

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

In the matter of )  
 )  
Revision of the Commission’s Rules To )  
Ensure Compatibility with Enhanced 911 ) CC Docket No. 94-102  
Emergency Calling Systems )  
 )

**Quarterly Report of Western Wireless Corporation  
on its Enhanced 911 Phase II Deployment**

Western Wireless Corporation (“Western”), on behalf of its subsidiaries, WWC Holding Co., Inc., WWC License L.L.C., and WWC Texas RSA Limited Partnership, and pursuant to the Federal Communications Commission’s (“FCC”) Order to Stay (“Order”), hereby submits its third Quarterly Report on its plans and progress regarding the deployment of Enhanced 911 (“E911”) Phase II service.<sup>1</sup> For purposes of E911 Phase II deployment and according to the Order, Western is defined as a Tier II carrier because it had more than 500,000 subscribers as of the end of 2001.<sup>2</sup>

**I. Introduction**

Western provides Commercial Mobile Radio Service (“CMRS”) under the CellularOne brand name in 19 states west of the Mississippi River. Western’s network is comprised of equipment from multiple manufacturers and infrastructure providers, and it operates analog and digital CMRS on its network using both Lucent and Nortel equipment. Additionally, Western’s network accommodates roaming traffic from a wide

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<sup>1</sup> See *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay, FCC 02-210 (2002).

<sup>2</sup> *Id*

assortment of carriers. Western has contracted with Intrado for assistance in deploying Phase I and Phase II services on its network using a handset-based solution – Assisted Global Positioning System (“AGPS”) – to provide Phase II location information. Western submitted to the Commission its limited Petition for a waiver of the Commission’s Phase II Rules on August 31, 2001.<sup>3</sup> In response to this and other carriers’ waiver requests, the Commission issued its Order establishing the deployment and reporting schedules for Tier II and Tier III carriers. Western has previously submitted two Quarterly Reports apprising the Commission of its progress in deploying E911 services. This third report updates the Commission on Western’s progress to date in deploying E911 services.

## **II. Handset Sales**

Western began selling and activating location-capable handsets in 2002, well in advance of the Commission’s March 1, 2003 deadline. It has increased the number of GPS-enabled handsets it sells to its customers and now offers four different models of handsets. Western is currently selling the Audiovox 9155, Audiovox 9500, Audiovox 8500 and the Nokia 3585i handsets with GPS capabilities. Western is also currently evaluating additional location-capable handsets for inclusion in its offering to customers. These handsets include the necessary GPS chipset which, when 9-1-1 is dialed, will enable it to calculate the latitude and longitude of the customer based upon communications with orbiting satellites.

Western offers service to the public via a wide assortment of sales channels and distributors, including a significant portion of its sales coming from indirect third-party

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<sup>3</sup> See Western Wireless Corp., Petition For Waiver of Section 20.18(g), CC Docket 94-102 (filed Aug. 31, 2001).

distributors. The indirect sales organizations sell Western's service to the public using a wide range of handset models that they purchase directly from vendors. As a result, Western has limited ability to influence the type of handsets sold by indirect distributors, especially when it comes to high-end phones that may have little or no value to consumers residing in areas where Phase II service has not been implemented. Consequently, achieving the FCC's handset sales benchmarks will prove to be very challenging for carriers operating in markets with a limited number of Phase II E911 requests for service and with indirect distributors independently selling a carrier's services and their own handsets.

### **III. Network Deployment**

During the past quarter, Western completed the necessary switch upgrades along with the appropriate database and network links to the Mobile Positioning Center ("MPC") and Position Determination Equipment ("PDE") to provide E911 services. Both the MPC and PDE are critical elements of Western's Phase II network. Furthermore, Western coordinated its testing and deployment efforts with Public Safety Answering Points ("PSAPs") and Local Exchange Carriers ("LECs"). As noted previously, Western completed the software upgrades to its Nortel and Lucent Mobile Switching Centers ("MSCs"). The upgraded switching software enables the MSCs and handsets to communicate effectively in order to deliver the signaling data containing the location information of the caller.

Western deployed E911 Phase II service in the First Quarter of 2003, and is currently delivering Phase II service to three separate 911 Districts in the State of Texas. Western's first deployment of Phase II E911 service took place in Midland, Texas with

the Midland Emergency Communications District (“Midland”). Western also deployed service in Texas to the Abilene/Taylor County 9-1-1 District and to the Potter-Randall County Emergency Communication District. Attached as Attachment A are letters from these Districts acknowledging receipt of Phase II service from Western.

In spite of these successful deployments, Western stands by its earlier statements to the Commission regarding the difficulty of deploying E911 Phase II services in rural America. In many rural areas, the LEC networks and the public safety equipment require substantial upgrades in order to be able to support the advanced signaling and data elements associated with Phase II service. In many of its states, Western is the first wireless carrier of any size undertaking Phase II deployment efforts.

In some states, the LECs and the PSAPs have considerable work remaining to be capable of receiving and processing Phase II location information. There continues to be significant unresolved obstacles to deployment of Phase II E911 service in certain states. As the Commission is aware, the LECs play a critical role in the delivery of service from the wireless network to the PSAP, and without the full preparation and upgrading of the LEC network, the service will not work. For instance, Phase II service requires an additional Automatic Location Identification (“ALI”) database upgrade to query the MPC at the time of a Phase II call in order to successfully deliver the ALI data to the PSAP. Many of the ALI databases are operated by the LEC, and as stated in Dale N. Hatfield’s Report to the Commission regarding the technical and operational issues impacting the provision of wireless enhanced 911 services (“Hatfield Report”), most LECs have a great deal of work left to do in order to complete the necessary upgrades.<sup>4</sup>

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<sup>4</sup> See Dale N. Hatfield, A Report on Technical and Operational Issues Impacting The Provision of Wireless Enhanced 911 Services, October 15, 2002.

Without such an upgrade to the ALI database, a wireless carrier cannot deliver Phase II latitude and longitude information to the PSAP. The Commission's rules clearly state that the PSAP is responsible for the upgrades to the ALI database.<sup>5</sup> The Commission established the input to the LEC Selective Router as being the demarcation point for determining which party should pay for any necessary upgrades.<sup>6</sup> The ALI database is on the PSAP side of the demarcation point and as such the PSAP bears the cost required for any necessary ALI database upgrades. Many LECs have not yet been able to complete the necessary upgrades to the ALI databases that PSAPs use to receive 911 calls. Until this changes, some PSAPs will not be able to receive and utilize the Phase II signal that Western would send to them. Furthermore, many PSAPs have not yet been able to execute a service agreement with the LEC regarding payment for the trunking and routing services necessary for a Phase II call to work successfully. Any delays in executing service agreements, or filing and getting approval of LEC tariffs, will result in delays in the deployment of service.

Western has spent considerable effort and expense in pursuit of readying its network in order to deliver Phase I and Phase II services. In order for Phase II service to work, many network elements must be upgraded and the entire network, from handset to PSAP, must be carefully coordinated to provide a seamless interface to carry the Phase II signal. If any portion of the network, public or private, is not prepared to carry the Phase II signal, the enhanced service will not work. Western has undertaken significant efforts to upgrade its network to meet the Phase II requirements. Its activities have included

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<sup>5</sup> Letter from Thomas J. Sugrue to Kathleen B. Levitz, BellSouth Corporation, et al., CC Docket No. 04-102, dated October 28, 2002; Letter from Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau, to Marlys R. Davis, E911 Program Manager, King County, Washington, at 1 (May 7, 2001), *aff'd on recon.*, FCC 02-146, CC Docket No. 94-102. (rel. July 24, 2002).

<sup>6</sup> *Id.*

testing GPS-capable handsets, cell sites, mobile switches, network facilities, and the PDE and MPC. Additionally, Western is closely working with the LECs and PSAPs to ensure that the existing emergency communications systems infrastructure will be capable of transporting and carrying the Phase II signal that Western will be sending to the PSAPs.

#### **IV. Deployment Status**

Western has received one or more requests for delivery of Phase I E911 service from PSAPs in twelve of the 19 states in which it provides service. During the last three months, Western has received only nine new requests for service. Prior to that, the majority of new requests for service have come from states where cost recovery statutes are in place, and where the PSAPs have funds available to pay for their equipment upgrade and the carriers' deployment costs. Because Western often finds itself first to deploy Phase I service to each of its requesting PSAPs, the PSAPs are largely unfamiliar with the deployment process, resulting in a steep learning curve and significant delays in implementation.

In accordance with the Commission's recent rule changes addressed in the *Richardson Order on Reconsideration*, a request for service from a PSAP is not valid unless a PSAP is capable or will be capable of receiving and utilizing the service by the end of the six-month deployment deadline.<sup>7</sup> The Commission's *Richardson Order* acknowledged that it is inefficient to require wireless carriers to waste valuable time attempting to deploy service in areas where the PSAP, because of its own or the LECs'

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<sup>7</sup> See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petition of City of Richardson, Texas, CC Docket No. 94-102, Order on Reconsideration, (Nov. 26, 2002) ("Richardson Order on Reconsideration").

unpreparedness, is not capable of receiving and utilizing the Phase II information.<sup>8</sup> In spite of Western's best efforts to deploy E911 service in response to certain PSAP requests, the ability of Western to timely deploy service will be dependent upon the completion of necessary network facility and ALI database upgrades by the PSAPs and LECs. Western has made every effort to work cooperatively with PSAPs in order to timely deploy service in accordance with Commission rules, and will continue to work with the PSAPs and LECs to resolve any issues impacting deployment of service.

Of the PSAPs that are facing LEC-related deployment issues, Western is attempting to work through the issues prior to informing them that their request for service is invalid under the *Richardson Order On Reconsideration*. In some instances, Western and the PSAP have reached an understanding on an alternative deployment agreement, which takes into account the Commission's new rules and the current situation surrounding the readiness of the vital network elements. Most PSAPs have agreed to work cooperatively with Western to overcome any potential obstacles that might delay the deployment of service. Copies of the alternative deployment agreements for Gallatin County, Montana, and Pennington County, South Dakota were submitted to the Commission in Western's first quarterly report.

On March 24, 2003, Western filed at the Commission copies of letters it sent to 10 specific E911 service-requesting PSAPs. In these letters Western indicated to the PSAPs that Western's evaluation of the PSAP's and/or LEC's capabilities resulted in an assessment that the PSAP was not currently capable of receiving or utilizing the service it requested and therefore Western deemed the request to be invalid. Of those PSAPs, half

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<sup>8</sup> See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petition of City of Richardson Texas, Order, 16 FCC Rcd 18987 (Oct. 17, 2001) ("Richardson Order").

have indicated their willingness to send Western a new request for service, and one PSAP has since been deployed live with service. Of the remaining PSAPs, Western is either continuing to work with them on deployment or the PSAPs have not responded to Western's letter.

#### **V. Phase I Requests**

Western has received 235 requests for Phase I service and is currently delivering Phase I service to 199 of the requesting counties and PSAPs. A complete listing of each of the PSAPs currently receiving Phase I service from Western is attached as Attachment B. Western is in the process of deploying Phase I service to the remaining 36 counties and PSAPs listed in Attachment C. Seven of those remaining requests have been withdrawn, are not deployable, or have otherwise been put on hold.

#### **VI. Phase II Requests**

Western's Phase II requests are much more limited than its Phase I requests. Western has received ten separate requests for Phase II service from the following counties and PSAPs: Wilbarger County, Texas; Minnesota Department of Administration (35 PSAPs); Pennington County, South Dakota; Stark County, North Dakota; Buffalo County, Nebraska; Jefferson County, Nebraska; Gallatin County, Montana; Midland County, Texas; Taylor County, Texas; and Potter-Randall County, Texas. A list of the counties and PSAPs currently receiving Phase II service from Western is in Attachment D. Additionally, the current deployment status for each of remaining Phase II requests is attached as Attachment E. In sum, Western is in compliance with its E911 Phase II deployment obligations as follows:

- The requests from Wilbarger County, Texas, Buffalo County, Nebraska, and Jefferson County, Nebraska have been rescinded by the PSAPs and Western is no longer pursuing any Phase II deployment efforts in those counties.
- In Minnesota, Western has agreed with the State 911 Director to finish its Phase I deployment prior to undertaking its full Phase II deployment testing. Furthermore, Western and Minnesota have agreed to begin Phase II deployment on a regional basis beginning in the southern portion of the state and then transitioning to the northern part of the state.
- On November 7, 2002, Western notified the Stark County Emergency Management in Stark County, North Dakota that Western's assessment of the PSAP's capability to receive Phase II service lead it to a conclusion that the PSAP's request for service was invalid and the Company would no longer be pursuing any Phase II deployment efforts until the PSAP completes (or takes steps to complete) the preparations necessary to receive and utilize the Phase II signal. To date, the PSAP has not responded to Western's notification.
- Western has reached an agreement on an alternative deployment timeline with Pennington County, South Dakota, and Gallatin County, Montana. Copies of these agreements were submitted to the Commission as part of Western's first quarterly report. These agreements reflect an understanding between Western and the PSAPs regarding the necessary elements of the Phase II network and a willingness to work together to overcome any deployment obstacles.
- Western has successfully deployed Phase II service in Midland County, Texas; Taylor County, Texas; and Potter-Randall County, Texas.

## **VII. Conclusion**

Western is currently delivering Phase II service in those areas where the PSAP has completed its necessary equipment upgrades and where the LEC infrastructure, including the ALI database, have been sufficiently upgraded to pass along the Western Phase II location information. Western remains committed to working with all of its requesting-PSAPs to deliver E911 service to them as soon as technically possible. A signed and notarized Affidavit supporting this quarterly report is attached in Attachment F.

**Attachment A**

**PSAP Letters Confirming Receipt of Service**



## MIDLAND EMERGENCY COMMUNICATION DISTRICT

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731 W. Wadley Ave., Bldg. 0-208 • Midland, Texas 79705-5357 • Fax 915-685-3719 • 915-684-9911

April 22, 2003

Nathan Glazier  
Western Wireless Corporation  
3650 131<sup>st</sup> Avenue SE, Suite 400  
Bellevue, WA 98006

Dear Nathan:

This letter will verify Western Wireless dba Cellular One has successfully implemented Phase II wireless location service in Midland County utilizing handset technology.

The accuracy level of incoming calls is very good ranging from 3 meters to 48 meters on most calls. We are experiencing no problems at this time.

Congratulations on the successful implementation of Phase II. We look forward to continuing our relationship enabling us to provide the best 9-1-1 service possible for the citizens of Midland County.

Sincerely,

A handwritten signature in blue ink that reads 'Joyce Britcher'. The signature is fluid and cursive.

Joyce Britcher  
Director of Communications



**April 21, 2003**

**Mr. Nathan Glazier  
Manager of Regulatory Affairs  
Western Wireless Corporation  
3650 131<sup>st</sup> Avenue SE, Suite 400  
Bellevue, WA 98006**

**Dear Mr. Glazier,**

**This letter confirms that Western Wireless testing has been completed for the Potter-Randall District in Texas and Phase II has successfully been deployed.**

**Our testing also confirms that based on the number of telephone calls received at this time, all calls met and exceeded the guidelines established by the FCC.**

Sincerely,

**Charlie Broomhead  
Executive Director**

**ABILENE/TAYLOR COUNTY 9-1-1 DISTRICT**

555 WALNUT STREET ROOM 206 ABILENE, TEXAS 79601 (915) 676-6674 FAX: (915) 676-6050

April 30, 2003

Mr. Nathan Glazier  
Western Wireless Corporation  
3650 131<sup>st</sup> Ave SE, Suite 400  
Bellevue, WA 98006

Re: Phase II

Dear Mr. Glazier:

This is to certify that, as of February 28, 2003, Western Wireless began providing Phase II E911 location information with 9-1-1 emergency calls as required by FCC Docket 94-102. We are experiencing no problems at this time.

We appreciate Western Wireless's deployment of Phase II service in our area.

Sincerely,



RONNIE C. KIDD  
Director  
Abilene/Taylor County 9-1-1 District

**Attachment B**

**PSAPs Currently Receiving Phase I Service**

**Western Wireless Corporation**  
E911 Phase I Service: Completed Deployments

State	County	PSAP Name	LEC	Phase I Completion Date	Phase I Status
CO	ALAMOSA	Colorado State Patrol-Alamosa	Qwest	3/26/2002	Complete
CO	BACA	Baca County SO	Qwest	3/7/2002	Complete
CO	CHAFFEE	Chaffee County SO	Qwest	3/4/2002	Complete
CO	CHEYENNE	Cheyenne County Sheriffs Office	Qwest	3/8/2002	Complete
CO	CONEJOS	Colorado State Patrol-Alamosa	Qwest	3/26/2002	Complete
CO	COSTILLA	Colorado State Patrol-Alamosa	Qwest	3/26/2002	Complete
CO	CROWLEY	Crowley County	Qwest	3/22/2002	Complete
CO	ELBERT	Elbert County Sheriff's Office	Qwest	4/22/2002	Complete
CO	KIOWA	Kiowa County Sheriff's Office	Qwest	7/31/2000	No Sites
CO	KIT CARSON	Kit Carson County Dispatch Board	Qwest	3/8/2002	Complete
CO	LAS ANIMAS	Trinidad PD	Qwest	4/17/2002	Complete
CO	MINERAL	Colorado State Patrol-Alamosa	Qwest	3/26/2002	Complete
CO	OTERO	La Junta PD	Qwest	3/20/2002	Complete
CO	PROWERS	Prowers County Combined Communications	Qwest	3/4/2002	Complete
CO	RIO GRANDE	Colorado State Patrol-Alamosa	Qwest	3/26/2002	Complete
CO	SAGUACHE	Colorado State Patrol-Alamosa	Qwest	3/26/2002	Complete
IA	CRAWFORD	Crawford County SO	Qwest	9/19/2001	Complete
IA	HARRISON	Harrison County SO	Qwest	1/8/2002	Complete
IA	MONONA	Monona County SO	Qwest	9/19/2001	Complete
IA	SHELBY	Shelby County EMA 9-1-1	Qwest	1/8/2002	Complete
IA	WOODBURY	Woodbury County SO	Qwest	9/17/2001	Complete
KS	DICKINSON	Dickinson County Emergency Communications Center	SWBT	4/7/2003	Complete
KS	RILEY	Riley County 9-1-1	SWBT	7/9/2002	Complete
KS	SALINE	Salina Police Department	SWBT	3/5/2003	Complete
MN	BROWN	Brown County SO	IES	4/14/2003	Complete
MN	CHIPPEWA	Chippewa County SO	IES/MCI	4/16/2003	Complete
MN	COTTONWOOD	Cottonwood County SO	IES	4/15/2003	Complete
MN	JACKSON	Jackson County Sheriffs Department	IES	4/15/2003	Complete
MN	KANDIYOH	Kandiyohi County Sheriffs Department	IES/MCI	4/16/2003	Complete
MN	KITTSO	Kittson County	IES	4/18/2003	Complete
MN	LAKE OF THE WOODS	Lake of the Woods County Sheriff	IES	4/18/2003	Complete
MN	LE SUEUR	Le Sueur PD	IES/MCI	4/14/2003	Complete
MN	LYON	Lyon County Sheriffs Office	IES/MCI	4/15/2003	Complete
MN	MARSHALL	Marshall County Sheriffs Office	IES	4/18/2003	Complete
MN	MARTIN	Martin County Law Enforcement Center	IES	4/14/2003	Complete
MN	MCLEOD	Hutchinson PD	IES/MCI	4/15/2003	Complete
MN	MCLEOD	Mcleod County Sheriffs Department	IES/MCI	4/15/2003	Complete
MN	MEEKER	Meeker County Sheriffs Department	IES/MCI	4/16/2003	Complete
MN	NICOLLET	Nicollet County Sheriffs Department	IES/MCI	4/15/2003	Complete
MN	NOBLES	Nobles County Sheriffs Department	IES/MCI	4/15/2003	Complete
MN	PENNINGTON	Pennington County Sheriffs Department	IES	4/17/2003	Complete
MN	POLK	Polk County Emergency Service	IES	4/16/2003	Complete
MN	RED LAKE	Red Lake County Sheriffs Department	IES	4/16/2003	No Sites
MN	RENVILLE	Renville County Sheriff	IES/MCI	4/15/2003	Complete
MN	ROSEAU	Roseau County Sheriffs Department	IES	4/18/2003	Complete
ND	DUNN (see Stark Cty)	Stark-Dunn E9-1-1	Qwest	4/3/2002	Complete
ND	STARK	Stark-Dunn E9-1-1	Qwest	4/3/2002	Complete
NE	BOYD	Boyd County Sheriff	Qwest	3/26/2003	No Sites
NE	BUFFALO	Buffalo County Sheriffs Office	Qwest	3/22/2002	Complete
NE	CEDAR	Cedar County Sheriffs Office	Qwest	6/25/2002	Complete
NE	CHASE	Chase County 9-1-1	Qwest	2/5/2003	Complete
NE	CLAY	Clay County Sheriff's Office	Qwest	7/25/2001	No Sites
NE	CUMING	Cuming County E9-1-1 Communications	Qwest	6/25/2002	Complete
NE	CUSTER	Custer County Sheriffs Department	Qwest	2/22/2002	Complete
NE	DAKOTA	Dakota County Comm. (Calls route to Woodbury County, IA)	Qwest	9/17/2001	Complete
NE	DAWSON	Gothenburg Police	Qwest	1/8/2002	Complete
NE	DAWSON	Dawson County Sheriffs Office	Qwest	7/26/2002	Complete
NE	DODGE	Fremont Police Department	Qwest	1/30/2003	Complete
NE	DODGE	Dodge County Sheriff	Qwest	1/9/2003	Complete
NE	FURNAS	Furnas County Sheriffs Department	Qwest	2/20/2003	Complete
NE	HARLAN	Holdrege Police Department	Qwest	2/18/2003	Complete
NE	HOLT	Boyd-Holt Joint 9-1-1 Center	Qwest	3/26/2003	Complete

**Western Wireless Corporation**  
E911 Phase I Service: Completed Deployments

NE	KEARNEY	Kearney County Sheriff	Qwest	4/15/2003	Complete
NE	HALL	Grand Island-Hall County	Qwest	7/26/2002	Complete
NE	HOWARD	Howard County Communications Center	Qwest	7/16/2002	Complete
NE	JEFFERSON	Jefferson County 9-1-1 Center	Alltel	1/29/2003	Complete
NE	KEITH	Keith County Communications	Qwest	10/8/2002	Complete
NE	MERRICK	Merrick County Sherrifs Office	Qwest	7/26/2002	Complete
NE	PHELPS	Holdrege Police Department	Qwest	2/18/2003	Complete
SD	DAVISON	Mitchell PD	Qwest	3/24/2003	Complete
SD	MINNEHAHA	Minnehaha County Metro Communications	Qwest	3/6/2003	Complete
SD	MOODY	Moody County Sheriffs Department	Qwest	2/18/2003	Complete
SD	PENNINGTON	Pennington County ESCC	Qwest	Mar-01	Complete
TX	ANDREWS	Andrews County Sheriff's Office	SWBT	5/20/2002	Complete
TX	ARCHER	Archer SO	SWBT	7/23/2002	Complete
TX	ARMSTRONG	Armstrong County Sheriff's Office	SWBT	2/1/2000	No Sites
TX	BAILEY	Muleshoe PD	Verizon	10/1/2001	Complete
TX	BAYLOR	Baylor SO	SWBT	1/31/2001	Complete
TX	BORDEN		SWBT	2/1/2000	No Sites
TX	BREWSTER	Alpine PD	SWBT	1/31/2001	Complete
TX	BRISCOE	Calls route to Tulia PD in Swisher County	SWBT	1/31/2001	Complete
TX	CALLAHAN	Callahan SO	SWBT	12/21/2000	Complete
TX	CAMP	Camp County SO	SWBT	3/25/2003	Complete
TX	CARSON	Carson SO	SWBT	1/31/2001	Complete
TX	CASS	Atlanta PD	SWBT	12/10/2002	Complete
TX	CASS	Cass County SO	Verizon	3/25/2003	Complete
TX	CASTRO	Castro SO	SWBT	1/31/2001	Complete
TX	CHILDRESS	Childress PD	SWBT	1/31/2001	Complete
TX	COCHRAN	Cochran SO	Valor	9/5/2001	Complete
TX	COKE	West Coke County Nursing Home	GTE	4/5/2002	Complete
TX	COLLINGSWORTH	Collingsworth SO	SWBT	1/31/2001	Complete
TX	CRANE	Crane Police Department	SWBT	1/31/2001	Complete
TX	CROCKETT	Crockett SO	GTE	3/8/2002	Complete
TX	CROSBY	Crosby SO	SWBT	9/5/2001	Complete
TX	CULBERSON	Culberson SO	SWBT	12/6/2001	Complete
TX	DALLAM	Dalhart PD	SWBT	1/31/2001	Complete
TX	DALLAM	Dallam SO	SWBT	1/31/2001	Complete
TX	DAWSON	Lamesa PD	SWBT	1/22/2002	Complete
TX	DEAF SMITH	Hereford PD	SWBT	1/31/2001	Complete
TX	DELTA	Delta SO	Verizon	1/7/2003	Complete
TX	DICKENS	Dickens SO	GTE	10/4/2001	Complete
TX	DONLEY	Donley SO	SWBT	11/19/2001	Complete
TX	ECTOR	Odessa Communications Center	SWBT	9/28/2001	Complete
TX	FANNIN	Bonham PD	SWBT	8/27/2002	Complete
TX	FISHER	Fisher SO	SWBT	12/20/2000	Complete
TX	FLOYD	Floyd SO	SWBT	9/5/2001	Complete
TX	FOARD	Hardeman SO	SWBT	7/23/2002	No Sites
TX	FRANKLIN	Franklin SO	Verizon	3/25/2003	Complete
TX	GAINES	Gaines County Sheriffs Office	SWBT	1/31/2001	Complete
TX	GARZA	Garza SO	GTE	10/5/2001	Complete
TX	GLASSCOCK	Sites routing to Martin County Sheriffs Office	SWBT	3/8/2002	Complete
TX	GRAY	Pampa PD	SWBT	1/31/2001	Complete
TX	HALE	Plainview PD	SWBT	2/15/2003	Complete
TX	HALE	Hale SO	SWBT	9/5/2001	Complete
TX	HALL	Hall County Sheriff's Office	SWBT	2/1/2000	No Sites
TX	HANSFORD	Hansford SO	SWBT	1/31/2001	Complete
TX	HARDEMAN	Hardeman County SO	SWBT	7/23/2002	Complete
TX	HARTLEY	Calls route to Dalhart PD in Dallam County	SWBT	1/31/2001	Complete
TX	HASKELL	Haskell SO	SWBT	12/20/2000	Complete
TX	HEMPHILL	Hemphill SO	SWBT	1/31/2001	Complete
TX	HIDALGO	Alamo PD	SWBT	1/31/2001	Complete
TX	HIDALGO	Donna PD	SWBT	1/31/2001	Complete
TX	HIDALGO	Edinburg PD	SWBT	1/31/2001	Complete
TX	HIDALGO	Hidalgo PD	SWBT	1/31/2001	Complete
TX	HIDALGO	Hidalgo SO	SWBT	1/31/2001	Complete
TX	HIDALGO	McAllen PD	SWBT	1/31/2001	Complete

**Western Wireless Corporation**  
E911 Phase I Service: Completed Deployments

TX	HIDALGO	Mission PD	SWBT	1/31/2001	Complete
TX	HIDALGO	Palmview PD	SWBT	1/31/2001	Complete
TX	HIDALGO	Pharr PD	SWBT	1/31/2001	Complete
TX	HIDALGO	Weslaco PD	SWBT	1/31/2001	Complete
TX	HOCKLEY	Levelland PD	SWBT	10/3/2001	Complete
TX	HOPKINS	Sulphur Springs PD	Verizon	12/11/2002	Complete
TX	HOPKINS	Hopkins County SO	Verizon	2/1/2000	No Sites
TX	HOWARD	Howard County 9-1-1 Communication District	SWBT	11/1/2001	Complete
TX	HUDSPETH	Hudspeth County SO	SWBT	3/19/2002	Complete
TX	HUNT	Greenville PD	SWBT	8/21/2002	Complete
TX	HUNT	Hunt County SO	SWBT	8/21/2002	Complete
TX	HUNT	Commerce PD	SWBT	2/1/2000	No Sites
TX	HUTCHINSON	Borger PD	SWBT	1/31/2001	Complete
TX	IRION	Irion County SO	GTE	3/8/2002	Complete
TX	JEFF DAVIS	Jeff Davis County SO (Calls routed to Presidio & Culberson)	SWBT	12/6/2001	Complete
TX	JONES	Jones County Comm Center	SWBT	12/20/2000	Complete
TX	KENT	Calls route to Dickens County Sheriff's Office	GTE	10/4/2001	Complete
TX	KING	Calls route to Dickens County Sheriff's Office	GTE	10/4/2001	Complete
TX	KNOX	Knox Central Dispatch	SWBT	12/20/2000	Complete
TX	LAMAR	Paris PD	SWBT	7/26/2002	Complete
TX	LAMB	Littlefield PD	Valor	9/5/2001	Complete
TX	LIPSCOMB	Lipscomb SO	SWBT	10/11/2002	Complete
TX	LOVING		SWBT	2/1/2000	No Sites
TX	LUBBOCK	Lubbock PD	SWBT	2/28/2001	Complete
TX	LYNN	Lynn County Sheriffs Office	GTE	10/3/2001	Complete
TX	MARION	Marion SO	SWBT	3/25/2003	Complete
TX	MARTIN	Martin County Sheriffs Office	SWBT	1/31/2001	Complete
TX	MIDLAND	Midland Emergency Communications District	SWBT	10/25/2001	Complete
TX	MITCHELL	Colorado City PD	SWBT	12/21/2000	Complete
TX	MOORE	Moore SO	SWBT	1/31/2001	Complete
TX	MORRIS	Morris SO	Verizon	3/25/2003	Complete
TX	MOTLEY	Floyd County SO (Calls route to Swisher County)	SWBT	1/31/2001	Complete
TX	NOLAN	Sweetwater PD	SWBT	1/17/2001	Complete
TX	OCHILTREE	Perryton PD	SWBT	1/31/2001	Complete
TX	OLDHAM	Oldham SO	SWBT	1/31/2001	Complete
TX	PARMER	Friona PD	SWBT	1/31/2001	Complete
TX	PECOS	FT Stockton PD	SWBT	1/31/2001	Complete
TX	POTTER	Potter County Sheriffs Department	SWBT	2/25/2003	Complete
TX	PRESIDIO	Presidio SO	SWBT	1/31/2001	Complete
TX	POTTER / RANDALL	Amarillo Police Department	SWBT	2/25/2003	Complete
TX	RAINS	Rains SO	Verizon	12/12/2002	Complete
TX	RANDALL	Randall County Sheriffs Department	SWBT	2/25/2003	Complete
TX	REAGAN	Reagan SO	Verizon	3/8/2002	Complete
TX	RED RIVER	Clarksville PD	Verizon	3/25/2003	Complete
TX	REEVES	Pecos Police Department	SWBT	2/1/2002	Complete
TX	ROBERTS	Roberts County SO	SWBT	3/8/2002	Complete
TX	SCHLEICHER	Schleicher County SO	Verizon	4/1/2002	Complete
TX	SCURRY	Scurry SO	SWBT	12/20/2000	Complete
TX	SHACKELFORD	Shackelford County Sheriffs Office	SWBT	1/31/2001	Complete
TX	SHERMAN	Sherman County SO	SWBT	5/1/2002	Complete
TX	STEPHENS	Breckenridge PD	SWBT	3/8/2002	Complete
TX	STERLING	Country Doctors Inn	Verizon	3/8/2002	Complete
TX	STONEWALL	Stonewall SO	SWBT	12/21/2000	Complete
TX	SUTTON	Sutton County SO	Verizon	3/8/2002	Complete
TX	SWISHER	Tulia PD	SWBT	1/31/2001	Complete
TX	TAYLOR	Abilene PD	SWBT	5/31/2001	Complete
TX	TERRELL	Terrell County SO	SWBT	8/16/2002	Complete
TX	TERRY	Brownfield PD	Valor	10/3/2001	Complete
TX	THROCKMORTON	Throckmorton SO	SWBT	1/17/2001	Complete
TX	TITUS	Mt. Pleasant PD	SWBT	11/14/2002	Complete
TX	TOM GREEN	San Angelo Comm Center / San Angelo EOC	Verizon	4/2/2002	Complete
TX	UPSHUR	Upshur County SO	Verizon	3/12/2003	Complete
TX	UPTON	Upton County Sheriff's Department	SWBT	1/31/2001	Complete
TX	WARD	Monahans Police Department	SWBT	1/31/2001	Complete

**Western Wireless Corporation**  
**E911 Phase I Service: Completed Deployments**

TX	WHEELER	Shamrock PD	SWBT	12/17/2002	Complete
TX	WHEELER	Wheeler SO	SWBT	1/31/2001	Complete
TX	WILBARGER	Vernon PD	SWBT	1/31/2001	Complete
TX	WINKLER	Kermit Police Department	SWBT	1/31/2001	Complete
TX	WOOD	Wood County SO	Verizon	3/13/2003	Complete
TX	YOAKUM	Denver City PD	Valor	10/3/2001	Complete
TX	YOUNG	Young SO	SWBT	1/31/2001	Complete
WY	ALBANY	Laramie-Albany County Records and Communications	Qwest	12/20/2002	Complete
WY	NATRONA	Casper Public Safety Communications Center	Qwest	1/8/2003	Complete

**Attachment C**

**PSAP Phase I Requests Currently Being Deployed**

**Western Wireless Corporation**  
E911 Phase I Service: Deployments in Progress

State	County	PSAP Name	LEC	Phase I Status
AR	COLUMBIA	Columbia Central Dispatch	SWBT	In Process
AR	LAFAYETTE	Lafayette County SO	SWBT	In Process
AZ	GRAHAM	Graham County Sheriff's Office	Qwest	In Process
CO	BENT	Bent County Sheriffs Office	Qwest	Withdrawn
CO	FREMONT	Canon City Police Department	Qwest	In Process
MN	BLUE EARTH	Minnesota State Patrol - Mankato	Qwest	In Process
MN	CLAY	Clay County Law Enforcement Center	Qwest	In Process
MN	CLEARWATER	Clearwater County SO	IES	In Process
MN	LAC QUI PARLE	LAC QUI PARLE Sheriffs Office	IES	In Process
MN	LINCOLN	Marshall District MN State Patrol	MCI/Qwest	In Process
MN	LYON	Lyon County & MRSP	IES/MCI	In Process
MN	MAHNOMEN	Mahnomen County Sheriffs Department	IES	In Process
MN	MURRAY	Marshall District MN State Patrol	IES	In Process
MN	NORMAN	Norman County Sheriffs Department	IES	In Process
MN	PIPESTONE	Marshall District MN State Patrol	MCI/Qwest	In Process
MN	REDWOOD	Marshall District MN State Patrol	MCI/Qwest	In Process
MN	ROCK	Marshall District MN State Patrol	MCI/Qwest	In Process
MN	SIBLEY	Sibley County Sheriffs Department	IES/MCI	In Process
MN	WATONWAN	Minnesota State Patrol - Mankato	Qwest	In Process
MN	YELLOW MEDICINE	Yellow Medicine	Qwest	In Process
MT	GALLATIN	Gallatin County-City of Bozeman 9-1-1	Qwest	In Process
MT	GLACIER	Glacier County Sheriffs Office	Qwest	Not Deployable
MT	MISSOULA	Missoula County 9-1-1 Center	Qwest	Not Deployable
MT	YELLOWSTONE	Billings City-County 9-1-1 Center	Qwest	Withdrawn
NE	CASS	Cass County Sheriff's Department		Not Deployable
NE	LINCOLN	North Platte Police Department	Qwest	In Process
NE	MADISON	Norfolk 9-1-1 Comm Center	Qwest	Not Deployable
NE	PLATTE	Columbus Police	Qwest	In Process
NE	SALINE	Saline County Sheriff	Alltel	In Process
NE	WASHINGTON	Washington County Communications	Qwest	In Process
ND	GRAND FORKS	Grand Forks County PSAP	Qwest	Not Deployable
SD	BROWN	Brown County Regional Communications Center	Qwest	In Process
SD	LAWRENCE	Lawrence County Sheriffs Office	Qwest	In Process
SD	LAWRENCE	Spearfish Police Department	Qwest	In Process
SD	MEADE	Meade County Sheriffs Office	Qwest	In Process
TX	COTTLE	Paducah Police Department	SWBT	In Process

**Attachment D**

**PSAPs Currently Receiving Phase II Service**

**Western Wireless Corporation**  
E911 Phase II Service: Completed Deployments

State	County	PSAP Name	LEC	Phase I Completion Date	Phase I Status	Phase II Completion Date	Phase II Status
TX	MIDLAND	Midland Emergency Communications District	SWBT	10/25/2001	Complete	Feb. 2003	Complete
TX	POTTER	Potter County Sheriffs Department	SWBT	2/25/2003	Complete	Mar. 2003	Complete
TX	POTTER / RANDALL	Amarillo Police Department	SWBT	2/25/2003	Complete	Mar. 2003	Complete
TX	RANDALL	Randall County Sheriffs Department	SWBT	2/25/2003	Complete	Mar. 2003	Complete
TX	TAYLOR	Abilene PD	SWBT	5/31/2001	Complete	Feb. 2003	Complete

**Attachment E**

**PSAP Phase II Requests Currently Being Deployed**

**Western Wireless Corporation**  
E911 Phase II Service: Deployments in Progress

State	County	PSAP Name	LEC	Phase I Status	Phase II Status
MN	BELTRAMI	Beltrami County Law Enforcement Center	IES	In Process	In Process
MN	BROWN	Brown County SO	IES	Complete	In Process
MN	CHIPPEWA	Chippewa County SO	IES/MCI	Complete	In Process
MN	CLAY	Clay County Law Enforcement Center	Qwest	In Process	In Process
MN	CLEARWATER	Clearwater County SO	IES	In Process	In Process
MN	COTTONWOOD	Cottonwood County SO	IES	Complete	In Process
MN	JACKSON	Jackson County Sheriffs Department	IES	Complete	In Process
MN	KANDIYOHI	Kandiyohi County Sheriffs Department	IES/MCI	Complete	In Process
MN	KITTSOON	Kittson County	IES	Complete	In Process
MN	LAC QUI PARLE	LAC QUI PARLE Sheriffs Office	IES	In Process	In Process
MN	LAKE OF THE WOODS	Lake of the Woods County Sheriff	IES	Complete	In Process
MN	LE SUEUR	Le Seuer PD	IES/MCI	Complete	In Process
MN	LINCOLN	Marshall District MN State Patrol	MCI/Qwest	In Process	In Process
MN	LYON	Lyon County Sheriffs Office	IES/MCI	In Process	In Process
MN	LYON	Lyon County & MRSP	IES/MCI	In Process	In Process
MN	MAHNOMEN	Mahnomen County Sheriffs Department	IES	In Process	In Process
MN	MARSHALL	Marshall County Sheriffs Office	IES	Complete	In Process
MN	MARTIN	Martin County Law Enforcement Center	IES	Complete	In Process
MN	MCLEOD	Hutchinson PD	IES/MCI	Complete	In Process
MN	MCLEOD	Mcleod County Sheriffs Department	IES/MCI	Complete	In Process
MN	MEEKER	Meeker County Sheriffs Department	IES/MCI	Complete	In Process
MN	MURRAY	Marshall District MN State Patrol	IES	In Process	In Process
MN	NICOLLET	Nicollet County Sheriffs Department	IES/MCI	Complete	In Process
MN	NOBLES	Nobles County Sheriffs Department	IES/MCI	Complete	In Process
MN	NORMAN	Norman County Sheriffs Department	IES	In Process	In Process
MN	PENNINGTON	Pennington County Sheriffs Department	IES	Complete	In Process
MN	PIPESTONE	Marshall District MN State Patrol	MCI/Qwest	In Process	In Process
MN	POLK	Polk County Emergency Service	IES	Complete	In Process
MN	RED LAKE	Red Lake County Sheriffs Department	IES	No Sites	In Process
MN	REDWOOD	Marshall District MN State Patrol	MCI/Qwest	In Process	In Process
MN	RENVILLE	Renville County Sheriff	IES/MCI	Complete	In Process
MN	ROCK	Marshall District MN State Patrol	MCI/Qwest	In Process	In Process
MN	ROSEAU	Roseau County Sheriffs Department	IES	Complete	In Process
MN	SIBLEY	Sibley County Sheriffs Department	IES/MCI	In Process	In Process
MN	WATONWAN	Minnesota State Patrol - Mankato	Qwest	In Process	In Process
MN	YELLOW MEDICINE	Yellow Medicine	Qwest	In Process	In Process
MT	GALLATIN	Gallatin County-City of Bozeman 9-1-1	Qwest	In Process	In Process
NE	BUFFALO	Buffalo County Sheriffs Office	Qwest	Complete	Withdrawn
NE	JEFFERSON	Jefferson County 9-1-1 Center	ALLTEL	Complete	Withdrawn
ND	STARK	Stark-Dunn E9-1-1	Qwest	Complete	In Process
SD	PENNINGTON	Pennington County ESCC	Qwest	Complete	In Process
TX	WILBARGER	Vernon PD	SWBT	Complete	Withdrawn

**Attachment F**

**Affidavit**

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

In the matter of

)  
Revision of the Commission's Rules To )  
Ensure Compatibility with Enhanced 911 )  
Emergency Calling Systems )

CC Docket No. 94-102

AFFIDAVIT OF GENE DEJORDY

Before me, the undersigned authority, on this 1 day of May 2003,  
personally appeared Gene DeJordy representing Western Wireless Corporation  
("Western") who, upon being by me duly sworn on oath deposed and said the following

1 My name is Gene DeJordy am over the age of 21, of sound mind, and  
competent to testify as to the matters stated herein. My position with Western is Vice President  
of Regulatory Affairs. In that position, assisted in the preparation and completion of the  
Enhanced 911 Phase II Quarterly Report of Western Wireless Corporation

2 Western is engaged in deploying E911 Phase I and Phase II service throughout  
many counties in the western United States. It has already successfully deployed Phase I service  
and Phase II service. This Report is a correct and accurate assessment of the status of each of  
the requests for E911 service that Western has received.

Further Affiant sayeth not.

  
Gene DeJordy

Sworn and Subscribed to before me this 1 day of May, 2003 to certify  
which witness my hand.

  
Lori Dierst

Notary Public in and for the State of Washington

My Commission Expires 10 04

