

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

Attn: John B. Muleta, Chief, Wireless Telecommunications Bureau
David H. Solomon, Chief, Enforcement Bureau

Re: CC Docket No. 94-102
Broadband PCS Stations KNLG704 and KNLG705
BTA 113 (Dickinson, North Dakota)
E911 Interim Report

Dear Ms. Dortch:

This report is filed pursuant to the Commission's *Non-Nationwide Carrier Order (Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay, rel. July 26, 2002) and the Commission's *Public Notice*, released June 30, 2003, DA 03-2113..

Consolidated Telcom is the licensee of stations KNLG704 and KNLG705 in the Broadband Personal Communications Service (PCS), acquired in Auction No. 11. These stations operate on the F- and D-blocks, respectively (10 MHz each). The licensed service area covers the Dickinson, North Dakota Basic Trading Area (BTA 113), a rural area in southwestern North Dakota. Consolidated utilizes GSM equipment manufactured by InterWAVE Communications, Inc. of Menlo Park, California (InterWAVE). Our PCS facilities have been operational since April 2002.

I. The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid):

We are currently providing PCS service in Stark County, North Dakota. To date, Stark County Emergency Management, the PSAP in Stark County, has not requested either Phase I or Phase II, E911 service.

II. The carrier's specific technology choice (i.e., network-based or handset-based solution, as well as the type of technology used):

As indicated above, our GSM equipment is supplied by InterWAVE of Menlo Park, California. In achieving compliance with the Phase II requirements, we have elected to utilize the handset-based technology manufactured by Motorola. We are in regular contact with InterWAVE and Motorola to keep updated on their software and hardware compatibility development for our system. Operational studies have been ongoing between these two suppliers to assure Phase II functionality with our system and we are currently awaiting their completion. While we have initially selected Motorola as our handset solution, we are willing to implement other solutions that might work with our system.

III. Status on ordering and/or installing necessary network equipment:

Once the operational studies mentioned in Item II are completed, we will be able to order and incorporate ALI-capable handsets in our system. We are hoping to be able to order compatible handsets available from Motorola in mid-2004. We will also need appropriate software upgrades in our InterWAVE switch by then in order to be able to provide Phase II service.

IV. If the carrier is pursuing a handset-based solution, the Report must also include information on whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets:

We have thus far been unable to obtain ALI-capable handsets because, to our knowledge, there are no handsets currently available that are compatible with our InterWAVE equipment. Accordingly, we will not be able to meet the current September 1, 2003 deadline to begin selling and activating ALI-compliant handsets. As a small rural carrier, we do not receive the preferential treatment or customer service that the large carriers enjoy. With issues such as new technology and product development, we have a very small voice and are generally forced to use what has been decided by the larger carriers. This places us in the unenviable position of having to take what the handset vendors will let us have, and with little in the way of negotiating power. Insofar as marketing ALI-capable handsets to our customers, we anticipate that at least some of our customer base will be skeptical about purchasing a handset that will allow us and the local PSAP to locate them at any time. They value a certain sense of privacy and do not wish to expose their lives and private information to be monitored by someone they don't know. Perhaps a more palatable approach would be a user-defeatable switch to allow the customer to turn the ALI function on and off at will. But, then this would create other problems that would need to be reviewed when the ultimate decision is made.

V. The estimated date on which Phase II service will first be available in the carrier's network:

The PSAP in Stark County currently lacks the equipment and funding necessary to implement Phase II service. As indicated above, we are presently unable to procure the necessary technology and software from our vendors to operate such a system. We will continue to stay in close touch with our vendors to monitor their progress and the release dates for these upgrades. We are also in close communication with Stark County Emergency Management regarding their readiness. Our best estimate on when Phase II service will first be available on our system is mid-2004.

VI. Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005:

Due to the continuing FCC mandates for our PCS system, we seriously question whether we will have the financial resources to keep our system in operation and compliant with these mandates. Our customer base is very small and we do not feel that the revenue generated by these operations can now or in the future provide for all the equipment and operational requirements. We are currently looking into other avenues of revenue and operational uses for our system, which may prove to add value; but, at this point, we believe that PCS is not a viable operation in rural America because of the technology costs and limitations.

As of now, we are not on schedule to meet the ultimate Phase II implementation deadline of December 31, 2005. To summarize, the obstacles we have encountered in achieving compliance are:

- Acquiring the necessary funds to complete the necessary system upgrade;
- Justifying the upgrade based on our very small customer base;
- Having our switch and handset vendors complete their necessary testing and proof of performance with the new equipment and software and then release it to us in time to meet the deadlines.

We will continue to do long range planning and attempt to formulate a budget to account for these expenses. We will also continue to remain in close communication with all the involved parties, suppliers and PSAP, to determine their progress in completing their piece of the puzzle. We have also begun discussions to further utilize our PCS system to provide more value from its operation.

At present, we believe that compliance with the December 31, 2005 deadline is possible but we fear that vendor-specific issues may arise that will delay ultimate compliance for six months to a year. We will, of course, do everything within our power to facilitate this process; but the reality is that we are still relying heavily on our switch and handset vendors for achieving compliance and we are largely at their mercy in this regard.

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The undersigned hereby declares under penalty of perjury under the laws of the United States that the statements of fact in the foregoing report are true and correct to the best of his knowledge, information and belief.

Dated this 27th day of July, 2003.

Respectfully submitted,

Consolidated Telcom

By:



Paul Schuetzler
General Manager/CEO

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