

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

**In the Matter of** )  
 )  
**Revision of the Commission's Rules to** ) **CC Docket No. 94-102**  
**Ensure Compatibility with Enhanced 911** )  
**Emergency Calling Systems** )  
 )  
**Petition for Limited Waiver** )

**To: Chief, Wireless Telecommunications Bureau**

**AMENDMENT TO PETITION FOR LIMITED WAIVER OF  
SECTION 20.18(c) OF THE COMMISSION'S RULES**

Uintah Basin Electronic Telecommunications d/b/a UBET Wireless ("the Petitioner"), pursuant to Sections 1.3 and 1.925 of the Commission's Rules, hereby amends its pending "Petition for Limited Waiver of Section 20.18(c) of the Commission's Rules" ("Petition"), filed June 28, 2002, to request a compliance date of August 31, 2003 (instead of the April 30, 2003 deadline originally requested). In support hereof, the following is shown:

1. The Petitioner is a wholly-owned subsidiary of Uintah Basin Telecommunications Association, Inc. d/b/a UBTA Communications, a telephone cooperative owned by its subscribers. The Petitioner is the licensee of Commercial Mobile Radio Service ("CMRS") systems, i.e., cellular and broadband PCS.

2. In its Petition, the Petitioner requested a ten-month extension of time, up to and including April 30, 2003, within which to comply with the Rule 20.18(c) requirement that the Petitioner's digital wireless CMRS systems be capable of transmitting 911 calls from speech or hearing impaired individuals through the use of Text Telephone ("TTY")

Devices. June 30, 2002 was the original compliance deadline, as codified in Section 20.18(c) of the Commission's Rules.

3. As stated in the Petition, the limited waiver was requested due to vendor delays in the commercial availability of TTY-compliant network solutions. Specifically, the Petitioner's CMRS systems employ a DMS100W "dual-load" switch (which handles wireless and wireline traffic) manufactured by Nortel. This switch lacks digital wireless TTY capability; and it cannot be upgraded to add this (or any other) functionality since Nortel no longer provides support services or software upgrades for this product, essentially rendering it an obsolete technology. As described in detail in the Petition, the Petitioner is required to replace and "split" the switch. At the conclusion of this process there will be two switches, one for wireless traffic and one for wireline traffic; and the wireless switch will have digital wireless TTY functionality. As of the June 28, 2002 filing of the Petition, the Petitioner had been unsuccessful in its attempts to secure a price quote or delivery date from Nortel.

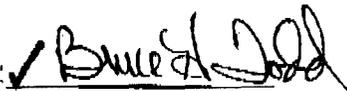
4. The Petitioner is now on the verge of achieving compliance with the Rule 20.18(c) requirement that the digital wireless portions of its CMRS systems be capable of processing 911 calls from digital wireless TTY Devices. The equipment has now been delivered by Nortel and installation is underway, with an anticipated installation completion date of July 29, 2003. Out of an abundance of caution, the Petitioner is requesting an August 31, 2003 compliance deadline to guard against unforeseen delays in completion of the installation, and to allow time for testing of the new equipment. The Petitioner will advise the Commission when installation has been completed.

**WHEREFORE**, good cause shown, the Petitioner requests that the Petition, as amended, be granted.

Respectfully submitted,

**Uintah Basin Electronic  
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UBET Wireless**

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By:   
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General Manager 

Dated:  April 24, 2003

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