

SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.
P.O. Box 555
Escalante, Utah 84726

Marlene Dortch, Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: CC Docket No. 94-102
Broadband PCS Station KNLG223
BTA 392 (St. George, Utah)
Seventh (and Final) Quarterly Report

Dear Ms. Dortch:

This report is filed pursuant to the Commission's *Fourth Report and Order*, in CC Docket No. 94-102, released December 14, 2000.

South Central Utah Telephone Association (South Central), a rural area telephone cooperative, is the licensee of the referenced station in the Broadband Personal Communications Service (PCS). South Central serves the St. George, Utah BTA on the PCS F-block spectrum.

In our Sixth Quarterly Report in these proceedings, we advised the Commission of our progress, as of July 15, 2002, in achieving compliance with the Commission's requirements for providing access to E-911 calling systems over our PCS facilities. We indicated that our switch supplier, Nortel Networks, had installed the NBSS 10.1.3 software upgrade on our existing software load MTX 9.0, which the Nortel office servicing our account believed would allow us to handle 911 calls from our CDMA mobiles equipped with TTY devices.

However, this conflicted with information being disseminated by other offices of Nortel claiming that TTY compliance could not be achieved without going to the software load MTX 10.0, which could not be accomplished without the purchase of a new wireless switch. We attempted to resolve the conflict but were unable to do so by July 15, 2002. Moreover, we were unable to obtain a CDMA handset equipped with a TTY device to do any actual field testing. And, so, out of an abundance of caution we requested a waiver of Section 20.28(c) of the Commission's Rules, conditioned upon a firm determination of whether the software upgrade installed by Nortel on June 13, 2002 brought us into compliance with the rule, as claimed orally by Nortel, and, if not, until the new wireless switch was operational, which was estimated to be by June 30, 2003.

We are now pleased to report that, as of October 10, 2002, we have verified, to the best of our knowledge, that we are in compliance with the TTY access requirement.

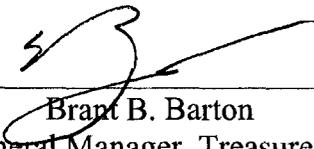
In early September, we ordered two TTY units for testing. We received the units late in September and our initial testing produced unfavorable results. When we determined that one of the units was defective, we sent it out for repair. Anticipating that it would not be ready in time to test by October 15, we initiated testing directly with a public safety answering point (PSAP) in our area (Iron County PSAP, in Cedar City, Utah). Those tests proved fruitful; on October 10, a test call was transmitted successfully on our system, to the satisfaction of the PSAP and our in-house engineers who conducted the tests.

We will maintain the two TTY units for further testing of system integrity and to check future handsets for compatibility.

Respectfully submitted,

South Central Utah Telephone Association, Inc.

By:



Brant B. Barton
General Manager, Treasurer

Dated: **October 15, 2002**

Of Counsel:

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