

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Revision of the Commission's Rules To)	CC Docket No. 94-102
Ensure Compatibility with Enhanced 911)	
Emergency Calling Systems)	
)	
Phase II Compliance Deadlines for Non-)	
Nationwide CMRS Carriers)	
)	

To: The Commission

INTERIM REPORT REGARDING E911 PHASE II DEPLOYMENT
ADVANTAGE CELLULAR SYSTEMS, INC.

Advantage Cellular Systems, Inc. (Advantage) hereby submits this Interim Report on E911 Phase II deployment as required by the Commission's *Non-Nationwide Carrier Order*.¹ Advantage is a Tier III wireless carrier that had previously sought additional time to comply with the Commission's E911 Phase II rules and is subject to the limited relief afforded to certain Tier III carriers by the *Non-Nationwide Carrier Order*. The following report is intended to provide the information outlined by the Commission in its June 30, 2003 public notice providing guidance on Interim Report filings by small sized carriers (DA-03-2113).

1. Phase I and Phase II Requests

Advantage currently provides wireless service to eight counties. Advantage has received both Phase I and Phase II requests from six of those counties. There have been no insurmountable problems encountered in meeting these requests. Advantage has not received any Phase I or Phase II PSAP requests in 2 of the counties in which it provides service (Van Buren and Grundy). There is currently no PSAP designated in those counties.

¹ *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket 94-102, Order to Stay, FCC 02-210 (rel. July 26, 2002) (*Non-Nationwide Carrier Order*).

2. Specific Technology Choice

Advantage has chosen to meet its Phase II E911 requirements by employing a network-based solution that utilizes Grayson Wireless equipment. The only problems Advantage has experienced in cutting its system over to Phase II related to difficulties experienced by Advantage's vendors, Intrado and TCS, in integrating software and programming the switch responsible for routing E911 calls to the appropriate PSAP. Software integration took somewhat longer than originally anticipated but was successfully accomplished.

3. Ordering/Installation Status

All equipment necessary to implement E911 has been ordered and deployed in six of eight counties. No installation problems were encountered. Equipment for the remaining two counties, Van Buren and Grundy, will be ordered and deployed following the establishment of a PSAP in those areas and receipt of an E911 request.

4. Handset Availability

Advantage is not pursuing a handset-based solution.

5. Estimated Phase II Service Date

Phase II deployment began in September, 2002. Five of the eight counties served by Advantage were cut over to Phase II service in January, 2003. A sixth county was cutover to Phase II service in May, 2003. Phase II service in the remaining two counties awaits the establishment of appropriate PSAPs in those areas.

6. Ultimate Compliance

Advantage is on schedule to meet all E911 deployment deadlines subject to the establishment of appropriate PSAPs in Van Buren and Grundy counties that currently do not have any type of 911 capabilities at this time.

