

**North
Dakota
Network
Company**

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January 8, 2003

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

**Re: CC Docket No. 94-102
Eighth Quarterly TTY Implementation Report
BTA299 D - Minot, ND
BTA299F - Minot, ND**

Dear Ms. Dortch:

North Dakota Network Co. ("NDNC") hereby submits its quarterly report on implementation of Text Telephone Device ("TTY") access to 911 over its digital wireless network, pursuant to the Commission's *Order* released on June 28, 2002, in CC Docket No. 94-102.

NDNC is using Nortel CDMA base stations and switching equipment in its network. Thus, NDNC is dependent on Nortel for the provision and installation of the equipment and software necessary to allow NDNC's digital wireless network to process 911 calls originating from TTY devices. However, as the Commission is aware, Nortel has discontinued support for its DMS-100 product line and carriers such as NDNC were forced to purchase and install a new switching platform, and to perform further software upgrades, in order to implement TTY capability.

NDNC initially sought a six-month extension (*i.e.* until December 31, 2002) to meet this requirement. However, when it became apparent that NDNC would not be able to complete the transition of its network by December 31st, the Company sought a further extension until June 30, 2003, to implement full TTY capability. The Commission has not yet acted upon NDNC's request, however, it is consistent with the terms of an extension that the Commission granted to another small wireless carrier faced with the same technical dilemma.¹

¹ In particular, the FCC granted a one-year extension of the TTY capability deadline (*i.e.*, until June 30, 2003) to SpectraCom, Inc. d/b/a PYXIS. See *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Order*, DA 02-1540 (*rel.*, June 28,

As of January 2003, NDNC has completed the following tasks as it endeavors to bring its system into compliance with the Commission's TTY rules:

1. The building/area construction and wall destruction is 100% complete.
2. Two additional Halon tanks and additional smoke detection equipment have been installed within the new area.
3. An 800 amp commercial power breaker panel has been installed to support two new air conditioning units.
4. Two new 30,000 BTU air conditioners as well two new cooling units have been installed to replace the existing 20,000 BTU units.
5. A new backup generator has been installed to supply backup power in case of a commercial power outage.
6. A new steel superstructure and cable rack has been installed to connect the new wireless switch area to the wireline switch area.
7. New larger battery strings have been installed to accommodate the additional load of the wireless switch.
8. Additional DC power rectification has been added to accommodate the additional load of the wireless switch.
9. The main DC power distribution panel has been upgraded to accommodate four additional circuit breakers that are needed for the new wireless switch.
10. A new DMS-MTX switch has been installed and powered up.
11. The wireless Base Station Controller has been installed and powered up.
12. Testing of the DMS-MTX switch has been completed.
13. Testing of the wireless Base Stations Controller has been completed.
14. Testing of the MTX09 software load and feature set for the DMS-MTX switch has been completed.
15. Testing of the NBSS 9.0.6 software load and feature set for the Base Station Controller and Base Station Manager has been completed.

Since filing its most recent quarterly TTY status report in October of 2002, NDNC has initiated and completed the following tasks:

2002).

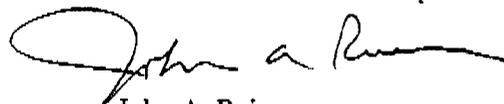
1. Transitioned wireless traffic from the DMS-100w to the new DMS-MTX.
2. Added enhanced vocoders to the new Base Station Controller.
3. Upgraded the DMS-MTX switch to MTX10 software load.
4. Removed the wireless load from the DMS-100w to make it a DMS-100 and upgraded the DMS-100 to the LEC15 software load.

Remaining upgrade tasks to be completed and projected dates for completion are as follows:²

5. January 8, 2003 - Add the 250 software load to the DMS-100 to make it a DMS-500 and initiate upgrade to LTT15 software load.
6. 2Q 2003 - Add functionality to the switches for Local Number Portability Phase II, E911 phase II, TTY/TDD, and the CALEA Punchlist capabilities.

As demonstrated above, NDNC is well on the road to achieving TTY compliance. If all goes according to plans, our installation and testing of the remaining software upgrades should take just several additional weeks to complete. NDNC will notify the Commission once it has completed this process.

Sincerely,



John A. Reiser
Chief Operations Officer
North Dakota Network Co.

² These projected dates may be subject to change, depending on equipment or software failure.