



# WHIDBEY TELEPHONE COMPANY

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August 1, 2003

*Via ECFS Electronic Filing*

Marlene H. Dortch, Secretary  
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: CC Docket No. 94-102**  
**Broadband PCS Stations KNLG248 and KNLG517**  
**E911 Interim Report**

Dear Ms. Dortch:

Whidbey Telephone Company ("Whidbey") is a Tier III wireless carrier and the licensee of Stations KNLG248 (BTA002-F, Aberdeen, WA) and KNLG517 (BTA356-D, Port Angeles, WA) in the Broadband Personal Communications Service ("PCS"). In accordance with the *Non-Nationwide Carrier E911 Order* in Docket No. 94-102<sup>1</sup> and the Commission's related Public Notice, DA 03-2113 (*rel.* June 30, 2003), Whidbey hereby submits its report on the status of implementation plans for Wireless Enhanced 911 ("E911") Phase I and Phase II Automatic Location Information on Whidbey's PCS network, as follows:

**I. The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid):**

To date, Whidbey has not received any PSAP requests for PCS E911 Phase I or Phase II service.

**II. The carrier's specific technology choice (i.e., network-based or handset-based solution, as well as the type of technology used):**

Upon receiving a valid PSAP request for PCS E911 Phase II service, Whidbey plans to utilize a network-based "time difference of arrival" ("TDOA") solution from Grayson Wireless to meet its PCS E911 Phase II service obligations.

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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.

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**III. Status on ordering and/or installing necessary network equipment:**

As noted in previous filings with this Commission, switching and certain other functions in Whidbey's PCS operations are being provided by AT&T Wireless Services, Inc. and/or one or more of its affiliates ("AWS").<sup>2</sup> Accordingly, Whidbey's PCS network will utilize E911 ALI equipment and trunking services provided by AWS. Whidbey has been advised by AWS that the equipment necessary to provide E911 Phase I and Phase II capability for Whidbey's PCS network in the Port Angeles BTA has already been deployed, and that the equipment necessary to provide Phase I capability for Whidbey's PCS network in the Aberdeen BTA will be deployed before the end of the year 2003.

**IV. If the carrier is pursuing a handset-based solution, the Report must also include information on whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets:**

Not applicable.

**V. The estimated date on which Phase II service will first be available in the carrier's network:**

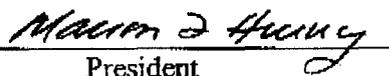
The date on which Phase II service will first be available in Whidbey's PCS's network will depend upon the date Whidbey receives a valid PSAP request for such service. As noted above, Whidbey has been advised by AWS that Whidbey's PCS network is already capable of providing E911 Phase II service in the Port Angeles BTA.

**VI. Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005:**

Assuming that the PSAPs in its operating territory are ready and that Whidbey is still operating its present PCS system at that time, Whidbey does not anticipate any problems in meeting the PCS E911 Phase II implementation date of December 31, 2005.

Respectfully submitted,  
Whidbey Telephone Company

By

  
President

Dated: August 1, 2003

<sup>2</sup> See, e.g., Quarterly TTY Implementation Report of Whidbey Telephone Company, CC Docket No. 94-102 (filed October 15, 2002).

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#### Declaration

I, Marion F. Henny, hereby state the following under penalty of perjury: I am President of Whidbey Telephone Company. I have read the foregoing E911 Interim Report and to the best of my knowledge, information and belief, all of the information contained in the report is truthful and accurate.

Dated this 1<sup>st</sup> day of August, 2003

Marion F. Henny