

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
WIRELESS COMMUNICATIONS VENTURE

Wireless Communications Venture ("WCV") hereby submits this Interim Report on E911 Phase II deployment as required by the Commission's *Non-Nationwide Carrier Order*.¹ WCV 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

The State of Minnesota sent a blanket PSAP request for Phase I service in February 2001. Although the request also contained language requesting Phase II service, the Phase II component of the request was invalid because the PSAPs in WCV's service area were incapable of handling Phase II data.

In implementing Phase I, WCV experienced unanticipated delays based on the inability of its vendor, TCS, to timely deliver the database updates that are needed for system testing. WCV has recently received limited updates that have allowed it to successfully test a portion of its network. WCV envisions being completely Phase I capable by the end of August 2003, assuming that TCS is able to provide the remainder of the database updates in a timely fashion.

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

WCV currently operates a TDMA system, having converted from a CDMA system, and intends to meet its Phase II E911 requirements utilizing a handset-based solution. WCV has not begun implementation due to the fact that there are no equipment vendors that are manufacturing TDMA ALI-capable handsets. WCV has been unable to find a single vendor that plans to manufacture TDMA handsets with ALI capability. One solution to this problem would be for vendors to manufacture TDMA ALI-capable handsets. However, given the fact that national carriers have deployed or are migrating to CDMA or GSM technologies, it now appears unlikely that vendors will deploy their resources to develop and manufacture TDMA-based ALI capable handsets. Accordingly, WCV determined that it had to upgrade its network to an ALI-compatible technology. WCV is presently exploring options for accomplishing this network overlay using CDMA or similar technology, which would allow it to ultimately become ALI-capable.

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 WCV have little or no influence over the manufacturing decisions of equipment vendors.

5. Estimated Phase II Service Date

In order implement Phase II capability, WCV will have to transition its system from TDMA to an alternate technology. WCV is currently looking into migrating its system to CDMA or a similar technology that will allow it to meet Phase II requirements using a handset-based solution. It is difficult to project Phase II availability at this time as WCV is still examining how best to implement its technology overlay. However, based upon its research into CDMA-based solutions, WCV projects that Phase II capability would first be available on portions of its network by year end 2004.

6. December 31, 2005 Deadline

Taking into account WCV's plans to begin replacing its TDMA technology with an ALI-capable technology and the resistance of some customers to replacing their older handsets, it is possible that WCV might not meet the Commission's December 31, 2005 deadline for achieving a 95 percent penetration rate for ALI-capable handsets.

