

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of )  
)  
Revision of the Commission's Rules ) CC Docket No. 94-102  
To Ensure Compatibility with Enhanced 911 )  
Emergency Calling Systems )  
)  
Phase II Compliance Deadlines for Non- )  
Nationwide CMRS Carriers )  
)

To: The Commission

**SECOND INTERIM REPORT REGARDING E911 PHASE II DEPLOYMENT**  
**MISSOURI RSA # 5 PARTNERSHIP D/B/A CHARITON VALLEY WIRELESS**  
**SERVICES**

Missouri RSA # 5 Partnership d/b/a Chariton Valley Wireless Services ("Chariton Valley") hereby submits this Second Interim Report on E911 Phase II deployment as required by the Commission's *Stay Order*.<sup>1</sup> Chariton Valley is a Tier III wireless carrier that had previously sought additional time to comply with the Commission's E911 Phase II rules and is subject to the limited relief afforded to certain Tier III carriers by the *Non-Nationwide Carrier Order*.<sup>2</sup> The following report is intended to provide the information outlined by the Commission in its June 30, 2003 public notice providing guidance on Interim Report filings by small sized carriers (DA-03-2113), as required by the *Stay Order*.

**1. Phase I and Phase II Requests**

Chariton Valley has received no additional public safety answering point ("PSAP") requests since the filing of its August 1, 2003 Interim Report. As Chariton Valley reported in its August 1, 2003 Interim Report, it has received seven PSAP requests for Phase I service, four of which are valid, and has complied with each of the four valid requests. In providing Phase I service, Chariton Valley has had to route E911 interLATA calls through the Missouri Network Alliance and SBC Communications Inc. in order to

---

<sup>1</sup> *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, CC Docket 94-102, Order to Stay, FCC 03-241 (rel. October 10, 2003) ("*Stay Order*").

<sup>2</sup> *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket 94-102, Order to Stay, FCC 02-210 (rel. July 26, 2002) (*Non-Nationwide Carrier Order*).

deliver emergency traffic. Chariton Valley continues to pay high costs for the circuits on each leg of this journey.

Chariton Valley received one request for Phase II service from the Macon County PSAP. The request was received on January 24, 2003. Chariton Valley reported in its August 1, 2003 Interim Report that it was unable to meet the Macon County Phase II request due to the necessary switch upgrade and the need to migrate to a Phase II compatible technology. Chariton Valley had initially estimated that it could not meet the Macon County request until September 1, 2004. Due to Chariton Valley's implementation progress, discussed in its December 1, 2003 Supplement to and Amendment of Petition for Waiver of Section 20.18(f) of the Commission's Rules ("Supplement"), Chariton Valley now expects to provide Phase II service to 100 percent of the Macon County PSAP service area by April 30, 2004.

Chariton Valley has not received any additional requests for Phase II service. Chariton Valley fully expects to be able to provide Phase II service within six months of any new Phase II requests due to the recent progress in building out its Phase II network.

## **2. Specific Technology Choice**

Chariton Valley had originally committed to a handset-based ALI solution, but, as it reported in its August 1, 2003 Interim Report, is now pursuing a network-based solution. Further, Chariton Valley noted in its previous Interim Report that it was pursuing a GSM overlay. Chariton Valley expects to finish its GSM conversion by the end of February 2004. Chariton Valley has been working with TruePosition alongside Ericsson, Chariton Valley's switch manufacturer, to develop an implementation schedule for the location monitoring unit ("LMU") installation that will make individual cell sites Phase II capable using automatic location identification ("ALI") technology. Chariton Valley is also working with Intrado, chosen by Ericsson for delivering the location data to the selective router. Based on commitments from TruePosition and Intrado, Chariton Valley expects that the conversion of its cell sites will be completed, along with the requisite testing of the Phase II network and the testing of the delivery of data through the Intrado solution, by April 30, 2004.

## **3. Ordering/Installation Status**

Chariton Valley's switch upgrade is now complete for Phase I and Phase II purposes. Further, Chariton Valley expects to complete its migration from a TDMA-based network to a GSM-based network by the end of February 2004. Chariton Valley instituted a series of costly switch upgrades in order to make its network fully Phase I and Phase II compatible. The final switch upgrade for Phase II capability was completed on October 31, 2003. As demonstrated in its December 1, 2003 Supplement, Chariton Valley has ordered all the necessary ALI components to make its network Phase II compatible and is in the process of installing the equipment on its cell sites and throughout its network.

**4. Handset Availability**

Since Chariton Valley has switched to a network-based Phase II solution, it is no longer dependent upon ALI-capable handsets in order to provide Phase II service.

**5. Estimated Phase II Service Date**

Chariton Valley expects to be fully Phase II capable utilizing its network-based solution, by April 30, 2004.

**6. Ultimate Compliance**

The Commission's December 31, 2005 deadline for achieving a 95 percent penetration rate for ALI-capable handsets does not apply to Chariton Valley because it will be employing a network-based solution.

**DECLARATION OF WILLIAM BIERE**

I, William Biere, do hereby declare under penalty of perjury the following:

1. I am the General Manager of Missouri RSA # 5 Partnership d/b/a Chariton Valley Wireless Services.
2. I have read the foregoing "Second Interim Report Regarding E911 Phase II Deployment." I have personal knowledge of the facts set forth therein, and believe them to be true and correct.

\_\_\_\_\_/s/\_\_\_\_\_  
William Biere

\_\_\_\_\_  
January 14, 2004  
Date