

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Revision of the Commission's Rules) CC Docket No. 94-102
to Ensure Compatibility with Enhanced)
E911 Emergency Calling Systems)
)

To: The Commission

**Quarterly Report of SpectraCom, Inc. d/b/a PYXIS Communications
Regarding TTY Access to Digital Wireless Systems**

SpectraCom, Inc. d/b/a PYXIS Communications ("PYXIS") hereby reports on its implementation of text telephone ("TTY") access to digital wireless systems, in compliance with the Federal Communications Commission's ("FCC" or "Commission") *Waiver Grant Order* in the above-captioned proceeding.¹

On May 30, 2002, PYXIS, relying in part on the latest information from its May meetings with Nortel, filed for a limited waiver of the June 30, 2002 deadline for operators of digital wireless systems to be capable of transmitting 911 calls from individuals with speech or hearing disabilities through the use of text telephone ("TTY") devices.² In its waiver petition, PYXIS indicated that, based on its inability to obtain a price quote and switch modification dates from Nortel, and an estimated nine month conversion and implementation period triggered by Nortel's formal acceptance of the order, PYXIS did not anticipate being able to install the TTY upgrade in its modified switch until May 2003 and to be fully implemented until June 30, 2003. As noted

¹ *In re Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, Order, CC Docket No. 94-102, DA 02-1540 (June 28, 2002) ("*Waiver Grant Order*").

² 47 C.F.R. § 20.18(c).

in PYXIS's December 21, 2001 report, Nortel had cautioned that it had to modify ("split") PYXIS's switch in order to be able to load the MTX10 software necessary to achieve digital TTY compatibility.³

In its last report filed on July 11, 2002, PYXIS stated that it had met with Nortel regarding a price quote and a firm date for the switch modification and, as PYXIS anticipated in its waiver, Nortel could not commit to a firm price and date commitment at that juncture. In subsequent contacts with Nortel, Nortel is still unable to provide a firm price commitment or an estimated date by which it can finish the switch modification. However, PYXIS issued a purchase order on September 19, 2002 to Nortel to have a Nortel field engineer make a preliminary site visit to Worland, Wyoming where the PYXIS switch is located in order for Nortel to begin the process of "splitting" the switch. PYXIS has yet to hear back from Nortel regarding a specific date for this site visit.

PYXIS, while discouraged by Nortel's continually slipping schedule, still hopes to nail down Nortel to a firm pricing and scheduling commitment when Nortel's field engineer examines PYXIS' switch. Assuming that Nortel is able to develop such a firm schedule later this year for performing the requisite switch modification, PYXIS will then be able to determine when it will be able to install and test the TTY upgrade in its modified switch.

October 15, 2002

³ PYXIS's switch is a DMS 100W wireline/wireless hybrid currently utilizing software load NA13 for wireline operations and MTX09 for wireless operations. Nortel no longer supports such wireline/wireless hybrid switches with software upgrades. PYXIS must split the switch in two in order for PYXIS to upgrade to MTX10 in the separate wireless portion in order to achieve digital TTY compatibility.