

**PVT Wireless Limited Partnership  
4011 West Main  
Artesia, NM 88210-9566**

July 10, 2002

*Via ECFS Electronic Filing*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

**Re: CC Docket No. 94-102 / Quarterly TTY Implementation Report  
Broadband PCS Stations KNLH424, KNLG212, KNLF775 and KNLF768**

Dear Ms. Dortch:

PVT Wireless Limited Partnership ("PVT") hereby submits its final quarterly report on implementation of TTY access to 9-1-1 over its digital wireless network, pursuant to the Commission's *Fourth Report and Order* in CC Docket No. 94-102.

PVT has launched its service on the Carlsbad E-Block and Roswell C1-Block using Nortel CDMA equipment, and has configured these systems to operate in conjunction with the Sprint PCS network. In this regard, appropriate software upgrades to provide TTY capability in PVT's CDMA network were installed and tested in June of this year.

With regard to the Hobbs C1-Block system, PVT has previously notified the Commission that its digital wireless network in this market was constructed using the UT Starcom Personal Access System and it is compliant with the Commission's TTY access requirements.<sup>1</sup> The Carlsbad F-Block system was also recently constructed using UT Starcom technology, so it too is TTY compliant.

Respectfully Submitted,



Lynn Gunwall  
Vice President Subsidiary Operations  
PVT NetWorks, Inc.  
Peñasco Valley Telephone Cooperative, Inc.

Att.

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<sup>1</sup> See Third Quarterly TTY Implementation Report of PVT Wireless Limited Partnership, filed October 15, 2001.

**PVT Wireless Limited Partnership  
Final E911 TTY Device Capability Report**

**I. DEVELOPMENT ACTIVITIES**

- 1) **Network Infrastructure Software Development** – PVT Wireless Limited Partnership (“PVT”) has launched its service on the Carlsbad E-Block and Roswell C1-Block using Nortel CDMA equipment, and has configured these systems to operate in conjunction with the Sprint PCS network. Appropriate software upgrades to provide TTY capability in PVT’s CDMA network were installed and activated by PVT’s switch provider in April – May of this year.

With regard to the Hobbs C1-Block system, PVT has previously notified the Commission that its digital wireless network in this market was constructed using the UT Starcom Personal Access System and it is compliant with the Commission’s TTY access requirements.<sup>1</sup> The Carlsbad F-Block system was also recently constructed using UT Starcom technology, so it too is compliant.

- 2) **Handset Development and Testing Plans** – PVT’s CDMA customers are able to purchase TTY capable handsets and equipment through our retail stores, or online from Sprint PCS. The following TTY capable handsets have been tested by Sprint PCS:

- PCS Phone by Samsung A400
- PCS Phone by Sanyo 6200
- PCS Phone by Kyocera 1135
- PCS Phone by LG 1010
- PCS Phone by LG 4NE1
- PCS Phone by Audiovox 9155

UTStarcom has tested its Personal Access System with the Ameriphone Model Q.90 and the Ultratec Ezcom PRO TTY models. These units were tested into the UTS702P mobile handset, the UTS708J handset, and the UTS800 Fixed Access Unit. In all cases, the TTY performed as if connected to a wired telephone line, though handover performance with the UTS702P resulted in loss of connectivity during the handover interval or about one second. This performance is consistent with the handover operation for voice calls and is not at all unique to TTY operation. All features, including the VCO and HCO operation of the Ameriphone Q.90 operated as expected from a wire line phone.

- 3) **Beta Testing and Lab Testing** – The provider of switching services for PVT is a Sprint PCS affiliate. PVT has confirmed that full beta and lab testing of network software, handsets and infrastructure equipment for providing TTY capability was completed by Sprint PCS.

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<sup>1</sup> See Third Quarterly TTY Implementation Report of PVT Wireless Limited Partnership, filed October 15, 2001.

- 4) **Release and General Availability to Carriers of Network Infrastructure Software** – As noted above, appropriate software upgrades to provide TTY capability in PVT's CDMA network were installed and activated in the April – May timeframe of this year.
- 5) **Availability to Carriers of Full Digital Acceptance Test Units** – At least six TTY-capable CDMA handsets are available to PVT for use in its ongoing testing efforts.
- 6) **Efforts Toward Achieving Digital Wireless Solution Compatibility with Enhanced TTY** – Dependent on handset vendors for enhanced TTY devices.

## II. TESTING AND DEPLOYMENT ACTIVITIES

- 7) **Carrier Coordination of Testing with PSAP** – PVT is relying on the ATIS-sponsored TTY Technical Standards Incubator (TTSI) program to coordinate PSAP testing with the help of NENA and APCO.
- 8) **Carrier Testing Activities, Including Field Testing, Consumer and End-to-End Testing, and Other Necessary Tests** – All ongoing TTY testing activities on our Nortel CDMA network will be performed in accordance with procedures developed by Sprint PCS.
- 9) **Retail Availability of Necessary Consumer Equipment** – As mentioned in response to question #2, above, PVT's CDMA customers are able to purchase TTY capable handsets and equipment through our retail stores, or online from Sprint PCS. At least six TTY compatible phones are currently available to PVT's CDMA customers. Standard consumer TTY equipment is compatible with our UT Starcom systems.
- 10) **Geographic Scope of Network Infrastructure Deployment** – Since our CDMA network has only one switch, TTY capability was available across our whole network once the appropriate software upgrades were installed.