

MINNESOTA PCS LIMITED PARTNERSHIP
13810 24th Avenue North
Plymouth, Minnesota 55441-3601

October 15, 2002

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Quarterly Report
CC Docket 94-102
Broadband PCS Station KNL641, Fargo, ND
Broadband PCS Station KNL642, Grand Forks, ND
Transmission of 911 Calls from TTY Devices

Dear Ms. Dortch:

This report is filed pursuant to the directive contained in the Commission's *Fourth Report and Order*, (CC Docket 94-102), FCC 00-436, Released December 14, 2000 ("the *Fourth R&O*").¹

Minnesota PCS is a small carrier serving small urban markets and rural areas. It lacks any influence over the research and development activities of equipment manufacturers, and will rely wholly upon its equipment manufacturers to install (on a turnkey basis) the equipment necessary to allow its PCS system to process E-911 calls originating from Text Telephone ("TTY") devices.

As Minnesota PCS has advised the Commission in the past, it intends to obtain and install the equipment necessary for enhanced 911 services as soon as technically and economically feasible after it becomes available from equipment vendors. On June 28, 2002, Minnesota PCS requested a waiver of the Commission's E911 TTY rules due to financial impossibility, and submitted evidence consisting of financial statements under separate cover with a request for confidentiality.

Minnesota PCS has been informed by its equipment vendor, Motorola, that an upgrade to Minnesota PCS's current system would cost approximately \$1.8 million. Minnesota PCS serves 4,318 subscribers. The cost of the upgrade on a per subscriber basis would be nearly \$417. Minnesota PCS does not have the funding and does not expect to be able to obtain the funding to

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 94-102, 15 FCC Rcd 25216 (December 28, 2000), ("*Fourth Report and Order*").

make such a costly upgrade feasible, and thus requested a waiver of the Commission's rules. Minnesota PCS's financial status has not changed since that waiver request was filed.

Respectfully submitted,

Minnesota PCS Limited Partnership

By: Nels Baden
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