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August 1, 2003

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

Re: Coleman County Telecommunications, Ltd.
CC Docket No. 94-102
E911 Phase II Interim Implementation Report

Dear Ms Dortch:

Pursuant to the Commission's Enhanced 911 ("E911") Rules,¹ Coleman County Telecommunications, Ltd. 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).

COLEMAN COUNTY TELECOMMUNICATIONS, LTD.
E911 PHASE II INTERIM IMPLEMENTATION REPORT
FOR TIER III CARRIERS
August 1, 2003

Coleman County Telecommunications, Ltd. ("Coleman") 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.

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

Coleman serves four counties in Texas. The company has not received a valid Phase I or Phase II request from any of these jurisdictions.

II. The carrier's specific technology choice:

Coleman's system utilizes GSM digital technology. When the company made its initial selection of a location technology, it found that a hybrid solution utilizing Enhanced Observed Time Difference ("E-OTD") technology was the most viable option.² With the recent abandonment of this technology by the large carriers, however, Coleman has decided that it must change its selection of location-based technology to specify a network-based solution.³ Accordingly, Coleman hereby amends its report to specify the selection of 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 See Amended Petition for Waiver of Coleman, CC Docket No. 94-102, filed April 11, 2002 at 5 (citing record evidence that virtually all GSM carriers planned to deploy the E-OTD approach).

³ 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").

⁴ Coleman 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 chipset will be commercially available until the end of next year. *Id.* Accordingly, at this time, Coleman has no other alternative but to select a network-based solution.

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

Coleman is not required to implement a Phase II solution at this time because it has not received a PSAP request. The company estimates that the cost of implementing a network-based Phase II E911 in its system will be exorbitantly expensive.⁵ It is unknown whether the State of Texas will provide funding to assist carriers with the cost of implementing a Phase II E911 solution.

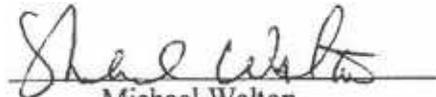
IV. The estimated date on which Phase II service will first be available in the carrier's network:

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

AFFIDAVIT OF MICHAEL WALTON

I, Michael Walton, CEO of Coleman County Telecommunications, Ltd., 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.


Michael Walton