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August 1, 2003

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

Re: Texas RSA 20B2 Limited Partnership dba La Ward Cellular Exchange,
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 Texas RSA 20B2 Limited Partnership dba La Ward Cellular Exchange, 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

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).

**TEXAS RSA 20B2 LIMITED PARTNERSHIP dba LA WARD CELLULAR
EXCHANGE, INC.**

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

August 1, 2003

Texas RSA 20B2 Limited Partnership dba La Ward Cellular Exchange, Inc. ("Texas 20"), 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 Texas 20'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):

There are four counties within Texas 20's service area. Texas 20 has not received a valid Phase I or Phase II request from any of these counties.

II. The carrier's specific technology choice:

Texas 20's system utilizes analog and digital technology, with the digital being TDMA. Texas 20 operates off of Cingular's switch in Austin, Texas, and, consequently, is dependent upon Cingular to offer a Phase II solution. Texas 20 has chosen to implement a network-based Phase II solution. The company estimates that the cost of implementing Phase II E911 in its system will be exorbitantly expensive.² The State of Texas does not have funds available to assist carriers with the cost of implementing a Phase II E911 solution.

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

As indicated above, Cingular, not Texas 20, owns the switch that serves Texas 20's subscribers. Therefore, Texas 20 does not have the ability to order or install the equipment necessary to provide a Phase II 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).

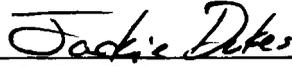
² The only two network-based vendors that have been identified are Grayson Wireless and TruePosition, which have solutions that are extraordinarily burdensome for a small and rural carrier. See, *The Rural Cellular Association Carrier Reports on Implementation of Wireless E911 Phase II Automatic Location Identification*: CC Docket No. 94-102, filed November 9, 2000 (citing record evidence that the cost of deployment of Grayson 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).

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

Texas 20 will continue to work toward becoming Phase II compliant. If and when Texas 20 receives a Phase II request, and assuming the maintenance of current requirements and timeframes, Texas 20 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 JACKIE DUKES

I, Jackie Dukes, Vice President of Texas RSA 20B2 Limited Partnership dba La Ward Cellular Exchange, 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.



Jackie Dukes

JMK