

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

NSP LC

NSP LC ("RSA 11") hereby submits this Interim Report on E911 Phase II deployment. On January 8, 2003, RSA 11 informed the Commission that it had decided to change from a network-based Phase II solution to a handset-based solution for its CDMA-based network. RSA 11's technology change subjected it to the Commission's handset-based Phase II benchmarks and RSA followed up its technology change report to the Commission with a request for waiver on January 23, 2003, seeking relief consistent with that granted to Tier III carriers in the Commission's *Non-Nationwide Carrier Order*.¹ 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

RSA 11 has received five Phase I requests from the State of Iowa Emergency Management on behalf of PSAPs. RSA 11 is providing Phase I service to those five PSAPs. Based on its experience in implementing Phase I, RSA 11 notes that the PSAP database requires a high degree of detail in order to validate an emergency call's accuracy. RSA 11 has not received any requests for Phase II service.

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

RSA 11 has chosen a handset-based solution.

3. Ordering/Installation Status

RSA 11 has ordered and received ALI-capable handsets and has tested a number on its network. RSA 11 has not ordered PDE as of yet since it has had no request for Phase II service.

4. Handset Availability

CDMA ALI-capable handsets are generally available and RSA 11 has obtained a limited quantity of these handsets. RSA 11 has agreements in place to obtain more such handsets. While RSA 11 does not anticipate any problems marketing and selling ALI-capable handsets, RSA 11 cannot predict customer willingness to upgrade handsets.

5. Estimated Phase II Service Date

RSA 11 expects that it can become fully capable of handling Phase II E911 data within six months of a valid PSAP request. However, RSA cannot be certain of the accuracy of the GPS-assisted handsets in all regions that it serves due to the remote, rural nature and dispersed cell sites in its service area.

6. December 31, 2005 Deadline

RSA 11 expects to be capable of meeting the Commission's December 31, 2005 deadline for achieving a 95 percent penetration rate for ALI-capable handsets.

