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August 1, 2003

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

Re: Panhandle Telecommunication Systems, Inc.
CC Docket No. 94-102
E911 Phase II Interim Implementation Report

Dear Ms Dortch:

Pursuant to the Commission's Enhanced 911 ("E911") Rules,[1] Panhandle Telecommunication Systems, 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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1 *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).

PANHANDLE TELECOMMUNICATION SYSTEMS, INC.
E911 PHASE II INTERIM IMPLEMENTATION REPORT
FOR TIER III CARRIERS
August 1, 2003

Panhandle Telecommunication Systems, Inc. ("PTSI"), pursuant to the Commission's Enhanced 911 ("E911") Rules,[1] hereby submits its E911 Phase II Interim Implementation Report to assist the Commission in monitoring PTSI'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):

PTSI serves three counties in Oklahoma and two counties in Kansas. The company has not received a valid Phase I or Phase II request from any of these jurisdictions.

II. The carrier's specific technology choice:

PTSI's system utilizes analog and digital technology, with the digital being TDMA. PTSI has chosen to implement a network-based Phase II solution. PTSI has been unable to identify any vendor that provides location-capable analog or TDMA handsets. Further, at this point in time, converting to a technology that supports a handset-based Phase II solution would not be in the subscribers' best interest. A large percentage of PTSI's subscribers maximize their access to PTSI's service through the use of three-watt analog phones. Lower watt digital cellular phones do not provide users with the same level of reliable service and, consequently, are not in demand by many of PTSI's subscribers.

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

PTSI is not required to implement a Phase II solution at this time because it has not received a PSAP request. Nevertheless, PTSI has sought to coordinate implementation of E911 services with PSAPs in its service area.[2]

The company estimates that the cost of implementing Phase II E911 in its system will be exorbitantly expensive.[3] It is unknown whether the states of Oklahoma and Kansas will provide funding to assist carriers with the cost of implementing a Phase II E911 solution.

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[1] *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).

[2] PTSI reports that one of the PSAPs has indicated that it is not ready to accept even basic wireless 911 calls. Accordingly, PTSI forwards 911 calls in that jurisdiction to the highway patrol.

[3] The only viable network-based vendors that have been identified are Grayson Wireless and TruePosition, which have solutions that are extraordinarily burdensome for a small and rural carrier. *See,* The Rural Cellular Association Carrier Reports on Implementation of Wireless E911 Phase II Automatic Location Identification: CC Docket No. 94-102, filed November 9, 2000 (citing record evidence that the cost of deployment of Grayson

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

PTSI will continue to work toward becoming Phase II compliant. If and when PTSI receives a Phase II request, and assuming the maintenance of current requirements and timeframes, PTSI 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.

Wireless' solution is estimated to be approximately $25,000 per cell site plus a $65,000 central control system and the cost of TruePosition's solution is estimated to be approximately $36,000 per cell site).

AFFIDAVIT OF RON STRECKER

I, Ron Strecker, Chief Executive Officer for Panhandle Telecommunication Systems, 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.

Ron Strecker