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SOUTHERN COMPANY

Energy to Serve Your World℠

July 31, 2003

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Southern Communications Services, Inc. d/b/a Southern LINC; Interim Report on Implementation of E911 Automatic Location Identification; CC Docket No. 94-102

Dear Ms. Dortch:

Southern Communications Services, Inc. d/b/a Southern LINC ("Southern") hereby submits the following *Interim Report on Implementation of E911 Automatic Location Identification*, as required by the Commission's July 29, 2002 *Order to Stay*.[1] Southern had less than 500,000 customers as of December 31, 2001 and is therefore classified as a "Tier III" CMRS carrier for purposes of the *Order to Stay*.

Southern, a wholly-owned subsidiary of Southern Company, operates a digitally enhanced, wide-area Specialized Mobile Radio ("SMR") system in the Southeastern United States, covering the states of Alabama and Georgia, the panhandle of Florida, and southeastern Mississippi. Southern's wide-area SMR system employs Motorola's proprietary Integrated Digital Enhanced Network Technology ("iDEN"), a digitally enhanced, time division multiple access technology.

Southern provides interconnected voice, dispatch radio, text messaging, paging, Internet service, and related services via digital handsets supported by a single switch network. While many of its customers are business users, Southern also provides service to a large number of customers with public safety responsibilities, including electric utilities, police departments, government agencies, PSAP coordinators, and ambulance services (collectively "Public Safety customers") who utilize Southern's system for wireless communications.

[1] In re Revision of the Commission's Rules to Ensure Compatibility With Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841 (2002).

Information Regarding E911 Deployment

Southern provides the following statements in response to the requests for information set forth in the Commission's July 29, 2002 *Order to Stay* and the Wireless Telecommunications Bureau's June 30, 2003 *Public Notice*.[2]

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

Phase I Requests:	As of July 31, 2003, Southern received 119 requests for Phase I service.
Phase II Requests:	As of July 31, 2003, Southern received 29 requests for Phase II service.

Also, Southern has some valid PSAP requests for Phase II service that are older than six months. However, Southern is working with its vendors toward meeting the September 1, 2003, deadline established in the *Order to Stay*.

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

Southern has chosen a handset-based solution utilizing Motorola's Assisted GPS ("A-GPS") technology.

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

Southern has ordered and installed the necessary network equipment. Since deciding to use Motorola's A-GPS technology, Southern has not encountered any significant problems in ordering or installing equipment provided by Motorola.

Southern has ordered and installed the following:

- Global Locate Server and Circuits Commissioning — Installed on or about January 28, 2003
- GMLC/SMLC Commissioning: Installed on or about February 5, 2003

[2] In re Revision of the Commission's Rules to Ensure Compatibility With Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841, 14851-52 (2002); Wireless Telecommunications Bureau Provides Further Guidance on Interim Report Filings by Small Sized Carriers, *Public Notice*, 18 FCC Rcd 12845, pp. 2-3 (2003).

- Motorola ATP Executed: Completed on or about February 6, 2003
- Diverse, Redundant Frame Relay Circuits for Connectivity into Gateway to ALI database: Installation completed by July 30, 2003
- Software Upgrades:
  - S.R. 9.6-111 Installed on or about September 20, 2002
  - S.R. 9.8 Installed on or about June 27, 2003

IV. If the carrier is pursing 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.

As noted above, Southern is pursuing a handset-based solution utilizing Motorola's A-GPS technology. ALI-capable handsets for this solution are currently available. Southern began selling its first handset model that features A-GPS technology in December 2002 and began selling a second model that includes such technology in February 2003. Southern currently anticipates being able to begin selling a third model that features A-GPS technology in November 2003.

Southern would note that there is some uncertainty regarding the conversion to ALI-capable handsets for certain of its public safety customers. A portion of Southern's customer base is comprised of public safety users such as law enforcement, electric utility employees, police and fire departments, and other government employees who use Southern's service for their critical communications. Because of the nature of their work environment, many of these customers require specially designed handsets that are built to military specifications for shock, dust, and moisture and operate at a more powerful wattage than typical consumer-grade handsets. At present, it is unclear whether Motorola, the manufacturer, will produce such handsets with ALI capability, or if so, when they will be available. In addition, it is unclear whether users of these handsets, many of which are government agencies, can or will pay to upgrade to A-GPS equipped handsets.

Southern has extensively discussed development of ALI-capable military specification handsets with Motorola. To date, however, Motorola's plans for A-GPS capable handsets are uncommitted with regard to this particular segment of its product line. Southern will continue to seek a solution for this matter.

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

At this point, Southern anticipates being able to make Phase II service available by September 1, 2003, the deadline established in the *Order to Stay*.

Southern is continuing to work with its testing contractor to understand the overall performance of its A-GPS solution and whether the technology will meet the degree of accuracy specified in the FCC's rules. Anomalies identified in earlier testing required further work by Southern with both Motorola and its testing contractor, and accuracy testing will be finalized in August 2003. Southern is hopeful that the final results will verify that Southern will meet the accuracy standards for Phase II E911.

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

At this point, Southern does not foresee any specific problems that would cause it to miss the ultimate implementation date of December 31, 2005, in accordance with the benchmarks set forth in its September 18, 2001 *Petition for Limited Waiver*.[3] Southern would note that those benchmarks take into account its concerns with potentially not being able to provide ALI-capable handsets to public safety customers that currently utilize military specification handsets (see Southern's response to Question IV, above).

Southern would also note that there are a number of variables in the CMRS marketplace, including customers' willingness to purchase new handsets, that could affect the percent of location-capable handsets that are deployed by December 31, 2005.

Accordingly, Southern's sales benchmarks, as set forth in its September 18, 2001 *Petition for Limited Waiver*, remain as follows:

- 50% of all new iDEN handsets sold by Southern LINC by December 31, 2003;
- 100% of all new iDEN handsets sold by Southern LINC by December 31, 2004, to non-public safety customers; and

[3] In re Revision of the Commission's Rules to Ensure Compatibility With Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, *Southern LINC Petition for Limited Waiver of Section 20.18 of the Commission's Rules*, p. 24 (filed Sept. 18, 2001).

- 95% of Southern's interconnected, non-public safety iDEN customer base by December 31, 2005.[4]

* * *

We trust the foregoing are responsive to the Commission's inquiries. If you have any questions or concerns regarding this *Report*, please do not hesitate to contact the undersigned.

Very truly yours,

/s/ Michael D. Rosenthal

Michael D. Rosenthal
Director of Regulatory Affairs

cc: John B. Muleta
David H. Solomon

Contact Information

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[4] In re Revision of the Commission's Rules to Ensure Compatibility With Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, *Southern LINC Petition for Limited Waiver of Section 20.18 of the Commission's Rules*, p. 24 (filed Sept. 18, 2001).

AFFIDAVIT OF ROBERT G. DAWSON

I, Robert G. Dawson, hereby declare as follows:

1. I am President and CEO of Southern Communications Services, Inc. d/b/a Southern LINC. In those roles, I am familiar with Southern LINC's E911 deployment efforts and progress.

2. I have read the foregoing *Interim Report on Implementation of E911 Automatic Location Identification.* To the best of my knowledge, information, and belief, all of the information contained in the *Interim Report on Implementation of E911 Automatic Location Identification* is true and accurate.

I declare under penalty of perjury that the following is true and correct. Executed on July 31, 2003 in Atlanta, Georgia.

Robert G. Dawson
President and CEO
Southern Communications Services, Inc.
d/b/a Southern LINC