

ALLTEL Communications, Inc.
E-911
Third Quarterly Report
CC Docket No. 94-102
May 1, 2003

Introduction

ALLTEL Communications, Inc. (“ACI”) is a cellular and PCS provider subject to the Phase II deployment requirements for Tier II carriers as contained in the Commission’s Order to Stay, CC Docket No. 94-102, 17 FCC Rcd 14841 (2002) (“Stay Order”). ACI has chosen an AGPS handset-based location technology to comply with the Phase II E-911 requirements. Under the terms of the Stay Order, ACI was required to begin selling and activating location capable handsets no later than March 1, 2003, and is required to begin delivering Phase II enhanced service to PSAPs by the later of six months of a bona fide PSAP request or March 1, 2003. ALLTEL has met its handset deployment threshold, and is implementing Phase I and Phase II service to PSAPs in accord with the activation time frames negotiated with the PSAPs. The instant report is submitted pursuant to paras. 28-31 of the Stay Order.

ACI has continued to actively engage the PSAPs within its market areas to ensure timely activation of both Phase I and Phase II E-911 services as early as possible given the status and readiness of the particular PSAP, the availability of vendor equipment and LEC upgrades, as well as the Commission’s deadlines for Phase II E-911 under the Stay Order.

I. Phase II AGPS Network Deployments

ACI notes that various parts of its multi-vendor network, including handsets, cell sites, switches and the PDE/MPC, must all properly interface to provide seamless and reliable location data. ACI summarizes the status of the necessary network upgrades and deployments required for it to provide Phase II functions.

Switch Upgrades. ACI’s network contains switches from each of the major vendors – Lucent, Nortel and Motorola. ACI has completed the software loads in its switches and cell sites as required and has tested its AGPS solution in selected markets served by each type of switch.

MPC/PDE. The redundant MPC/PDEs has been deployed and tested, and is fundamentally stable. Redundant trunking between the units has been implemented. ALLTEL has configured its system consistent with the standard E-2 interface and has completed testing. As discussed below, and as the Commission has acknowledged, further real-world testing of the MPC/PDE is necessary on a PSAP-by-PSAP basis to ensure end-to-end functionality. ACI is engaged in such testing with capable PSAPs prior to cutting to live service.

II. Handset Deployment

The Stay Order requires that ACI, as a Tier II carrier, begin selling and activating ALI-capable handsets by March 1, 2003. As previously reported, ALLTEL began deploying and activating its first ALI capable handsets in its markets on June 30, 2002 in compliance with this requirement. It fully expects to meet the May 31, 2003 handset deployment threshold (25% of new activations) and continues to target end of 3Q 2003 for reaching the 100% of digital handset deployment threshold. The following is a summary list of AGPS enabled handsets distributed by ALLTEL and their launch dates:

Audiovox 9155	6/30/02
Kyocera 2325	10/4/02
Motorola 120e	10/10/02
Kyocera 7135	11/02
Audiovox 9500	11/02
Toshiba CDM9500	11/02
Kyocera 3225	3/03
Motorola T720	2/03
NOKIA 3585I	mid June 2003
Motorola V60x	August, 2003.

III. Accuracy Requirements and Methodology

ACI's extensive testing and evaluation processes were previously reported and detailed in its First and Second Reports. ACI has transitioned from testing and evaluation of its AGPS solution, which ACI believes is compliant with the Commission's rules and consistent with OET Bulletin 71, to real-world deployment of its technology in response to valid PSAP requests. ACI has contracted with TechnoCom to develop procedures and provide assistance to establish proper techniques to configure each cell site and sector as well as to ensure accurate delivery of Phase II location information to capable PSAPs. ACI and TechnoCom are working closely with individual capable PSAPs to further test and refine the accuracy and reliability of its solution, taking into account the particulars of each individual PSAP's network and capabilities. In all markets in which PSAPs have requested service ACI is capable of transmitting Phase II-compliant ALI to the PSAP for all of its MSC vendors – Lucent, Nortel and Motorola. As discussed below, additional testing is required as individual PSAPs complete their own upgrades and deployment proceeds on a PSAP by PSAP basis. Finally, ACI continues to test new ALI-capable handsets prior to their acceptance into its product line to establish benchmarks for Phase II location accuracy.

IV. Deployment Issues

As previously reported, ACI has encountered the same PSAP, vendor and LEC issues as well as the technology hurdles normally experienced with the initial deployment of a maturing technology. These issues have arisen in both the Phase I and Phase II

contexts. Many of these hurdles have since been overcome in most markets, and ACI believes that in most markets, remaining problems can continue to be resolved in time for timely deployment of Phase II to PSAPs.

ACI has aggressively worked to resolve the previously reported integration problems with the PDE and MPC products. These problems involved interpretation of standardized interfaces between different vendor platforms and the fact that commercial test equipment to verify and assist in the deployment of this AGPS technology was still being developed. Testing equipment is now available, and ACI has since been able to resolve many of these issues, particularly in its Lucent and Nortel markets. Developing the test method for the Motorola markets has proven more difficult, but ACI nevertheless expects that the deficiencies experienced can be resolved well in advance to meet the required target dates for launching service to individual capable PSAPs.

V. Status of Phase I and Phase II Deployment Efforts.

ACI continues to strive for early E-911 deployment. Substantial progress has been made in its efforts to deploy Phase I and Phase II service. For example, ALLTEL had deployed Phase II in four markets as of its Second Quarterly Report. ALLTEL reports herein that over seventy PSAPs have now been cut-live with Phase II service. Additional markets are moving toward live Phase II deployment rapidly and ACI has established good working relationships with the PSAPs in its markets.

A. Phase I

ALLTEL has deployed Phase I service in response to approximately 455 PSAP requests. ALLTEL has approximately 129 PSAP requests for Phase I in progress. Of this number, approximately 97 are currently in process with implementation scheduled for the agreed upon deployment date listed in the attached spreadsheets. 32 requests remain pending due to the various reasons delineated in the "Notes" section of the attached spreadsheets.

B. Phase II

To date ALLTEL has received 146 Phase II requests. Of this number, 70 requests have been met and service has been cut-live, while 76 requests remain pending with deployment scheduled for the agreed upon dates listed on the attached spreadsheets.

Detailed spreadsheets on both Phase I and Phase II deployment schedules are contained in the appendices to this filing. ALLTEL would be pleased to provide the Commission with such additional information as it may require.

C. General Condition

Technology issues for ACI's multi-vendor network have largely been resolved, and ALLTEL is working aggressively on a PSAP-by-PSAP basis and is cautiously

optimistic that Phase II deployment will expedite even further in the coming months. It is likely, however, that some minor delays will result in Phase II service in some markets. As of March 1, 2003, ACI had have taken all the steps not dependent on PSAP readiness: it had completed all hardware and software upgrades necessary in its own network and completed testing; accounted for all trunking between its system to the selective router and the ALI database; and established and maintained contact with the PSAPs to obtain any necessary information. *Order on Reconsideration*, FCC 02-318, ¶ 21 (rel. Nov. 26, 2002) (“*Richardson Recon Order*”), to be codified at 47 C.F.R. § 20.18(j)(4)(vi). As discussed below, however, full end-to-end testing requires PSAP participation.

ACI has learned that further refinements are necessary during the final deployment stages, as each PSAP’s network and equipment is different. Sometimes ACI learns that a modification in its own network is required; other times, an upgrade or modification to the PSAP’s CPE may be required. In any event, coordination with PSAPs is required throughout the troubleshooting process, including: determining which link in the presentation chain is the source of the malfunction; assembling the appropriate personnel; planning and executing live calls from within a sector; and adjustments to ensure that ALI data can be “pulled” via the interface; and developing MPC patches and enhancements to accommodate multiple bids from LEC systems. Moreover, each individual launch effort requires a “true-up and re-test” to ensure that the Phase II solution reflects the current state of ACI’s network. Even if the PSAP is not Phase II-capable, ACI will work above-and-beyond its obligations to help the PSAP assess its shortcomings to ensure progress toward Phase II development. New data management systems and processes to address these issues are under development.

Because of its demonstrated good faith efforts in coordinating and testing with PSAPs, ACI and the PSAPs have arrived at mutually agreed upon launch dates. *See Richardson Recon Order*, to be codified at 47 C.F.R. § 20.18(j)(4)(vi). Nevertheless, in some markets there is a chance that ACI will encounter unforeseen delay in implementation and consequently may need to seek specific and limited relief from deployment deadlines. ACI’s good faith efforts warrant Commission flexibility as ACI works through the PSAP-specific issues that will arise during final end-to-end testing with PSAPs.¹

ACI would be pleased to provide the Commission with such additional information as it may require.

¹ As the Commission has acknowledged, an additional period of time is required between the time the PSAP becomes E-911 capable and the date of service launch. *See Richardson Recon. Order*, to be codified at 47 C.F.R. § 20.18(j)(4)(x) (affording certifying carriers 90 days to provide E911 service after the PSAP becomes capable).

VI. Declaration

I have read the foregoing E-911 Third Quarterly Report of ALLTEL Communications, Inc. and declare under penalty of perjury that it is true and correct to the best of my information and belief. Executed May 1, 2003.

/s/ _____
Glenn S. Rabin
Vice President
Federal Communications Counsel
ALLTEL Communications, Inc.

CERTIFICATE OF SERVICE

I, Glenn S. Rabin, hereby certify that on the 1st day of May, 2003, I caused copies of the foregoing "Third Quarterly Report" to be sent to the following by first class mail, postage pre-paid, to the following:

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