

**Brookings Municipal Utilities
d/b/a Swiftel Communications
415 Fourth Street
Brookings, SD 57006**

October 10, 2002

Ms. Magalie Roman Salas, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

**Re: CC Docket No. 94-102 / Quarterly TTY Implementation Report
Broadband PCS Stations WPOI260 and WPQL803
MTA12 A2 – Minneapolis, St. Paul, MN
MTA32 B2 – Des Moines-Quad Cities, IA**

Dear Ms. Salas:

Brookings Municipal Utilities d/b/a Swiftel Communications (“Swiftel”) hereby submits this quarterly report on implementation of TTY access to 9-1-1 over its digital wireless network. Swiftel is filing this report pursuant to instructions set forth in the Commission’s *Order* released June 28, 2002, in CC Docket No. 94-102.¹

On June 27, 2002, Swiftel filed a request for limited waiver of the Commission’s TTY implementation deadline because it needed to perform a complex modification to its hybrid wireline/wireless switch before it could install the necessary software upgrade to provide TTY capability on its CDMA network.² In particular, Swiftel sought an extension of nine months (*i.e.*, until March 31, 2003) to implement its new wireless switch and to provide TTY capability on its network. The Wireless Bureau has allowed carriers in similar circumstances up to one year of additional time to achieve TTY compliance.³

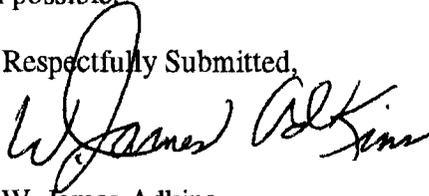
¹ See Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Calling Systems, *Order*, CC Docket 94-102 (*rel.* June 28, 2002). This *Order* indicated that carriers should continue to file quarterly TTY status reports until their implementation is complete. *Order* at para. 24.

² See Request for Limited Waiver of Swiftel Communications, CC Docket 94-102, *filed* June 27, 2002.

³ The Wireless Bureau has recognized the special circumstances faced by small wireless carriers using Nortel’s hybrid wireless/wireline switch and granted a one-year extension for SpectraCom, Inc. d/b/a PYXIS Communications to implement TTY capability throughout its wireless network. *Order* at p. 15.

As indicated in the attached report for October of 2002, Swiftel's progress toward implementation of a new wireless switch is on schedule and it expects to be fully TTY compliant by March 31, 2002, if not sooner. We will endeavor to provide TTY capability before this extended deadline, if at all possible.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "W. James Adkins". The signature is written in a cursive style with a large initial "W" and a long, sweeping underline.

W. James Adkins
Technical and Network Operations Manager

Att.

Brookings Municipal Utilities d/b/a Swiftel Communications
E911 TTY Device Capability Report for October, 2002

I. DEVELOPMENT ACTIVITIES

- 1) **Network Infrastructure Software Development** – Since filing our last TTY report and temporary waiver request, we are pleased to report that Swiftel has made significant progress toward implementation of a new MTX wireless switch that will support TTY capability. Nortel Networks (“Nortel”) has delivered the new switch that we ordered in May of this year, and Nortel technicians are in the final stages of on-site installation and testing. The switch is expected to be turned over to Swiftel for further testing on October 11, 2002. If all goes as planned, we will place the new switch into service before the Christmas holiday (on or around December 18, 2002). However, because the new switch must be using the same software level as our dual-load switch during the cut-over process (MTX09), Swiftel’s network will not immediately support TTY capability. We have scheduled for an upgrade to MTX10 software (which will provide full TTY compliance) on February 5, 2003. As a result, we fully expect to provide TTY capability throughout our network by March 31, 2003, if not sooner.
- 2) **Handset Development and Testing Plans** – We are closely following the CDMA handset development and interoperability testing that is being performed by Sprint PCS. We have learned from Sprint PCS and our handset vendor that the following CDMA handsets that we currently have in stock have been tested and are TTY capable:
 - PCS Phone by Sanyo 6200
 - PCS Phone by Kyocera 1135
 - PCS Phone by LG 4NE1
 - PCS Phone by Audiovox 9155
- 3) **Beta Testing and Lab Testing** –Swiftel is a small rural carrier, and is looking to its equipment manufacturers to conduct full beta and lab testing of network software, handsets and infrastructure equipment. However, Swiftel will test the equipment it procures as soon as it is available, to make sure it meets the manufacturer’s specifications.
- 4) **Release and General Availability to Carriers of Network Infrastructure Software** – See answer to #1, above. We also direct the Commission’s attention to Nortel’s most recent TTY status report, which we understand will be included in the October 2002 report in CC Docket No. 94-102 by ATIS/TTY Forum.
- 5) **Availability to Carriers of Full Digital Acceptance Test Units** – See Item #2, above.
- 6) **Efforts Toward Achieving Digital Wireless Solution Compatibility with Enhanced TTY** – Dependent on handset vendors for enhanced TTY devices.

- 7) **Carrier Coordination of Testing with PSAP** – Swiftel will test with the PSAPs in the areas where this service will be deployed. Any coordination with the PSAP will be done on a case-by-case basis, in cooperation with the relevant PSAP personnel. In addition, Swiftel will be following the ATIS-sponsored TTY Technical Standards Incubator (TTSI) program for further information regarding PSAP testing.
- 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.
- 9) **Retail Availability of Necessary Consumer Equipment** – Subject to availability from Sprint PCS and our handset vendor, Swiftel's CDMA customers will be able to purchase TTY capable handsets and equipment through our retail stores, or online from Sprint PCS. As noted in response to Item #2 above, at least six TTY-compliant handsets have been tested and approved for operation on CDMA networks.
- 10) **Geographic Scope of Network Infrastructure Deployment** – Since our network has only one switch, as necessary software becomes available, it will be deployed across our whole network.