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August 1, 2003

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

Re: TMP Corp. and TMP Jacksonville, LLC
CC Docket No. 94-102
Joint E911 Phase II Interim Implementation Report

Dear Ms Dortch:

Pursuant to the Commission's Enhanced 911 ("E911") Rules,¹ TMP Corp. and TMP Jacksonville, LLC hereby jointly 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 Kuykenda
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).

TMP CORP. and TMP JACKSONVILLE, LLC
JOINT E911 PHASE II INTERIM IMPLEMENTATION REPORT
FOR TIER III CARRIERS
August 1, 2003

TMP Corp. and TMP Jacksonville, LLC (hereinafter collectively referred to as "TMP") 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 the carriers' progress in deploying Phase II E911 technology. The companies are filing this report jointly because they are affiliates and utilize the same switch and related facilities.²

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

Seventeen separate Public Safety Answering Point ("PSAP") jurisdictions exist within TMP's service area, including two PSAPs in BTA 161, where TMP is licensed to provide service but has not yet commenced service. TMP has received a Phase I request from one PSAP and has accommodated that request. TMP has not received a Phase II request from any of the PSAPs.

II. The carrier's specific technology choice:

TMP's system utilizes GSM digital technology. When the companies made their initial selection of a location technology, they found that a hybrid solution utilizing Enhanced Observed Time Difference ("E-OTD") technology was the most viable option.³ With the recent abandonment of this technology by the large carriers, however, TMP has decided that it must change its selection of location-based technology to specify a network-based solution.⁴

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 TMP Jacksonville had sought waiver under the name of Quantum Communications Group, Inc. ("Quantum") before it was acquired by TMP Corp. See *In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems: Order to Stay*, CC Docket No. 94-102 at Appendix A (rel. July 26, 2002) (Commission listing Quantum as one of the non-nationwide carriers that filed a request for waiver of the Phase II requirements).

³ See *Petition for Waiver of TMP Corp.*, CC Docket No. 94-102, filed November 27, 2001 at 2 (citing record evidence that virtually all GSM carriers planned to deploy the E-OTD approach); *Petition for Waiver of Quantum*, filed November 30, 2001 at 2.

⁴ See, e.g., *In the Matter of T-Mobile USA, Inc.: Order*, File No. EB-02-TS-012, FCC 03-172 at para. 1 (rel. July 17, 2003) (noting that on March 21, 2003, T-Mobile notified the Commission that it had decided to implement a network-based Phase II solution in lieu of E-OTD); "T-Mobile Drops E-OTD; Joins AT&T and Cingular in GSM Bailout" *Wireless Week*, March 25, 2003 ed. (noting that AT&T Wireless and Cingular had decided not to use E-OTD in their GSM networks and citing T-Mobile as stating that the shift of these other large carriers away from E-OTD "likely would draw vendor time and resources away from further E-OTD development").

Accordingly, TMP hereby amends its report to specify the selection of a network-based solution.⁵

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

TMP has deployed a Phase I solution in two of its seventeen cell sites; however, TMP's current system is not capable of supporting a Phase II solution. To make its switch Phase II compliant and satisfy other Commission mandates, TMP is in the process of selecting a new switch vendor and anticipates having the new switch fully installed and tested no later than June 30, 2004. In addition to the costs of implementing the new switch, TMP estimates that the upfront cost of implementing Phase II E911 in its current cell sites will be approximately \$600,000, and \$1.2 million for all of the cell sites it intends to construct.

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

TMP has not received any Phase II requests from PSAPs. Accordingly, it is not currently required to implement a network-based solution. If and when TMP 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.

⁵ TMP is aware of QUALCOMM's claims that it is developing a chipset which incorporates assisted-GPS for the GSM air interface. *See* Ex Parte Letter to Ms. Marlene Dortch, Secretary from Dean R. Brenner, Attorney for QUALCOMM, CC Docket No. 94-102, dated July 8, 2003. It does not appear, however, that the will be commercially available until the end of next year. *Id.* Accordingly, at this time, TMP has no other alternative but to select a network-based solution.

AFFIDAVIT OF TREY LUTRICK

I, Trey Lutrick, CEO of TMP Corp. and TMP Jacksonville, LLC, 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.



Trey Lutrick