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August 1, 2003

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

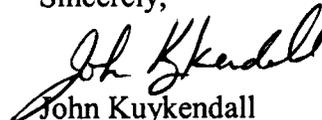
Re: Poka Lambro Telecommunications, Ltd dba Digital Cellular of Texas  
CC Docket No. 94-102  
E911 Phase II Interim Implementation Report

Dear Ms Dortch:

Pursuant to the Commission's Enhanced 911 ("E911") Rules,<sup>1</sup> Poka Lambro Telecommunications, Ltd dba Digital Cellular of Texas 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).

**POKA LAMBRO TELECOMMUNICATIONS, LTD. dba DIGITAL CELLULAR OF TEXAS**

**E911 PHASE II INTERIM IMPLEMENTATION REPORT  
FOR TIER III CARRIERS**

**August 1, 2003**

Poka Lambro Telecommunications, Ltd. dba Digital Cellular of Texas ("Poka Lambro"), 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 Poka Lambro'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):**

Seven separate Public Safety Answering Point ("PSAP") jurisdictions exist within Poka Lambro's service area. Poka Lambro has received a Phase I request from all seven PSAPs and has accommodated all of their requests. Poka Lambro has not received a Phase II request from any of the PSAPs.

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

Poka Lambro's system utilizes analog and digital technology, with the digital being TDMA. Poka Lambro has chosen to implement a network-based Phase II solution. Poka Lambro 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 Poka Lambro's subscribers maximize their access to Poka Lambro'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 Poka Lambro's subscribers.

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

Poka Lambro estimates that the upfront cost of implementing a network-based Phase II E911 in its system will be approximately \$2.58 million, with a monthly recurring charge of \$15,480. In addition to the cost of implementing a Phase II solution, Poka Lambro is incurring substantial costs to upgrade its system to comply with the Commission's mandates for wireless number portability, digital TTY services and CALEA. At the same time, wireless revenues continue to decline due to the very low rates that Poka Lambro must charge its subscribers in order to compete with other wireless carriers. It is unknown whether the state of Texas will provide funding for carriers to implement Phase II. According to the Texas Commission on

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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).

State Emergency Communications (“CSEC”), “CSEC simply has not been appropriated the monies necessary to address Phase II implementation if CSEC must reimburse wireless providers expenses other than its own costs necessary to implement wireless E911 Phase II service.”<sup>2</sup> Without financial assistance, Poka Lambro cannot even begin ordering the necessary equipment.

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

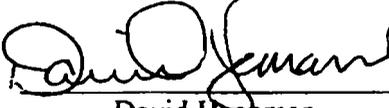
Poka Lambro has not received any Phase II requests from PSAPs. Accordingly, it is not currently required to implement a network-based solution. If and when Poka Lambro receives a Phase II request, and assuming the maintenance of current requirements and timeframes, the company may find it necessary to 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.

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<sup>2</sup> See Letter from Paul Mallett, Executive Director, Texas Commission on State Emergency Communications, to David Hageman (July 1, 2002).

## AFFIDAVIT OF DAVID HAGEMAN

I, David Hageman, Vice President Wireless Operations for Poka Lambro Telecommunications, Ltd. dba Digital Cellular of Texas, 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.



David Hageman