

KRASKIN, LESSE & COSSON, LLC
ATTORNEYS AT LAW
TELECOMMUNICATIONS MANAGEMENT CONSULTANTS

ORIGINAL
COPY

2120 L Street, N.W., Suite 520
Washington, D.C. 20037

Telephone (202) 296-8890
Telecopier (202) 296-8893

RECEIVED

January 22, 2003

JAN 22 2003

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Pine Belt PCS, Inc. and Pine Belt Cellular, Inc.
Petition for Waiver of Sections 20.12(c) and 52.31(a)(2) of the
Commission's Rules
CC Docket Nos. 99-200 & 95-116; WT Docket No. 01-184
Ex Parte Presentation - Bi-Monthly Status Report Pursuant to Petition for
Waiver

Dear Ms. Dortch:

On November 22, 2002, Pine Belt PCS, Inc. and Pine Belt Cellular, Inc. (collectively "Pine Belt Wireless") submitted a Petition for Waiver seeking temporary extension of the requirement for Commercial Mobile Radio Service providers to support roaming with customers with pooled numbers, as set forth in Section 20.12(c) and 52.31(a)(2) of the Commission's Rules (CC Docket Nos. 99-200 & 95-116; WT Docket No. 01-184). In its Petition, Pine Belt Wireless committed to providing the Commission with bimonthly status reports during the temporary extension period. Transmitted herewith on behalf of Pine Belt Wireless is its first bimonthly status report.

Please contact the undersigned with any questions regarding this matter.

Respectfully submitted,


John Kuykendall
Its Attorney

Attachment

cc: Blaise Scinto, Chief, Policy Division, Wireless Telecommunications Bureau
Patrick Forster, Policy Division, Wireless Telecommunications Bureau
Jared Carlson, Policy Division, Wireless Telecommunications Bureau
Qualex International

**PINE BELT PCS, INC. AND PINE BELT CELLULAR, INC.
BI-MONTHLY STATUS REPORT PURSUANT TO REQUEST FOR WAIVER
OF REQUIREMENT FOR CMRS PROVIDERS TO SUPPORT ROAMING FOR
CUSTOMERS WITH POOLED NUMBERS**

January 22, 2003

JAN 22 2003

On November 22, 2002, PineBelt PCS, Inc. and Pine Belt Cellular, Inc. (collectively "Pine Belt Wireless") filed a Petition for Waiver seeking temporary extension, until November 23, 2003, of the requirement for Commercial Mobile Radio Service ("CMRS") providers to support roaming with customers with pooled numbers ("Petition"). The Petition is currently pending before the Commission.

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In its Petition, Pine Belt Wireless commits to providing the Commission with bi-monthly status reports during the temporary extension period. To this end, Pine Belt Wireless is in the process of gathering specific information to provide data regarding the probable result of a waiver grant, including:

- PSAP procedure in handling dropped calls;
- percentage of roaming traffic that comes from the company's major roaming partners serving markets in the top 100 MSAs; and
- the extent to which the company's major roaming partners mirror the Mobile Identification Number ("MIN") and the Mobile Directory Number ("MDN") (resulting in full call back information being provided to the PSAP).

Due to the intervening holiday period, turnover in PSAP staff and company employee absences, however, these data-collecting efforts have been delayed. Accordingly, Pine Belt Wireless herein provides a report of its progress to date and commits to providing the Commission with such data as soon as possible, and in any event, such data is available by February 27, 2003.

In its Petition, Pine Belt Wireless reported that for the past two years, it has been diligently seeking funding for necessary software upgrades and other system improvements, part of which will allow Pine Belt Wireless to implement the "MIN/MDN" Standard to support roaming of customers with pooled numbers. Pine Belt Wireless herein reports that it continues to have promising indications from a major lender, but has yet to receive official notice regarding such funding. As demonstrated in the Petition, without assurance of proper funding, Pine Belt Wireless cannot execute a purchase order with its vendor to make the requisite upgrades.

¹ See *Wireless Telecommunications Bureau Seeks Comment on Petitions for Extension of the Deadline for Support of Roaming by Wireless End-Users with Ported or Pooled Numbers: Public Notice*, CC Docket Nos. 99-200 & 95-200; WT Docket No. 01-184; DA 03-148 (rel. Jan. 16, 2003) (FCC seeking comment on Pine Belt Wireless' petition).

PINE BELT WIRELESS BI-MONTHLY REPORT

January 22, 2003

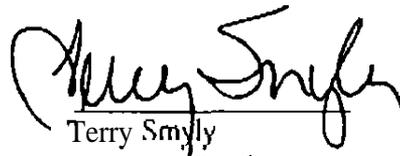
Page 2

As noted in its Petition, to the extent necessary, Pine Belt Wireless also requests waiver or temporary extension of the Commission's requirement for carriers to deliver valid call back numbers to the four Public Safety Answering Points ("PSAPs") in the areas where it is providing Phase I enhanced 911 ("E911") services. Pine Belt Wireless was the first wireless carrier to begin providing Phase I E911 service to these PSAPs. The company reports that it has contacted three of the four PSAPs in its licensed area alerting them to the possible delivery of inaccurate call back numbers for roamers with pooled numbers and has attempted to contact the fourth.

Pine Belt Wireless also reports that it is in the process of contacting its major roaming partners to seek to estimate the frequency to which the PSAPs would receive incorrect call back numbers from roamers with pooled numbers during the transition period. One of these partners has informed Pine Belt Wireless that it will continue to mirror the MIN and MDN for an unspecified period of time. Accordingly, until this carrier changes this procedure, for roamers of this carrier that have pooled numbers, each of the four affected PSAPs will receive the correct call back number since the MIN that will be transmitted to the PSAP will be identical to the subscriber's mobile phone number. Pine Belt Wireless is awaiting information from the other two major roaming partners regarding their number pooling procedures.

No further developments have occurred since the date Pine Belt Wireless filed the Petition.

Respectfully Submitted



Terry Smyly
Customer Service Manager