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August 1, 2003

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

Re: South Canaan Cellular Communications Company, L.P.
CC Docket No. 94-102
E911 Phase II Interim Implementation Report

Dear Ms Dortch:

Pursuant to the Commission's Enhanced 911 ("E911") Rules,¹ South Canaan Cellular Communications Company, L.P. 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).

SOUTH CANAAN CELLULAR COMMUNICATIONS COMPANY, L.P.
E911 PHASE II INTERIM IMPLEMENTATION REPORT
FOR TIER III CARRIERS
August 1, 2003

South Canaan Cellular Communications Company, L.P. (“South Canaan”), 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 South Canaan’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):

South Canaan provides analog cellular service to the rural Pennsylvania counties of Pike and Wayne. South Canaan has received valid Phase I request from Pike county and provides Phase I service to this county. South Canaan has also received a Phase II request from Pike County. The company has not received a Phase I or a Phase II request from Wayne County.

II. The carrier’s specific technology choice:

South Canaan initially selected a hybrid network/handset-based solution. Because no handset-based solutions have been developed for analog systems, South Canaan has made a diligent investigation into deploying a network-based solution. The company found, however, that this approach is not economically or technically feasible in its service area.² Accordingly, to satisfy the E911 mandate and other competitive and market demands, South Canaan has determined that it must migrate to a CDMA technology that supports a handset-based solution.³ South Canaan has 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.

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).

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 hybrid network/handset-based solution pursuant to the revised schedule set forth in the waiver request and in this report. South Canaan anticipates that its transition to CDMA will nonetheless result in continued utilization of the analog portion of its network for some time. As explained below, South Canaan commits to educating analog subscribers regarding the benefits of E911 Phase II service, available only in the event these subscribers transition to CDMA phones.

Accordingly, the company hereby amends its report to include its CDMA technology in its plans to implement a hybrid network/handset-based solution.⁴

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

The company has selected Lucent as its vendor and is in the process of issuing purchase orders for the CDMA equipment. Because the process involves multiple, sequential upgrades at its switch and at each cell site, South Canaan estimates that it will not have a complete overlay of its existing analog service until the end of 2004.

IV. Information Regarding Availability of ALI-Capable Handsets

South Canaan has already ordered tri-mode (800MHz analog - 800MHz CDMA digital - 1900 MZ CDMA digital) ALI-capable handsets. South Canaan anticipates meeting all required deadlines for selling and activating ALI-capable CDMA handsets.

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

South Canaan 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;
- (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.⁵

⁴ As the Commission has found, handset-based solutions “seem well-suited to rural areas” and are superior to network-based solutions on CDMA systems. See *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems: Third Report and Order*, 14 FCC Rcd 17388, 17400-02 (1999).

⁵ South Canaan anticipates that many of its analog customers will have migrated to CDMA technology by December 31, 2007, 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 South Canaan'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 analog subscribers to transition, South Canaan 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 CAROLYN C. COPP

I, Carolyn C. Copp, President of South Canaan Cellular Communications Company, L.P., 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.



Carolyn C. Copp