

**3 RIVERS PCS, INC. d/b/a
3 RIVERS WIRELESS
P.O. BOX 3387
GREAT FALLS, MONTANA 59403-3387**

Marlene Dortch, Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

**Re: CC Docket No. 94-102
Broadband PCS Station WPOI209
Eleventh Quarterly Report**

Dear Ms. Dortch:

This report is filed pursuant to the Commission's *Fourth Report and Order*, in CC Docket No. 94-102, released December 14, 2000.

3 Rivers PCS, Inc. d/b/a 3 Rivers Wireless (3 Rivers) is the licensee of station WPOI209 in the Broadband Personal Communications Service (PCS). Station WPOI209 is a license partitioned from the 30 MHz Block A license granted to GTE Macro Communications Corporation (GTE), on June 23, 1995, for the Spokane-Billings Major Trading Area (MTA). On April 17, 1997, the Commission approved the application to partition to 3 Rivers a portion of GTE's license for the Spokane-Billings MTA, to include the Great Falls, Billings, Bozeman, Helena and Butte (except for Powell County) Basic Trading Areas. 3 Rivers utilizes Nortel Networks' CDMA equipment for its PCS network.

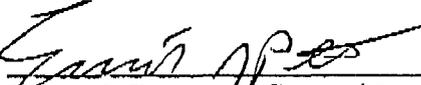
We are continuing to work with our switch supplier, Nortel Networks, and our handset vendors toward effecting compliance with the Commission's requirements for

providing TTY access to E-911 calling systems over our PCS facilities. The attachment hereto details the progress we have made as of September 30, 2003.

Respectfully submitted,

**3 RIVERS PCS, INC. d/b/a
3 RIVERS WIRELESS**

By:



Ernest J. Peterson, General Manager

Dated: October 15, 2003

Any inquiries concerning this filing should be referred to:

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**3 Rivers PCS, Incorporated d/b/a 3 Rivers Wireless
E911 TTY Device Capability Report as of September 30, 2003**

Network and Infrastructure Development – 3 Rivers has completed its installation of the new Nortel switch required to maintain the software load that is needed to become compliant with the Commission's TTY access requirement (MTX 10.x). We have successfully moved the wireline switch to its own platform and are working to move the wireless switch to its own standalone MTX platform. There have been several roadblocks in the completion of the wireless MTX migration. We are currently working in conjunction with Nortel to resolve the technical issues. Our current timetable to migration to the MTX 10.x platform is November of 2003. Barring any unforeseen technical issues, 3 Rivers believes it will be in full compliance with the TTY access requirement by the end of November..

Handset Development and Testing Plans – 3 Rivers is still continuing to carry the handsets that were listed in our Tenth Quarterly Report. In addition to those handsets, we have obtained several test models of the Motorola 120e. This handset is the only one listed with Harris Communications as being compatible with its digital TTY terminal. We have only a few of the Motorola handsets and are waiting to become compliant in order to test them. We may possibly obtain a digital TTY terminal from Harris in order to facilitate any testing needs we may have.

Beta and Lab Testing – Our plan to test with the Montana School for the Deaf and Blind is still on our roadmap to compliance. In order to facilitate this testing, we have placed several handsets in the hands of some of the students at this school. When we are ready to begin testing, these students will have a general knowledge of the functions of the handsets. 3 Rivers plans to begin testing with these students once compliance is achieved. The development of a full test plan and acceptance is in the works. 3 Rivers will have a better idea of what is required in order to achieve this once its full infrastructure upgrade is complete.

Release and General Availability to Carriers of Network Infrastructure Software – The software is currently available for release. 3 Rivers will have to continue to work through the process of installing its new switch in order to become compatible with the newer Nortel software releases. *See projected scheduling the Ninth and Tenth Quarterly Report and explanation in Network and Infrastructure Development.*

Availability to Carriers of Full Digital Acceptance Test Units – These units are still difficult to obtain by the small wireless carriers. We are normally about 6-12 months behind the large carriers in obtaining new stock. Our goal is to continue to work with any vendor we can to obtain the proper hardware to offer to our consumers.

Efforts Toward Achieving Digital Wireless Solution Compatibility w/ Enhanced TTY – 3 Rivers is still pursuing all efforts toward achieving a full digital solution. With the efforts we have taken with MTAP (Montana Telecommunication Access Protocol) and the strides we have made with getting handsets into the hands of several students of the Montana School for the Deaf and Blind, we believe that we are headed down the right path to success. 3 Rivers has made strides in its infrastructure upgrades and is working to complete each aspect to become compliant. Please refer to *Network and Infrastructure Development* for more details.

Carrier Coordination with the PSAP – 3 Rivers will coordinate with each individual PSAP in its service area once the service has been deployed. All coordination with each PSAP will be done on a case-by-case basis.

Carrier Testing Activities, Including Field Testing, Consumer End-To-End Testing, and Other Necessary Tests – Each of these tests will be accomplished once equipment, software, deployment, installation, and turn-up are completed, which is expected by the end of November. We are now working to put an orderly test plan into effect.

Retail Availability of Necessary Consumer Equipment – 3 Rivers is currently offering several new models of handsets that are TTY compliant. From Kyocera, we offer the KE414, KE424c, and the SE47 . From LG, the VX440, VX10, and the VX3100. This is in addition to the other handsets that were mentioned in our Ninth and Tenth Quarterly Reports.

Geographic Scope of Network Infrastructure Deployment – We have one MTX switch for the state of Montana; therefore deployment will be system wide. *See Network and Infrastructure Development.*