

**AIRWAVE WIRELESS, LLC**  
**P.O. Box 48**  
**12 East First Street**  
**Kimball, SD 57355**

*Via ECFS Electronic Filing*

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

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

**Re: Airwave Wireless, L.L.C.**  
**CC Docket No. 94-102**

Dear Ms. Dortch:

Airwave Wireless, L.L.C ("Airwave") is the licensee of Broadband PCS Stations WPOJ826 (Market B199 - Huron, SD BTA C-Block) and WPOJ827 (Market B301 - Mitchell, SD BTA C-Block). The five-year buildout deadline for both of these licenses does not fall until June 30, 2004.

It is our understanding that certain Tier III CMRS carriers have been directed to file an Interim Report with the FCC on or before August 1, 2003, describing in detail their implementation plans for Wireless E911 Phase II Automatic Location Information.<sup>1</sup> In lieu of filing an E-911 Interim Report, and to answer any questions that the Commission's staff may have regarding Airwave's regulatory compliance, we provide the following information:

Airwave has not yet chosen the technology that it will ultimately use to satisfy its buildout requirement, and therefore has not chosen an E-911 Phase II technology. As described in various TTY Quarterly Report filings with the Commission, Airwave is participating in an operational trial of UTStarcom's Personal Access System (PAS) digital wireless technology in the Mitchell BTA.<sup>2</sup> As of this time, operations on Airwave's broadband PCS network are limited to the provision of fixed voice and data services only. Airwave has not received any PSAP requests for E-911 Phase I or Phase II service.

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<sup>1</sup> See 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) ("*Non-Nationwide Carrier E911 Order*") at paras. 34-35.

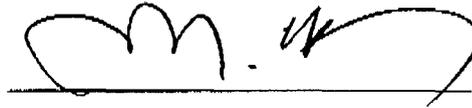
<sup>2</sup> See, e.g. Quarterly TTY Report of Airwave Wireless, LLC, CC Docket 94-102 (filed October 12, 2001).

The PAS System has been designed to complement the existing PSTN services and network infrastructure. In fixed wireless deployments, the UTStarcom Fixed Access Unit may be installed up to 3 miles from the radio port (cell). However, a directional antenna must be permanently installed at the subscriber's premises. Because this equipment is installed at a fixed location, a caller's physical location can be determined in the same manner as this is done in a wired telephone network. In other words, the street address of a subscriber terminal can be programmed into the PSAP ALI database and associated with the caller's telephone number. The PSAP can then retrieve an emergency caller's address using the caller's ANI and the same systems that are used for determining the location of a wireline call. The UTStarcom technology can support a limited "walk around" wireless phone capability. However, Airwave is not currently offering such service.

Should Airwave decide in the future to provide a wireless mobility service that falls within the scope of Rule Section 20.18, we will comply with applicable regulatory obligations with respect to E-911.

Respectfully submitted,  
Airwave Wireless, L.L.C.

By



Dated: July 27, 2003

cc: via e-mail to [E911compliancereports@fcc.gov](mailto:E911compliancereports@fcc.gov)

Please refer all inquiries and correspondence to:

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