

CONSOLIDATED TELCOM
P.O. Box 1408
Dickinson, North Dakota 58602-1408

Marlene Dortch, Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: CC Docket No. 94-102
Broadband PCS Stations KNLG704 and KNLG705
BTA 113 (Dickinson, North Dakota)
Sixth Quarterly Report

Dear Ms. Dortch:

This report is filed pursuant to the Commission's *Fourth Report and Order*, in CC Docket No. 94-102, released December 14, 2000.

Consolidated Telcom is the licensee of stations KNLG704 and KNLG705 in the Broadband Personal Communications Service (PCS), acquired in Auction No. 11. These stations operate on the F- and D-blocks, respectively (10 MHz each). The licensed service area covers the Dickinson, North Dakota Basic Trading Area (BTA 113), a rural area in southwestern North Dakota. Consolidated utilizes GSM equipment manufactured by InterWAVE Communications, Inc. of Menlo Park, California (InterWAVE). Our PCS facilities have only been operational since April of this year.

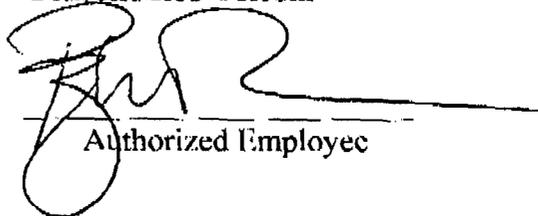
Section 20.18(c) of the Commission's Rules requires Broadband PCS licensees to be capable of transmitting wireless 911 calls from individuals with speech or hearing disabilities through means other than mobile radio handsets, e.g., through the use of Text Telephone Devices (TTY). In a filing with the Commission on June 28, 2002, we requested a temporary waiver of Rule Section 20.18(c), insofar as the June 30, 2002 compliance deadline is concerned. In our waiver request, we showed that our equipment supplier, InterWAVE, did not have the necessary software upgrade available to bring our PCS facilities into compliance in a timely manner. A letter to that effect from InterWAVE supported the waiver request.

We have been following the progress of the Wireless TTY Forum and working with our switch supplier, InterWAVE, toward effecting compliance with the Commission's requirements for providing TTY access to E-911 calling systems over our PCS facilities. Our progress as of June 30, 2002 is summarized in the attachment hereto using the outline at paragraph 17 of the *Fourth Report and Order*.

Very truly yours,

Consolidated Telcom

By:



Authorized Employee

Dated: July 15, 2002

Of Counsel:

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**Consolidated Telcom
E911 TTY Device Capability Report as June 30, 2002**

Development Activities

- 1) **Network Infrastructure Software Development** – We are actively participating in helping our vendor, InterWAVE, develop new software and infrastructure equipment to the best of our ability. We provide recommendations and discussions towards what needs to be done and what would work best for our needs.
- 2) **Handset Development and Testing Plans** - We are not involved in any handset development at this time. Our handset provider, Motorola, is actively developing a handset to work with our system but we have not seen any product or been given any release date when it would be available to us. When we do receive their handset product we will be doing extensive testing throughout our area to confirm its interoperability with our current system and network.
- 3) **Beta Testing and Lab Testing** - We do not have a wireless lab to do any beta testing, as the scale of our operation does not warrant that expense. We will be doing testing when the preliminary products arrive from our various wireless vendors, but normally at that point the products have already completed beta testing and we will only be doing tests with our own system setup.
- 4) **Release and General Availability to Carriers of Network Infrastructure Software** - We have not been given a firm release of the handset or network software.
- 5) **Availability to Carriers of Full Digital Acceptance Test Units** – Unable to determine a firm date at this time with any manufacturer or vendor.
- 6) **Efforts Toward Achieving Digital Wireless Solution Compatibility with Enhanced TTY** - We are actively working towards a solution for TTY devices and our hearing impaired customers. We are still at the mercy of our handset and network vendors, but we are staying in continuing contact with them about their progress and deployment dates.

Testing and Deployment Activities

- 7) **Carrier Coordination of Testing with PSAP** – We will test with the PSAPs in the areas where this service will be deployed. Coordination with the PSAP will be done on a case-by-case basis.

- 8) **Carrier Testing Activities, Including Field Testing, Consumer and End-to-End Testing, and Other Necessary Tests** – Each of these will be tested once equipment, software availability, deployment, installation, and turn up are completed. At that point we will be ready to begin testing activities.
- 9) **Retail Availability of Necessary Consumer Equipment** – None at this time. See item 2 above.
- 10) **Geographic Scope of Network Infrastructure Deployment** – None as of June 30, 2002.