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August 1, 2003

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

Re: MobileTel, LLC
CC Docket No. 94-102
E911 Phase II Interim Implementation Report

Dear Ms Dortch:

Pursuant to the Commission's Enhanced 911 ("E911") Rules,¹ MobileTel, LLC 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

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).

MOBILETEL, LLC
E911 PHASE II INTERIM IMPLEMENTATION REPORT
FOR TIER III CARRIERS
August 1, 2003

MobileTel, LLC (“MobileTel”), 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 MobileTel’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):

MobileTel provides cellular and PCS service to the rural Louisiana parishes of Lafourche, St. Mary and Terrebonne, and to Grand Isle, utilizing analog and TDMA technologies. MobileTel has received valid Phase I requests from Lafourche, St. Mary and Terrebonne parishes and provides Phase I service to these parishes. MobileTel has not received a valid Phase II request from any of the jurisdictions.

II. The carrier’s specific technology choice:

MobileTel previously notified the Commission that the company had selected a network-based solution.² After making a diligent investigation into deploying a network-based solution, MobileTel found that this approach is not economically or technically feasible in its service area. Accordingly, to satisfy the E911 mandate and other competitive and market demands, MobileTel has determined that it must migrate to a CDMA technology that supports a handset-based solution.³ MobileTel recently initiated the process of installing the CDMA technology and anticipates that a majority of its customers will have transitioned to this technology by December 31, 2007. Accordingly, the company hereby amends its report to specify that MobileTel has selected a handset-based solution.

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 On January 9, 2001, MobileTel filed a report with the Commission stating its intention to implement a handset-based Phase II E911 solution. Subsequently, on September 19, 2001, MobileTel amended its report notifying the Commission of its decision to switch to a network-based solution. MobileTel reported that it had been unable to identify any vendor that could provide a handset-based solution for these technologies.

³ A request for temporary waiver of the Phase II E911 obligations, which is being submitted concurrently with this report, seeks extension of the Commission’s timetable for deployment of a handset-based solution pursuant to the revised schedule set forth in the waiver request and in this report. MobileTel anticipates that its transition to CDMA will nonetheless result in continued utilization of the TDMA/analog portion of its network for some time. Because MobileTel has not received any Phase II requests from PSAPs, its compliance status has not yet been affected.

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

The company has selected Nortel as its vendor and issued purchase orders for the CDMA equipment. Deployment of CDMA technology is anticipated to begin in the September/October 2003 timeframe, and MobileTel expects to begin marketing CDMA service in Lafourche and Terrebonne parishes by late 2004. A complete overlay of its existing analog/TDMA system should occur in approximately April 2005.

MobileTel has been coordinating with the PSAPs in its service area regarding their plans to begin receiving the Phase II information and does not anticipate that any PSAP will require the Phase II information until after the company has fully implemented its CDMA technology.⁴ Accordingly, subscribers will not be harmed by the delay in the sale of ALI-capable handsets since no PSAP would be receiving the Phase II information until the revised implementation schedule is initiated.

IV. Information Regarding Availability of ALI-Capable Handsets

Because MobileTel does not plan to begin marketing its CDMA phones until late 2004, it has not begun ordering CDMA ALI-capable handsets. MobileTel is aware, however, that ALI-capable handsets are available for CDMA networks⁵ and anticipates that more models will be available when it begins to actively market CDMA phones.

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

MobileTel anticipates deploying Phase II service according to the following benchmarks

- (i) January 1, 2005 - begin selling and activating ALI-capable CDMA handsets;
- (ii) March 31, 2005 - ensure that at least 25% of all new CDMA handsets activated are ALI-capable;
- (iii) September 30, 2005 - ensure that at least 50% of all new CDMA handsets are ALI-capable;

⁴ Through these coordinated efforts, MobileTel is aware that no PSAP in areas in which the company currently provides service plans to make any requests for Phase II information for at least a year. One of the PSAPs in MobileTel's service area is constructing a new facility and has informed MobileTel that it does not plan to have the new facility operational for at least a year. Other PSAPs have informed MobileTel that they do not plan to make any requests in the near future. MobileTel hereby commits to continue coordinating with the PSAPs in its service area during the phased-in implementation period.

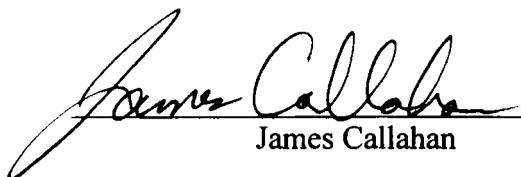
⁵ See, e.g., *Revision of the Commission's Rules To Ensure Compatibility With Enhanced 911 Emergency Systems; Request for a Limited and Temporary Rule Waiver by Sprint Corporation: Order*, CC Docket No. 94-102 at para.13 (rel. June 16, 2003) (Commission citing Sprint's fifth and six quarterly reports in which the CDMA carrier stated that as of March 2003, it was selling 15 different GPS-enabled handsets).

- (iv) March 31, 2006 - ensure that 100% of all new CDMA handsets activated are ALI-capable.
- (v) By December 31, 2007 – ensure that 95% of CDMA subscribers have ALI-capable handsets.⁶

⁶ MobileTel anticipates that most of its TDMA customers will have migrated to CDMA technology by the end of 2007, having experienced typical phone-life of two-years for digital customers. The company also anticipates that many of its analog customers will have migrated to CDMA technology by that date since roaming for analog subscribers will likely be significantly curtailed due to the impending sunset of the requirement that cellular carriers provide analog service. Some of MobileTel's analog customers, however, utilize three-watt phones, which undoubtedly will continue to provide better coverage in some rural areas than the lower watt CDMA digital phones. Accordingly, these customers may wish to continue to use their analog phones rather than transition to phones which are ALI-capable. To encourage the TDMA and analog subscribers to transition, MobileTel will engage in an extensive effort to educate these customers regarding the public safety benefits that would be afforded to these customers were they to transition to CDMA ALI-capable phones. Moreover, this effort will include specific information regarding the deficiencies of analog service with respect to emergency services, *i.e.*, that location information will not be available to emergency service providers when consumers utilize analog phones. In this manner, consumers will be fully apprised of the effect of their choice to maintain analog phones, and will therefore be able to make an informed and educated choice regarding available services.

AFFIDAVIT OF JAMES CALLAHAN

I, James Callahan, President of MobileTel, LLC (“MobileTel”), 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.


James Callahan