

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
OTZ TELECOMMUNICATIONS, INC.

OTZ Telecommunications, Inc. ("OTZ") hereby submits this Interim Report on E911 Phase II deployment as required by the Commission's *Non-Nationwide Carrier Order*.¹ OTZ 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

OTZ has not received any Phase I or Phase II PSAP requests.

2. Specific Technology Choice

OTZ currently operates an analog TDMA system and intends to meet its Phase II E911 service requirements using a handset-based solution. OTZ has not begun implementation due to the fact that there are no equipment vendors that are manufacturing TDMA ALI-capable handsets. OTZ has remained in continuous contact with equipment vendors, but has been unable to find a single vendor that plans to manufacture TDMA handsets with ALI capability. Given that all the national carriers have deployed or are migrating to CDMA or GSM technologies, it is highly unlikely that

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*).

vendors will expend their resources to develop and manufacture ALI capable handsets for TDMA networks, since they have not done so already.

3. Ordering/Installation Status

No equipment has been ordered for the reasons set forth in item 2, above.

4. Handset Availability

As indicated in response to item 2, above, there are no equipment vendors that are manufacturing TDMA ALI-capable handsets or that are likely to do so in the future. Small companies such as OTZ have little or no influence over the manufacturing decisions of equipment vendors. When OTZ converts its analog network to a GSM-based or CDMA-based ALI-capable digital network (See Section 5 *infra*), OTZ anticipates that it should be able to successfully market ALI-capable handsets once they become readily available. Since ALI-capable GSM handset technology is still being developed (*e.g.*, QUALCOMM expects to release its GSM-based ALI handset technology in September 2004), it is too early to predict just how successful OTZ's marketing efforts will prove to be.

5. Estimated Phase II Service Date

In order to implement Phase II capability, OTZ is planning to transition its system from an analog-based TDMA system to a digital GSM-based or CDMA-based system. OTZ serves the small city of Kotzebue located 550 miles northwest of Anchorage. Although incorporated as a city, Kotzebue is essentially a village, boasting of a population of about 3,500 residents. Due to the extreme weather and other geographic factors, OTZ's costs to run a wireless network are considerably higher than most continental U.S. networks. As a result, OTZ's migration to digital technology is a complex business and technological decision that must take into account OTZ's roaming partners' choice of technology and OTZ's remote network. OTZ must also carefully budget its yearly wireless expenditures since it does not have a large customer base for speedy cost recovery. OTZ intends to pursue conversion of its wireless network to digital capability and to begin selling and activating ALI-capable handsets by September 1, 2005.

6. December 31, 2005 Deadline

Taking into account OTZ's timetable for ultimately replacing its TDMA technology with GSM or CDMA technology, it is possible that OTZ might not meet the Commission's December 31, 2005 deadline for achieving a 95 percent penetration rate for ALI-capable handsets.

DECLARATION OF DOUG NEAL

I, Doug Neal, do hereby declare under penalty of perjury the following:

1. I am the General Manager of OTZ Telecommunications, Inc.
2. I have read the foregoing "Interim Report Regarding E911 Phase II Deployment." I have personal knowledge of the facts set forth therein, and believe them to be true and correct.

_____/s/_____
Doug Neal

_____/7/31/03_____
Date