

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Revision of the Commission’s Rules) CC Docket No. 94-102
To Ensure Compatibility with Enhanced)
E911 Emergency Calling Systems)
)

To: The Commission

**Supplemental Report of Leaco Rural Telephone Cooperative, Inc.
Regarding TTY Access to Digital Wireless Systems and Request for Limited Waiver**

Leaco Rural Telephone Cooperative, Inc. (“Leaco”), by its attorneys, hereby provides this supplemental report on its implementation of text telephone (“TTY”) access to digital wireless systems in connection with its TTY implementation report filed on April 11, 2003 pursuant to the Federal Communications Commission’s (“FCC” or “Commission”) *Waiver Grant Order* in the above-captioned proceeding.¹

In its last report, filed on April 11, 2003, Leaco reported that ten out of Leaco’s twelve cellular cell sites had the hardware necessary to operate with newly-installed digital TTY-compatible Lucent software. As Leaco noted in the report, Leaco was unable to turn on the new software for its entire network until the remaining two sites were fitted with the correct Lucent hardware, since turning on the new software prior to the upgrade of the two sites would have knocked the two sites off the network, causing dropped customer calls and a marked deterioration in Leaco’s mobile service. Leaco

¹ *In re Revision of the Commission’s Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, Order, CC Docket No. 94-102, DA 02-1540 (June 28, 2002) (“*Waiver Grant Order*”).

reported that it expected to install newly purchased hardware by April 24, 2003 and have its communications links converted by May 24, 2003.

Since its last report, Leaco has upgraded one of the two non-compatible cellular cell sites, and all but one of Leaco's cellular sites are now capable of handling digital TTY calls, based on Leaco's drive testing. In addition, Leaco's PCS service, which has 8 cell sites, is fully digital TTY-capable and is up and running.

With respect to the one remaining cellular site that is unable to handle digital TTY calls, the hardware that Leaco installed at the end of April did not contain all the equipment necessary to make the tower digital TTY compatible, so Leaco was forced to re-inventory and order more parts, and reschedule the conversion of its TTY communication links. These necessary parts arrived the week of June 9, 2003 and Leaco began drive tests on the one remaining cellular cell site on June 18, 2003. Based on its previous experiences with installing and testing the necessary parts, Leaco is optimistic that the hardware phase of its digital TTY implementation is finished. All that remains for Leaco's digital TTY implementation is the conversion of Leaco's communication links by its third-party SS7 data links and database provider, TSI. TSI has scheduled this "conversion" for July 21, 2003. Once TSI has converted Leaco's cellular network, Leaco will perform the final tests of its "on air" digital TTY solution and expects to be digital TTY compatible by the end of July.

Accordingly, for the reasons set forth in its December 11, 2002 waiver request, as supplemented by the facts set forth herein and in its April 11, 2003 report, Leaco requests a limited extension of waiver of the Commission's digital TTY rules until July 31, 2003.

Respectfully submitted,

**LEACO RURAL TELEPHONE
COOPERATIVE, INC.**

By: _____/s/_____
Michael R. Bennet
Bennet & Bennet, PLLC
1000 Vermont Avenue, NW
Tenth Floor
Washington, DC 20005
202-371-1500

Its Attorneys

Dated: June 26, 2003

Declaration of John Smith

I, John Smith, do hereby declare under penalty of perjury the following:

1. I am the General Manager of Leaco Rural Telephone Cooperative, Inc.
2. I have read the foregoing “Supplemental Report Regarding TTY Access to Digital Wireless Systems and Request for Limited Waiver.” I have personal knowledge of the facts set forth therein, and believe them to be true and correct.

/s/
John Smith

6/26/03
Date