

**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 Cellular Mobile Systems of St. Cloud
Regarding TTY Access to Digital Wireless Systems**

Cellular Mobile Systems of St. Cloud (“CMS”) 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 June 10, 2002, CMS 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, CMS noted that Nortel, its infrastructure provider, had informed CMS that the earliest that it expected to be able to deliver the necessary software upgrade to CMS was November 2002. As CMS stated in its July 11, 2002 TTY Quarterly Report, Nortel maintained that it remains on schedule for the necessary software delivery and installation. Since that time, CMS has upgraded from MTX7 to

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).

MTX9 software for its switch. CMS intends to upgrade to MTX10 as soon as Nortel delivers the software. CMS remains in contact with Nortel and the earliest Nortel expects to be able to deliver the MTX10 is the end of November. Assuming that Nortel can stay on this schedule, CMS expects that Nortel can deliver and install the TTY upgrade software by December 2002, and that CMS can test the TTY solution and have it working before its FCC-adjusted implementation date of January 31, 2003.

October 15, 2002