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August 1, 2003

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Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**RE: E911 Interim Report  
Airtel Wireless, LLC**

Dear Ms. Dortch:

Airtel Wireless, LLC (“Airtel” or “Company”), by its attorneys, provides the following Interim Report on the status of the Company’s compliance with the Federal Communications Commission (“FCC” or “Commission”) rules regarding wireless Enhanced 911. Airtel is a Tier III carrier and is submitting the following information in compliance with the Order to Stay adopted on July 26, 2002<sup>1</sup> and the June 30, 2003 Public Notice providing guidance regarding the substance of and filing procedures for the Interim Report.<sup>2</sup> Airtel requested and was granted an extension to comply with its E911 requirements.<sup>3</sup> However, as described *infra*, the Company hereby notifies the FCC that it has achieved E911 compliance by meeting the requirements of FCC Rule Section 20.18(k).

## I. BACKGROUND

Airtel first notified the FCC on September 26, 2001 that it was in the process of deploying a Motorola Harmony system in the Billings, MT market.<sup>4</sup> It explained that Harmony is a micro-digital derivative of the iDEN technology used by Nextel Communications, Inc. and Southern LINC. At that time, based on the information then available to the Company from Motorola and what it had been able to glean from Nextel’s public pronouncements on its E911

<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) (“Stay Order”).

<sup>2</sup> *Wireless Telecommunications Bureau Provides Further Guidance on Interim Report Filings by Small Sized Carriers*, Public Notice, DA 03-2113 (rel. June 30, 2003) (“Public Notice”).

<sup>3</sup> See Stay Order, Appendix A.

<sup>4</sup> Airtel has deployed Harmony systems in Billings, MT; Great Falls, MT; and Missoula, MT.

compliance efforts, Airtel advised the FCC that it expected to use an assisted global positioning system ("A-GPS") to meet its E911 obligations. It requested and was granted an extension to implement this solution that was similar to extensions granted to numerous other Tier III carriers.

Subsequently, in a June 27, 2002 joint letter filing with Nevada Wireless, LLC, the only other commercial operator in the country that uses Harmony technology, and again in a letter dated July 15, 2003, both of which reported on the Company's TTY efforts, Airtel described in detail the unique characteristics of the Harmony system. The June 2002 letter explained that Harmony is primarily a dispatch-oriented product with ancillary interconnection capability. At that time and even now, the system will support only up to sixteen primary transmitter sites and approximately five thousand subscribers units at full capacity. Airtel further explained that the technology was developed for the purpose of serving the communications needs of private, internal users, not commercial operators such as Airtel. As such, it was designed for users with a primary requirement for dispatch service, in particular multi-user fleets with group talk requirements, and only ancillary interconnect capabilities.

The July 2003 filing further clarified the operational characteristics of the Harmony system. Airtel explained that the system has significant limitations not only in the number of sites that can be deployed and the number of subscriber units that can be accommodated, but in the number of interconnect lines available at any one time. The latter limitation was described in greater detail in an October 31, 2002 letter from Nevada Wireless to the FCC. Nevada Wireless noted that the Harmony system relies on what is identified as a Multi-frequency (MF) or Primary Rate Interface (PRI), rather than SS7 signaling, for its interface with the telephone network, an interface commonly associated with private internal rather than commercial systems. Each telco T1 span can handle twenty-four (24) lines and the Harmony switch can accommodate only four (4) telco or voice mail spans. Typically, one (1) span is used for voice mail leaving only seventy-two (72) interconnect lines available on a Harmony network at any time. This network design deliberately favors dispatch over interconnect transmissions; interconnect capability is capped even if dispatch capacity is available at a particular moment. The great majority of capacity is reserved for dispatch service because that is deemed the priority function for the users on a Harmony system. This fundamental system design dictates the type of user that will select this particular system to serve its communications needs.

Based on the inherent limitations of the Harmony system, and the concomitant limitation on the types of users whose needs are best served on the network, Airtel has determined to satisfy its E911 obligations by meeting the alternative requirements of FCC Rule Section 20.18(k) which states as follows:

- (k) Dispatch service. A service provider covered by this section who offers dispatch service to customers may meet the requirements of this section with respect to customers who utilize dispatch service either by complying with the requirements set forth in paragraphs (b) through (e) of this section, or by routing the customer's emergency calls through a dispatcher. If the service provider chooses the latter alternative, it must make every reasonable effort

to explicitly notify its current and potential dispatch customers and their users that they are not able to directly reach a PSAP by calling 911 and that, in the event of an emergency, the dispatcher should be contacted.

All subscribers on the system have radios that are dispatch-enabled while only some have activated the interconnect function. The system is intended to and is operated and marketed by Airtel to meet the communications needs of business users, not individual consumers. Because Airtel's customer base is fully dispatch-capable, it is precisely the type of system for which this alternative approach was intended:

In adopting this definition of "covered" service, we note that some "covered" SMR providers that utilize in-network switching and provide seamless handoff may also provide their customers with dispatch capability. We agree with Geotek and Nextel that in such instances, customers' emergency needs may be as well served by the dispatcher as by providing 911 dialing access. We therefore conclude that "covered" SMR systems that offer dispatch services to customers may meet their E911 obligations to their dispatch customers either by providing customers with direct capability for E911 purposes, or alternatively, by routing dispatch customer emergency calls through a dispatcher.<sup>5</sup>

Airtel expressly advises its customers that they should contact their dispatcher in the event of an emergency and directs those who want E911 location information capability to contact the cellular and PCS operators in the area.<sup>6</sup>

## II. INTERIM REPORT

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

Airtel has received no Phase I or Phase II requests from a PSAP.

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

As described *supra*, the Company has deployed Motorola's Harmony technology. It arguably has a handset-based E911 solution since customers are instructed to contact their dispatcher in the event of an emergency.

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

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<sup>5</sup> CC Docket No. 94-101, *Memorandum Opinion and Order*, 12 FCC Rcd 22665 at ¶ 79 (1997).

<sup>6</sup> Airtel's customers are able to contact a PSAP by dialing 911, but the call does not carry any of the location information required under the alternative E911 requirements.

Marlene H. Dortch, Secretary  
August 1, 2003  
Page 4

Airtel's system is fully capable of meeting the requirements of FCC Rule Section 20.18(k) at this time.

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

See above.

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

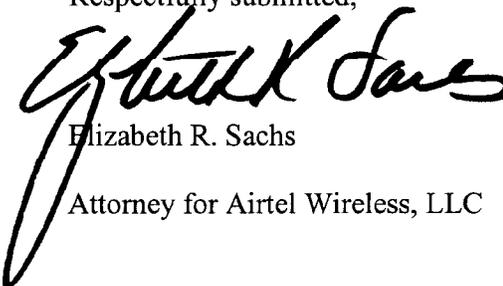
See above.

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

As described *supra*, Airtel already has met its obligations under FCC Rule Section 20.18(k).

Kindly refer any questions or correspondence regarding this matter to the undersigned.

Respectfully submitted,



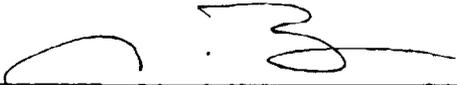
Elizabeth R. Sachs  
Attorney for Airtel Wireless, LLC

Attachment

**CERTIFICATION**

I, James W. Brock, say under penalty of perjury, that the following is true and correct:

1. That I have read the attached "E911 Interim Report";
2. That all of the information contained therein is true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
James W. Brock  
Managing Member  
Airtel Wireless, LLC

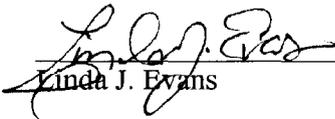
7-31-03  
\_\_\_\_\_  
Date

**CERTIFICATE OF SERVICE**

I, Linda J. Evans, a secretary in the law office of Lukas, Nace, Gutierrez & Sachs, Chartered, hereby certify that I have on this 1<sup>st</sup> day of August, 2003 caused to be delivered via courier a copy of the foregoing to the following:

John Muleta, Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W., Rm. 3-C252  
Washington, D.C. 20554

David Solomon, Chief  
Enforcement Bureau  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W., Rm. 7-C485  
Washington, D.C. 20554

  
Linda J. Evans