

94-102

LUKAS, NACE, GUTIERREZ & SACHS
CHARTERED
1111 NINETEENTH STREET, N.W.
SUITE 1200
WASHINGTON, D.C. 20036
(202) 857-3500

ORIGINAL

RUSSELL D. LUKAS
DAVID L. NACE
THOMAS GUTIERREZ
ELIZABETH R. SACHS
GEORGE L. LYON, JR.
JOEL R. KASWELL
PAMELA L. GIST
DAVID A. LAFURIA
MARILYN SUCHECKI MENSE
B. LYNN F. RATNAVALE
TODD SLAMOWITZ
DAVID M. BRIGLIA
ALLISON M. JONES
STEVEN M. CHERNOFF
+ NOT ADMITTED IN D.C.

RECEIVED

MAY 23 2003

May 23, 2003 Federal Communications Commission
Office of Secretary

CONSULTING ENGINEERS
ALI KUZEHKANANI
LEROY A. ADAM
LEILA REZANAVAZ
—
OF COUNSEL
JOHN J. MCAVOY
J.K. HAGE III+
LEONARD S. KOLSKY+
—
TELECOPIER
(202) 857-5747
—
Email: lngs@fcclaw.com
http://www.fcclaw.com
—
WRITER'S DIRECT DIAL

DUCKET FILE COPY ORIGINAL

(202) 828-9473
pgist@fcclaw.com

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

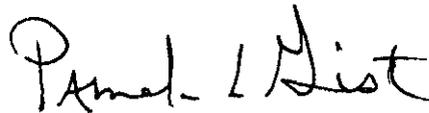
Re: Amendment of E-911 Phase 2 Implementation Plan
North Carolina RSA 3 Cellular Telephone Company
d/b/a Carolina West Wireless
TRS # 801552

Dear Ms. Dortch:

On behalf of the above-referenced carrier, and pursuant to Section 20.18(i) of the Commission's Rules, enclosed is a narrative statement regarding the company's amended E-911 Phase 2 implementation plan.

If you have any questions regarding this filing, please contact the undersigned.

Very truly yours,



Pamela L. Gist

c: Qualex International (w/ enc. on diskette)
Policy Division, Wireless Telecommunications Bureau, FCC (w/ enclosure)

**NORTH CAROLINA RSA 3 CELLULAR TELEPHONE COMPANY
d/b/a CAROLINA WEST WIRELESS**

Amended E-911 Phase II Implementation Plan Report

RECEIVED

MAY 23 2003

Federal Communications Commission
Office of Secretary

Background/Contact Information

(1) **Carrier Identifying Information**

North Carolina RSA 3 Cellular Telephone Company
d/b/a Carolina West Wireless
TRS # 801552

(2) **Contact Information**

William R. Crownfield, Project Coordinator
Box 275
Dobson, North Carolina 27017
Phone 336-386-8713
Fax 336-386-4539
Email: bcrownfield@surry.net

E911 Phase II Location Technology Information

(1) **Type of Technology**

North Carolina RSA 3 Cellular Telephone Company d/b/a Carolina West Wireless ("Carolina West") provides wireless services using a combination of AMPS and TDMA. Deployment of CDMA as an overlay of TDMA technology in Carolina West's service area will begin to take place as part of an ongoing effort to adapt to current market conditions and allow for roaming in an environment where several larger wireless carriers have announced plans to discontinue use of TDMA technology.

Carolina West has come to consider a handset-based technology to be the most practical means to make available Phase II services in its operating areas. The lack of availability from manufacturers of equipment capable of meeting the Phase II location accuracy requirements has become a major obstacle to the successful deployment of a network-based technology in Carolina West's service area. Grayson Wireless has not been able to promise delivery of Phase II capable equipment (nor of TDMA compatible handsets) with any guarantee that such equipment would meet

the FCC's location accuracy requirements. True Positions, Inc. has been unresponsive historically to Carolina West's inquiries for product information. Although recent contacts have yielded intermittent communications, Carolina West has been unable to finalize contract negotiations with True Positions, Inc. For these reasons Carolina West will plan for a CDMA system utilizing a handset-based solution for Phase II E911. To that end Carolina West has consulted with some of the major handset manufacturers for CDMA, and has determined that a handset approach will be more efficient. Carolina West continues to receive and is in the process of evaluating available products that would enable Carolina West to deploy a handset-based technology for Phase II.

(2) Testing and Verification

Carolina West has not itself conducted tests of Phase II technology. It will review and evaluate the test results and accompanying technical information provided by potential providers of equipment, services and software. Carolina West will adopt its own testing and verification methods and procedures based on sound engineering and statistical practices, referring to the principles and standards set forth in OET Bulletin 71. This testing and verification will likely be incorporated into routine testing by company technicians once a handset-based solution has been implemented.

(3) Implementation Details and Schedule

- In a separately filed petition, Carolina West has requested and received from the Commission an extension of time to implement Phase II services, which was made available to other small and regional wireless carriers defined as "Tier III" carriers in the Commission's *Order to Stay*, 17 FCC Rcd 14841, released July 26, 2002 ("Extension Order"). It is Carolina West's intention to begin selling and activating location-capable handsets no later than September 1, 2003, and otherwise to comply with the deadlines applicable to Tier III carriers as set out in paragraph 33 of the Extension Order; and
- Carolina West will notify the FCC of any change in its schedule for implementation. Carolina West recognizes that the Commission's current rules require the deployment of a Phase II system, even if none exists which fully meets the Commission's accuracy requirements.

(4) PSAP Interface

Carolina West intends to work with each PSAP to mutually determine the best method of delivering Phase II information to that PSAP. It is Carolina West's intention to deploy the necessary hardware and software changes to timely deliver the Phase II information in accordance with any valid Phase II request. Where appropriate, Carolina West will work with PSAPs to convert the PSAP interface to non-call path associated signaling ("NCAS") to accommodate the increased messaging requirements resulting from implementation of E911 capabilities.

(5) Existing Handsets

It is anticipated that Carolina West's handset-based solution will create a Phase II capability that will provide enhanced ALI information from the commencement of implementation.

(6) Location of Non-Compatible Handsets

It is Carolina West's intention to employ a handset-based solution that will ensure that E911 calls coming from handsets that are incompatible with Carolina West's technology solution will be delivered to the PSAP with E911 Phase I information. At a minimum, non-subscribers to Carolina West's service with network-based systems roaming into Carolina West's service area will receive Phase I capabilities within the PSAP areas that are Phase I capable.

(7) Other Information

Carolina West remains dedicated to implementation of E911 Phase II ALI capabilities that comply with the Commission's accuracy requirements to the greatest degree technically possible. While Carolina West cannot control equipment availability or vendors' delivery schedules, it will work diligently to timely implement a handset-based E911 Phase II solution for its in-place CDMA network, and continue research of any available Phase II solution for any portion of a market area that remains served only with a TDMA network.

Carolina West is in receipt of separate Phase II E911 implementation requests from Wilkes County, Watauga County, Avery County and Surry County, North Carolina. Carolina West has addressed with each County a proposed deployment schedule, such that the initial deadline for compliance will be consistent with that granted to Tier III wireless carriers in the FCC's Extension Order. Carolina West has proposed meetings with the Counties to pursue the common objectives for implementation of Phase II E911.

Carolina West is in receipt of a fresh request from the Town of Boone, North Carolina for E911 services. Carolina West plans to meet with Town officials to assess the readiness of the Town to receive Phase II location data, and to discuss the Phase II deployment plan.

Finally, Carolina West received a Phase II deployment request from Ashe County, North Carolina, but the County subsequently retracted the request.