

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of )  
 )  
Revision of the Commission's Rules ) CC Docket No. 94-102  
To 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**

**SPECTRACOM, INC. D/B/A PYXIS COMMUNICATIONS**

SpectraCom, Inc. d/b/a PYXIS Communications ("PYXIS") hereby submits this Interim Report on E911 Phase II deployment as required by the Commission's *Non-Nationwide Carrier Order*.<sup>1</sup> PYXIS 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**

PYXIS has received two requests from PSAPs for Phase I E911 service. PYXIS has not received any requests for Phase II E911 service. Regarding the Phase I requests, PYXIS received a request from 1) the Albany County PSAP and 2) the Natrona County PSAP. Although PYXIS encountered trunking delays with Qwest in Albany County, it is now providing Phase I service to the Albany PSAP. PYXIS does not consider the Natrona PSAP request to be a valid request since the Natrona PSAP is technically incapable of handling Phase I data. Further, Natrona County and Qwest are still negotiating rates in order to set up the county's Phase I system. Qwest will not handle any of PYXIS' Phase I data in Natrona County until it works out the finances with the county. At this point, Phase I service in Natrona County is on hold as the PSAP works out both the economics of providing such service and gets its Phase I network up and

---

<sup>1</sup> *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*).

running. The PSAP has informed PYXIS that it simply does not have the budget at this time to process Phase I data. PYXIS anticipates that it will be able to provide Phase I service in Natrona County within six months after the PSAP makes a valid request. PYXIS remains in close contact with the Natrona County PSAP in order to remain abreast of the PSAP's Phase I implementation schedule.

**2. Specific Technology Choice**

PYXIS has chosen a handset-based ALI solution to achieve Phase II compliance. PYXIS is in the midst of transitioning its network from a CDMA network to a GSM-based network that will be ALI-capable. PYXIS expects to sell its wireless network to Union Telephone Company ("Union") before year's end.

**3. Ordering/Installation Status**

PYXIS' switch is a Nortel DMS 100W wireline/wireless hybrid currently utilizing software load MTX09 for wireless operations. Nortel no longer supports such wireline/wireless hybrid switches with software upgrades. In order to meet the FCC's Phase II mandates, the switch must therefore be split and the wireless switch must be upgraded. PYXIS has encountered numerous delays from Nortel regarding the complex task of splitting and upgrading PYXIS' switch. In anticipation of the sale of PYXIS' wireless assets, Union has already purchased and installed a new GSM switch and is beginning to overbuild the CDMA network in order to achieve Phase II compliance.

**4. Handset Availability**

PYXIS has ordered and obtained Kyocera CDMA-based ALI-capable handsets even as the network is actively being converted to GSM. PYXIS has not ordered any GSM-based ALI-capable handsets 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) and the PYXIS network is only beginning to be converted to GSM. Based upon its experience with the ALI-capable Kyocera model, PYXIS does not anticipate any problems marketing similar ALI-capable handsets.

**5. Estimated Phase II Service Date**

PYXIS has begun selling and activating ALI-capable handsets. However, the PYXIS network will not be Phase II capable until soon after the sale of its wireless network is finalized.

**6. December 31, 2005 Deadline**

Based upon Union's progress in purchasing a GSM switch and converting the PYXIS network in anticipation of the pending finalization of the sale, PYXIS expects that whoever owns the network will be capable of meeting the Commission's December 31,

2005 deadline for achieving a 95 percent penetration rate for ALI-capable handsets. However, the ultimate responsibility for Phase II compliance will soon depend upon the actions of Union.

**DECLARATION OF MARY REBECCA DOOLEY**

I, Mary Rebecca Dooley, do hereby declare under penalty of perjury the following:

1. I am the General Manager of SpectraCom, Inc. d/b/a PYXIS Communications.
2. I have read the foregoing "Interim Report Regarding E911 Phase II Deployment." I have personal knowledge of the facts set forth herein, and believe them to be true and correct.

\_\_\_\_\_/s/\_\_\_\_\_  
Mary Rebecca Dooley

\_\_\_\_\_/7/31/03\_\_\_\_\_  
Date