

**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 Leaco Rural Telephone Cooperative, Inc.
Regarding TTY Access to Digital Wireless Systems and Request for Limited Waiver**

Leaco Rural Telephone Cooperative, Inc. (“Leaco”), by its attorneys, 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

In its December 11, 2002 request for waiver, Leaco reported that Lucent had delivered and successfully installed the digital TTY software into Leaco’s switch. However, Leaco noted in its request for waiver that Lucent, Leaco’s switch provider, had yet to “convert” Leaco’s network to run on the new TTY compatible software. In Leaco’s last report filed on January 15, 2003, Leaco reported that Lucent had still not scheduled a date by which it could “convert” the network and thus complete the digital TTY upgrade. At that time Leaco was cautiously optimistic that it could still meet its March 7, 2003 deadline *if* Lucent could schedule the conversion before the end of January 2003.

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*”).

On January 16, 2003, Lucent visited the Leaco site and took inventory of Leaco's network in order to ascertain what remaining implementation problems needed to be fixed in order to make Leaco's network compatible with the new software load. Based on the Lucent inventory, 10 out of 12 of Leaco's cell sites had the hardware necessary to operate with the new Lucent software. However, Leaco was unable to turn on the new software for its entire network until the remaining two sites were fitted with the correct Lucent hardware, since turning on the new software prior to the upgrade of the two sites would have knocked the two sites off the network, causing dropped customer calls and a marked deterioration in Leaco's mobile service. Lucent then refused to sell Leaco the necessary hardware to upgrade the two sites unless Leaco also signed a service contract with Lucent for the installation of the hardware even though Leaco itself had previously installed the hardware at the other 10 sites. On March 21, 2003, after an extensive search, Leaco was able to locate and order from a third-party vendor, Somera, the final Lucent hardware necessary to make its network digital TTY compatible.² Leaco now has the hardware in its possession and expects to install it by April 24, 2003.

The final step in Leaco's digital TTY implementation involves converting its communication links with its third-party TTY provider, TSI. Immediately after purchasing the hardware on March 21, Leaco scheduled an appointment with TSI to complete the conversion. The earliest date on which TSI was available to complete the conversion was May 24, 2003. Leaco's network will be fully digital TTY compliant by May 24, 2003. Accordingly, for the reasons set forth in its December 11, 2002 waiver

² By purchasing the hardware from Somera and installing it itself, Leaco will save \$230,000, a substantial sum for a small, rural carrier like Leaco.

request, as supplemented by the facts set forth herein, Leaco requests a limited extension of waiver of the Commission's digital TTY rules until May 24, 2003.

Respectfully submitted,
**LEACO RURAL TELEPHONE
COOPERATIVE, INC.**

By: _____/s/_____

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Dated: April 11, 2003

Declaration of John Smith

I, John Smith, do hereby declare under penalty of perjury the following:

1. I am the General Manager of Leaco Rural Telephone Cooperative, Inc.
2. I have read the foregoing "Quarterly Report Regarding TTY Access to Digital Wireless Systems and Request for Limited Waiver." I have personal knowledge of the facts set forth therein, and believe them to be true and correct.

/s/
John Smith

4/11/03
Date