3 RIVERS PCS, INC. d/b/a
3 RIVERS WIRELESS
P.O. BOX 3387
GREAT FALLS, MONTANA 59403-3387

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

Re: CC Docket No. 94-102
Broadband PCS Station WPOI209
Ninth 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.

3 Rivers PCS, Inc. d/b/a 3 Rivers Wireless (3 Rivers) is the licensee of station WPOI209 in the Broadband Personal Communications Service (PCS). Station WPOI209 is a license partitioned from the 30 MHz Block A license granted to GTE Macro Communications Corporation (GTE), on June 23, 1995, for the Spokane-Billings Major Trading Area (MTA). On April 17, 1997, the Commission approved the application to partition to 3 Rivers a portion of GTE's license for the Spokane-Billings MTA, to include the Great Falls, Billings, Bozeman, Helena and Butte (except for Powell County) Basic Trading Areas. 3 Rivers utilizes Nortel Networks' CDMA equipment for its PCS network.

We are continuing to follow the progress of the Wireless TTY Forum and are continuing to work with our switch supplier, Nortel Networks, and our handset vendors toward effecting compliance with the Commission's requirements for providing TTY

access to E-911 calling systems over our PCS facilities. The attachment hereto details the progress we have made as of March 31, 2003.

Respectfully submitted,

3 RIVERS PCS, INC. d/b/a
3 RIVERS WIRELESS

By: _____
Ernest J. Peterson, General Manager

Dated: April 15, 2003

Of Counsel:

Harold Mordkofsky
Blooston, Mordkofsky, Dickens, Duffy & Prendergast
2120 L Street, N.W.
Washington, DC 20037
Tel. (202) 828-5520
Fax (202) 828-5568
Email halmor@bloostonlaw.com

3 Rivers PCS, Inc. d/b/a 3 Rivers Wireless
E911 TTY Device Capability Report as of March 31, 2003

Network and Infrastructure Development – In our last quarterly report 3 Rivers PCS Inc. noted that we had received a proposal from Nortel Networks to start the process of splitting our dual load DMS-100 switch into two separate switches. This migration will allow us to implement software load MTX 10.x. With the implementation of this software, we will become TTY compliant on our switch. The projected schedule for this work is as follows:

April 28, 2003 - Equipment delivery
May 5, 2003 - Installation starts
August 15, 2003 - Completion of installation; testing begins
September 15, 2003 - Testing completed; in service

Handset Development and Testing Plans – Currently, 3 Rivers PCS has several handsets that are TTY compatible. They are the Kyocera 2325, 5135 and 7135, LG VX10 and VX2000, Motorola V60i, and Nokia 3585 and6385. We are now working to implement a test plan that will allow us to test the phones once the switch split and the new software are installed. In addition we are anticipating other models this year and will also test with each of those.

Beta and Lab Testing – Our plan is to test with the Montana School for the Deaf and Blind. As equipment becomes available, 3 Rivers PCS Inc will begin the testing process as soon as all aspects of the network infrastructure are completed.

Release and General Availability to Carriers of Network Infrastructure Software – The software is currently available, but 3 Rivers is unable to install the software on its current switching platform. Once the switch conversion is complete from the Dual Load DMS-100 Wireless on Wire Line to a standalone MTX platform, we will then be able to install the required software. See the projected schedule above under *Network and Infrastructure Development.*

Availability to Carriers of Full Digital Acceptance Test Units – We are anticipating new units to be arriving this next year. We currently carry the Kyocera 2325, 5135 and 7135, LG VX10 and VX2000, Motorola V60i, and Nokia 3585 and 6385. Being a small carrier we are unable to be on the front end of any handset release. Normally we are 6-12 months behind the larger carriers.

Efforts Toward Achieving Digital Wireless Solution Compatibility w/ Enhanced TTY – 3 Rivers PCS was the first wireless carrier to implement and complete the 711-dialing pattern across its network in the State of Montana. We are involved with MTAP

(Montana Telecommunications Access Program) to stay abreast of developments that will enhance the ability of the hearing impaired to use digital wireless equipment. And, we are on an expedited schedule to complete our infrastructure reconfiguration to become compliant.

Carrier Coordination with the PSAP – 3 Rivers will coordinate with each independent PSAP in its service area once the service is deployed. All coordination with the PSAP will be done on a case-by-case basis.

Carrier Testing Activities, Including Field Testing, Consumer End-To-End Testing, and Other Necessary Test – Each of these will be tested once equipment, software, deployment, installation, and turn up are complete.

Retail Availability of Necessary Consumer Equipment – Several handset models are available and being carried by 3 Rivers- Kyocera 2325, 5135 and 7135, LG VX10 and VX2000, Motorola V60i, and Nokia 3585 and 6385. We are anticipating several other models arriving this year.

Geographic Scope of Network Infrastructure Deployment – Our switch currently needs to be split from a Dual Load DMS-100 Wireless on Wire Line. Once this is completed we will have a standalone MTX Wireless switch; therefore implementation of the software will be network wide. See the projected schedule above under *Network and Infrastructure Development*.