

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

In the Matter of	)	
	)	
Revision of the Commission's Rules To	)	CC Docket No. 94-102
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**  
**SOUTH NO. 5 RSA LIMITED PARTNERSHIP D/B/A/ BRAZOS CELLULAR**  
**COMMUNICATIONS, LTD.**

South No. 5 RSA Limited Partnership d/b/a/ Brazos Cellular Communications, Ltd. (Brazos) hereby submits this Second Interim Report on E911 Phase II deployment as required by the Commission's *Stay Order*.<sup>1</sup> Brazos 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**

Brazos has received 3 Phase I requests. There have been no problems encountered in meeting these requests. To date, Brazos has not received any Phase II PSAP requests.

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<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*).

**2. Specific Technology Choice**

Brazos will meet its Phase II requirements utilizing an automatic location identification (“ALI”) handset-based solution. Brazos is in the midst of converting its TDMA system, for which no ALI-capable handsets are available, to a CDMA-based system. The decision to convert to CDMA was based on business and technical factors. An overriding technical factor was the availability of CDMA-based ALI-capable handsets. Brazos has begun its network overbuild and plans are to finish the transition to CDMA throughout its network by the end of the second quarter of 2004.

**3. Ordering/Installation Status**

Brazos expects to order all the necessary equipment from Nortel that will make Brazos’ network capable of handling Phase II data from ALI-capable CDMA handsets by the end of the first quarter of 2004.

**4. Handset Availability**

It is Brazos’ understanding that ALI-capable CDMA handsets are generally available. Brazos is investigating which CDMA-based ALI-capable handsets will work most effectively on its network once it is converted.

**5. Estimated Phase II Service Date**

Based on its implementation progress so far, Brazos expects to be able to begin selling and activating ALI-capable handsets by July 1, 2004.

**6. Ultimate Compliance**

As Brazos reported in its July 31, 2003 Interim Report, it is unlikely that Brazos will be fully Phase II compliant by December 31, 2005. Currently, approximately 15 percent of Brazos’ customers choose to receive analog service. Many of these customers are in rural areas and use analog phones operating at 3 watts (also known as “bag phones”) because of the greater range they can receive from these phones as compared to using 0.5 watt digital phones. It is unlikely that these customers could be induced to accept a lower level of service, or in some areas no service at all, just to have an ALI capable digital handset.

**DECLARATION OF LONNIE RUE**

I, Lonnie Rue, do hereby declare under penalty of perjury the following:

1. I am the Assistant Manager and Chief Financial Officer of South No. 5 RSA Limited Partnership d/b/a/ Brazos Cellular Communications, Ltd.
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/\_\_\_\_\_  
Lonnie Rue

\_\_\_\_\_/1/14/04\_\_\_\_\_  
Date