

**3 RIVERS PCS, INC. d/b/a
3 RIVERS WIRELESS
P.O. BOX 3387
GREAT FALLS, MONTANA 59403-3387**

Marlene Dortch, Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

**Re: CC Docket No. 94-102
Broadband PCS Station WPOI209
Tenth Quarterly Report**

Dear Ms. Dortch:

This report is filed pursuant to the Commission's *Fourth Report and Order*, in CC Docket No. 94-102, released December 14, 2000.

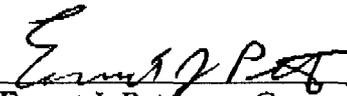
3 Rivers PCS, Inc. d/b/a 3 Rivers Wireless (3 Rivers) is the licensee of station WPOI209 in the Broadband Personal Communications Service (PCS). Station WPOI209 is a license partitioned from the 30 MHz Block A license granted to GTE Macro Communications Corporation (GTE), on June 23, 1995, for the Spokane-Billings Major Trading Area (MTA). On April 17, 1997, the Commission approved the application to partition to 3 Rivers a portion of GTE's license for the Spokane-Billings MTA, to include the Great Falls, Billings, Bozeman, Helena and Butte (except for Powell County) Basic Trading Areas. 3 Rivers utilizes Nortel Networks' CDMA equipment for its PCS network.

We are continuing to follow the progress of the Wireless TTY Forum and are continuing to work with our switch supplier, Nortel Networks, and our handset vendors toward effecting compliance with the Commission's requirements for providing TTY

access to E-911 calling systems over our PCS facilities. The attachment hereto details the progress we have made as of June 30, 2003.

Respectfully submitted,

**3 RIVERS PCS, INC. d/b/a
3 RIVERS WIRELESS**

By: 
Ernest J. Peterson, General Manager

Dated: July 14, 2003

Of Counsel:

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**3 Rivers PCS, Inc. d/b/a 3 Rivers Wireless
E911 TTY Device Capability Report as of June 30, 2003**

Network and Infrastructure Development – 3 Rivers has completed the necessary update to its building that houses the new switch that we have been required to install by Nortel Networks for our wireless network. We are currently in the process of installing the switch hardware. Refer to our Ninth Quarterly Report, filed April 15, 2003, for our projected schedule at the time. We are still uncertain whether the target September 15, 2003 in-service date will be met. At this time, we are having weekly status calls with the Nortel project team and working through the issues with conversion, translations, and general time lines. The wireline side of the dual-platform switch will be migrated first to the new wireline switch that we are installing. Once that is complete and tested we will then be allowed to migrate the wireless side to the new MTX 10.x load which will allow us to become TTY compliant.

Handset Development and Testing Plans – 3 Rivers is still continuing to carry the handsets that are listed in our Ninth Quarterly Report. In addition to the handsets previously listed, we have obtained several test models of the Motorola 120e. This handset is the only one listed by Harris Communications as being compatible with its digital TTY terminal. We have only a few of these units and are waiting to become compliant in order to test with them. We are in the process of possibly looking at obtaining a unit from Harris Communications in order to facilitate any testing needs we may have.

Beta and Lab Testing – Our plan to test with the Montana School for the Deaf and Blind is still on our roadmap to compliance. In order to bring this about, we have placed several handsets with students at this school. These students will have general knowledge of the functions of the handsets once we are compliant and ready to do our testing.

Release and General Availability to Carriers of Network Infrastructure Software – The necessary software is currently available for release. 3 Rivers will have to continue to work through the process of installing its new switch in order to become compatible with the newer Nortel software releases. See projected scheduling in our *Ninth Quarterly Report* and explanation in *Network and Infrastructure Development*.

Availability to Carriers of Full Digital Acceptance Test Units – It has been difficult at times to obtain the necessary test units as they are introduced to the market. As a small rural carrier, we are not at the top of the distribution list to obtain these units. The last handset that we have been able to receive was the Motorola 120e, which has been on the market for a period of time. A foreseeable struggle in the future will be obtaining the latest handsets in a timely manner.

Efforts Toward Achieving Digital Wireless Solution Compatibility w/ Enhanced TTY – 3 Rivers is still pursuing all efforts in order to achieve a full digital solution. With the efforts we have taken with MTAP (Montana Telecommunication Access Protocol) and the strides we have made with getting handsets into the hands of several students at the Montana School for the Deaf and Blind, we believe that we are headed down the right path to make this a success. We are

working to expedite the schedule of our infrastructure/switching reconfiguration to become compliant.

Carrier Coordination with the PSAP – 3 Rivers will coordinate with each individual PSAP in its service area once the service has been deployed. All coordination with each PSAP will be done on a case-by-case basis.

Carrier Testing Activities, Including Field Testing, Consumer End-To-End Testing, and Other Necessary Tests – Testing will commence once equipment, software, deployment, installation, and turn-up are completed. We are working to put an official test plan into place hopefully by the end of the year. Our focus at this time is to become compliant. After our switch upgrade is completed, we will be in a better position to come up with firm dates for testing.

Retail Availability of Necessary Consumer Equipment – Along with the handsets listed in our Ninth Quarterly Report, we have obtained a new handset model that is the only handset to interface with the Harris Communications TTY station. This is the station that is used by the students of the Montana School for the Deaf and Blind. We are continuing to work with handset manufacturers and TTY interface manufacturers toward a final solution.

Geographic Scope of Network Infrastructure Deployment – Our switch once split will be a standalone MTX. We have one switch for the state of Montana; therefore deployment will be system wide. *See Network and Infrastructure Development.*