

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
To Ensure Compatibility with Enhanced)	
911Emergency Calling Systems)	
)	
Illinois Valley Cellular RSA 2-I Partnership)	
Illinois Valley Cellular RSA 2-II Partnership)	
Illinois Valley Cellular RSA 2-III Partnership)	
Missouri RSA No. 7 Limited Partnership)	
d/b/a Mid-Missouri Cellular)	
Public Service Cellular, Inc.)	
Joint Petition for Reconsideration)	

COMMENTS OF THE RURAL TELECOMMUNICATIONS GROUP

The Rural Telecommunications Group (“RTG”) hereby respectfully submits its comments in the above-captioned proceeding in response to the Federal Communications Commission (“FCC” or “Commission”) *Public Notice* released August 27, 2002 (DA 02-2095).¹ RTG supports the Petition for Reconsideration (“Petition”) filed by Illinois Valley Cellular RSA 2-I Partnership, Illinois Valley Cellular RSA 2-II Partnership, Illinois Valley Cellular RSA 2-III Partnership, Missouri RSA No. 7 Limited Partnership d/b/a Mid-Missouri Cellular, and Public Service Cellular, Inc. (“petitioners”) seeking reconsideration of the Wireless

¹ RTG is a group of rural telecommunications providers who have joined together to speed the delivery of new, efficient, and innovative telecommunications technologies to the populations of remote and underserved regions of the country. RTG’s members provide wireless telecommunications services, such as cellular telephone service, Personal Communications Services (“PCS”), Multichannel Multipoint Distribution Service (“MMDS”), and Local Multipoint Distribution Service (“LMDS”) to their subscribers. RTG’s members are all affiliated with rural telephone companies or are small businesses.

Telecommunications Bureau's ("WTB") *Order*² in this proceeding. Specifically, RTG believes that ordering the petitioners to either "turn-off or convert"³ their TDMA networks by December 31, 2003 if their networks are not capable of transmitting 911 calls made using text telephone ("TTY") does not further the public safety goals of the Commission's TTY-compatibility rules.

The petitioners, like many RTG members, are currently utilizing TDMA-based networks but are looking to migrate to an alternative digital technology since the large nationwide carriers and manufacturers are abandoning TDMA technology in favor of GSM-based or CDMA-based technologies that are more suited for 3G applications. However, while these small carriers migrate to a new technology, they will still be supporting TDMA customers and a large number of TDMA roamers. As the petitioners "cut-over" to new digital technologies and these revamped networks become operational, they will place any subscriber desiring digital TTY capability on the new digital system. Therefore, the FCC's goal of accommodating the "interests of persons with disabilities who want and deserve the ability to access 911 services over digital wireless systems using their TTY devices at the earliest possible date"⁴ will be met.

RTG sees no purpose in requiring the petitioners to abandon their remaining TDMA-based systems on December 31, 2003 simply because the petitioners cannot justify expending scarce resources implementing digital TTY capability in their TDMA networks as they are being phased out. As small and generally rural wireless carriers, RTG members are acutely aware of the costs of upgrading their wireless networks. In comparison with larger carriers, rural carriers have fewer customers from whom they can recover the costs associated with both digital

² *In re Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, DA 02-1540, Order (June 28, 2002) ("*Order*").

³ Petition at p. 3.

⁴ *Order* at ¶ 22.

migration and TTY implementation. RTG agrees with the petitioners that spending money to make a TDMA system compliant when it is being phased out *and* the carrier has proceeded to deploy a fully compliant alternative system is a waste of scarce resources with absolutely no corresponding public safety benefit. In fact, if the petitioners are required to “turn-off” their TDMA systems by December 31, 2003, the petitioner’s remaining TDMA customers and TDMA roamers will not even have the public safety benefit of using their wireless phones for *any* communications whatsoever.

RTG respectfully requests that the Commission grant the Petition for Reconsideration and allow the small carriers to continue to operate their remaining TDMA networks after the December 31, 2003 TTY implementation deadline.

Respectfully submitted,

_____/s/_____

RURAL TELECOMMUNICATIONS GROUP

Caressa D. Bennet, General Counsel
Kenneth C. Johnson, Regulatory Director
Bennet & Bennet & Bennet, PLLC
1000 Vermont Avenue, N.W.
10th Floor
Washington, D.C. 20005
(202) 371-1500

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