

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**  
**WIRELESS COMMUNICATIONS VENTURE**

Wireless Communications Venture (“WCV”) hereby submits this Second Interim Report on E911 Phase II deployment as required by the Commission’s *Stay Order*.<sup>1</sup> WCV 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 *Stay Order* and 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) and as required by the *Stay Order*.

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

As previously reported, the State of Minnesota sent a blanket PSAP request for Phase I service in February 2001. Although the request also contained language requesting Phase II service, the Phase II component of the request was invalid because the PSAPs in WCV’s service area were incapable of handling Phase II data.

In implementing Phase I, WCV experienced unanticipated delays based on the inability of its vendor, TCS, to timely deliver the database updates that are needed for system testing. These contractual difficulties have now been resolved and a service

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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*).

agreement is in place to complete Phase I testing. WCV anticipates being fully Phase I compliant within 30 days.

As indicated in its Waiver Supplement filed on November 17, 2003, WCV has been and continues to be working closely with state emergency services administrators with respect to Phase II deployment. The most recent correspondence exhibiting this ongoing dialog has been provided to the Commission in connection with the Waiver Supplement. As this correspondence indicates, WCV has discussed its proposed deployment timetable for Phase II compliance with the administrator of the Minnesota Statewide 9-1-1 Program and the State of Minnesota has approved the deployment schedule contained in WCV's Waiver Petition.

**2. Specific Technology Choice**

WCV currently operates a TDMA system and intends to meet its Phase II E911 requirements utilizing a handset-based solution. WCV is presently in the process of implementing a network overlay using CDMA technology, which will allow it to ultimately become ALI-capable.

**3. Ordering/Installation Status**

Required equipment has been identified for the overlay. WCV expects to complete equipment ordering by the end of the first quarter of 2004, which will allow it to meet its proposed deployment schedule.

**4. Handset Availability**

At this time, WCV does not anticipate difficulty in obtaining handsets to meet the deployment schedule set forth in its Waiver Request.

**5. Estimated Phase II Service Date**

In order to implement Phase II capability, WCV will have to transition its system from TDMA to an alternate technology. WCV is currently migrating its system to CDMA technology that will allow it to meet Phase II requirements using a handset-based solution. WCV anticipates that Phase II capability would first be available on portions of its network by the end of the second quarter of 2004.

**6. December 31, 2005 Deadline**

WCV is currently on schedule to meet the December 31, 2005 deadline. However, taking into account WCV's plans to begin replacing its TDMA technology with an ALI-capable technology and the likely resistance of some customers to replacing their older handsets, it is possible that WCV might not meet the Commission's December 31, 2005 deadline for achieving a 95 percent penetration rate for ALI-capable handsets.

