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August 1, 2003

Marlene Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: Valley Telecommunications Company, Inc.  
CC Docket No. 94-102  
E911 Phase II Interim Implementation Report

Dear Ms Dortch:

Pursuant to the Commission's Enhanced 911 ("E911") Rules,<sup>1</sup> Valley Telecommunications Company, Inc. hereby submits its E911 Phase II Interim Implementation Report to assist the Commission in monitoring the company's progress in deploying Phase II E911 technology.

Please contact the undersigned if you have any questions regarding this report.

Sincerely,



John Kuykendall  
Its Attorney

Enclosure

cc: John Muleta, Chief, Wireless Telecommunications Bureau  
David Solomon, Chief, Enforcement Bureau  
Qualex International

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<sup>1</sup> See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems: Order to Stay*, CC Docket No. 94-102 (rel. July 26, 2002); *Wireless Telecommunications Bureau Provides Further Guidance on Interim Report Filings By Small Sized Carriers: Public Notice*, CC Docket No. 94-102, DA 03-2113 (rel. June 30, 2003).



**VALLEY TELECOMMUNICATIONS COMPANY, INC.  
E911 PHASE II INTERIM IMPLEMENTATION REPORT  
FOR TIER III CARRIERS  
August 1, 2003**

Valley Telecommunications Company, Inc. ("Valley"), pursuant to the Commission's Enhanced 911 ("E911) Rules,<sup>1</sup> hereby submits its E911 Phase II Interim Implementation Report to assist the Commission in monitoring Valley's progress in deploying Phase II E911 technology.

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

Three separate Public Safety Answering Point ("PSAP") jurisdictions exist within Valley's service area. Valley has received a Phase I request from one of the PSAPs and will be able to accommodate that request within the required timeframe. Valley has not received a Phase II request from either PSAP.

**II. The carrier's specific technology choice:**

Valley's system utilizes analog and digital technology, with the digital being TDMA. Valley has chosen to implement a network-based Phase II solution. The company plans to implement a CDMA2000 network in the near future, which would provide the option of using a handset-based approach. Valley estimates that the cost of implementing Phase II E911 network-based solution in its system will be approximately \$1 million. The State of Arizona has a fund available to assist carriers with the cost of implementing E911 solutions; however, the State cautions that the fund will be underfunded by \$11.5 million by FY 2004. Consequently, Valley is not likely to recover any costs of implementing E911 from the State.

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

Valley is not required to implement a Phase II solution at this time because it has not received a PSAP request. Nevertheless, Valley has begun working with the PSAPs,

<sup>1</sup> See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems: Order to Stay, CC Docket No. 94-102 (rel. July 26, 2002); Wireless Telecommunications Bureau Provides Further Guidance on Interim Report Filings By Small Sized Carriers: Public Notice, CC Docket No. 94-102, DA 03-2113 (rel. June 30, 2003).

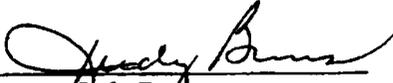
the local exchange carrier and Valley's switch vendor to determine exactly what upgrades/ modifications to its system will be necessary to provide a Phase II E911 solution.

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

Valley will continue to work toward becoming Phase II compliant. If and when Valley receives a Phase II request, and assuming the maintenance of current requirements and timeframes, Valley may find it necessary to seek waiver of some elements of the requirement to implement a Phase II solution due to the significant cost involved in upgrading its system, the additional towers necessary to meet the accuracy requirements, and/or the limited time in which to implement the solution given construction constraints.

## AFFIDAVIT OF JUDY BRUNS

I, Judy Bruns, CEO for Valley Telecommunications Company, Inc., do hereby declare under penalty of perjury that I have read the foregoing "E911 Phase II Interim Implementation Report for Tier III Carriers" and that the facts stated therein are true and correct, to the best of my knowledge, information and belief.

  
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Judy Bruns