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Report to the Federal Communications Commission on Carrier Efforts Toward Attaining Digital TTY Accessibility, and the Status of the Various Technological Solutions, as Provided by CC Docket No. 94-102, In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems

Illinois Valley Cellular RSA 2-II Partnership dba Illinois Valley Cellular (“Illinois Valley”), by its attorneys, pursuant to the Federal Communications Commission’s (“Commission” or “FCC”) *Fourth Report and Order* in CC Docket No. 94-102,¹ and the subsequent *Order* in the same proceeding,² hereby files a Quarterly Report for the quarter ending September 30, 2002, detailing its efforts towards attaining digital text telephone (“TTY”) accessibility, and the status of the various technological solutions that will help it attain that goal.

In its *Fourth Report and Order* the Commission established December 31, 2001 as the new deadline for carriers operating digital wireless systems to have obtained all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices. It further established June 30, 2002 as the deadline for carriers to integrate, test and deploy the technology in their systems in conjunction with the public safety community.³ In order to be assured that the aforementioned deadlines would be met without complication, the Commission required digital wireless carriers to submit Quarterly Reports fifteen days after the end of each quarter.⁴ Illinois Valley has kept the Commission informed as to its progress in achieving TTY-compatibility and, due to Illinois Valley’s transitioning to a new digital technology, Illinois Valley requested waiver of these deadlines until December 31, 2003. In its recently released *Order* in this proceeding, the Commission granted Illinois Valley’s request for waiver, while requiring Illinois Valley to continue to submit Quarterly Reports.⁵ Illinois Valley now files this instant report with the Commission.

¹ In the Matter of Revision of the Commission’s Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Fourth Report and Order*, CC Docket No. 94-102, 15 FCC Rcd 25216, 65 Fed. Reg. 82293 (December 28, 2000), (“*Fourth Report and Order*”).

² In the Matter of Revision of the Commission’s Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Order*, CC Docket No. 94-102, 17 FCC Rcd 12084, (rel. June 28, 2002) (“*Order*”). (granting Illinois Valley waiver of the rule until December 31, 2003).

³ 47 C.F.R. § 20.18(c).

⁴ See, *Fourth Report and Order* (December 28, 2001).

⁵ See, *Order* (rel. June 28, 2002).

I. Carrier Background

Illinois Valley provides analog and digital TDMA CMRS wireless service in the Illinois 2-Bureau RSA.⁶ As acknowledged by the Commission in its grant of Illinois Valley's request for waiver, compliance with the Commission's June 30, 2002 deadline was impractical.

II. Access to 911 Through TTY Devices

A. Development Activities

During the third quarter, Illinois Valley issued purchase orders for an overlay of its entire 36 cell-site TDMA network and modifications to its Mobile Switching Center to support a TTY-compatible digital network based on an alternate digital protocol. Installation and commissioning is scheduled to begin in the fourth quarter and IVC anticipates activation of the entire overlay system well in advance of the December 31, 2003 deadline.

During the third quarter of 2002, Illinois Valley contacted the Commission's Consumer & Governmental Affairs Bureau, to help "ensure that [Illinois Valley's] subscribers are informed of its waiver until December 31, 2003."⁷ Illinois Valley contacted the Bureau per the Commission's suggestion made to all carriers receiving waivers, despite the fact that Illinois Valley is not aware of any existing customer that uses a TTY device on its analog network or expressed a desire to utilize such devices on either its analog or digital network. Illinois Valley was included on the Commission's list of carriers who received waiver from 47 C.F.R. 20.18(c), posted on the Consumer & Governmental Affairs Bureau's website.⁸

B. Testing and Deployment Activities

No testing or deployment activities were undertaken during the third quarter.

III. Conclusion

Illinois Valley has been granted a waiver of the Commission's June 30, 2002 deadline for compliance with 47 C.F.R. 20.18(c), until December 31, 2003. Because of the announced abandonment of TDMA by Illinois Valley's roaming partners, Illinois Valley is preparing to migrate its network to an alternate digital technology that will not only meet the TTY-compatibility requirements but will also be capable of meeting the other FCC-mandated capabilities. When Illinois Valley makes its migration to a new digital technology, Illinois Valley will deploy that technology in a mode fully compatible with TTY devices. As required,

⁶Station KNKN582 (CMA395B2).

⁷ See, *Order*, at ¶ 25.

⁸ See, <http://www.fcc.gov/cgb/dro/e911tty.html> (last visited September 30, 2002).

CERTIFICATE OF SERVICE

I, Ruth E. Garavalia, a secretary with the law firm of Kurtis & Associates, P.C., do hereby certify that I have this 11th day of October 2002, filed the foregoing “REPORT TO THE FEDERAL COMMUNICATIONS COMMISSION ON CARRIER EFFORTS TOWARD ATTAINING DIGITAL TTY ACCESSIBILITY, AND THE STATUS OF THE VARIOUS TECHNOLOGICAL SOLUTIONS, AS PROVIDED BY CC DOCKET NO. 94-102, IN THE MATTER OF REVISION OF THE COMMISSION’S RULES TO ENSURE COMPATIBILITY WITH ENHANCED 911 EMERGENCY CALLING SYSTEMS” electronically with the Federal Communications Commission’s Electronic Comment Filing System. I have also filed a copy of this report with the Federal Communications Commission’s copy contractor, Qualex International. In addition, a copy of this report has been provided to Melinda Littell of the Commission’s Wireless Telecommunications Bureau.

/s/ Ruth E. Garavalia
Ruth E. Garavalia