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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

April 19, 2004

Ms Marlene H. Dortch
Secretary of the Commission
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

John Muleta
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

David Solomon
Chief, Enforcement Bureau
Federal Communications Commission
445 12th Street, S W
Washington, DC 20554

Re. North Carolina RSA 1 Partnership
E911 Interim Report for Tier III Carriers
CC Docket No 94-102

Dear Ms. Dortch:

Pursuant to the Commission's Order to Stay, in the above referenced docket,¹ North Carolina RSA 1 Partnership d/b/a Ramcell of North Carolina ("Ramcell of North Carolina") hereby submits its E911 Interim Report for Tier III Carriers. This Report provides the Commission with the current status of Ramcell of North Carolina's E911 efforts and its progress towards compliance with the Commission's E911 Phase II benchmarks.²

¹ *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, E911 Compliance Deadlines for Non-Nationwide Tier III CMRS Carriers, CC Docket 94-102, Order to Stay, FCC 03-241, 18 FCC Rcd 20,987 (2003)*

² Ramcell of North Carolina respectfully requests waiver of the January 15, 2004 deadline for filing this Interim Report and asks that the Commission accept this report *nunc pro tunc* as of the applicable deadline. The delay in filing this Interim Report was the result of an administrative oversight. As this Report documents, Ramcell of North Carolina has been channeling its efforts into Phase I implementation.

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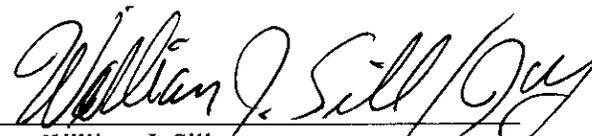
Ms Marlene H. Dortch
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Please do not hesitate to contact the undersigned with any questions that you may have at (202) 783-4141.

Sincerely,

WILKINSON BARKER KNAUER, LLP

By:


William J Sill
J Wade Lindsay

Attachment

INTERIM REPORT FOR TIER III CARRIERS

NORTH CAROLINA RSA 1 PARTNERSHIP Block B Licensee for the North Carolina 1 –Cherokee RSA

North Carolina RSA 1 Partnership (“NCR1P”) hereby provides the Commission with its E911 Interim Report (“Report”) for Tier III carriers.¹ As a Tier III carrier, NCR1P is submitting this Report in order to provide the Commission with the current status of its E911 efforts and its progress towards compliance with the Commission’s Phase II benchmarks. NCR1P is the cellular licensee on the Block B frequencies in the North Carolina 1 – Cherokee RSA (call sign KNKN890). In preparing the instant Report, NCR1P has followed the guidelines provided by the Commission in its June 30, 2003 Public Notice.²

NCR1P understands the importance of E911 and its obligation as a licensee to assist in ensuring that E911 connectivity for Phase I and Phase II service is properly implemented. NCR1P is using the services of Syniverse Technologies (“Syniverse”) (f/k/a Telecommunications Service Incorporated) to assist it with its E911 implementation. Syniverse is a third party vendor with years of experience in assisting wireless carriers, such as NCR1P, in their E911 implementation efforts by providing both project management and implementation services. Syniverse has played a key role in NCR1P’s E911 implementation process, coordinating the implementation process and assisting NCR1P with technical problems as they arose. Syniverse, with the participation of the relevant Public Safety Answering Points (“PSAPs”) and Local Exchange Carriers (“LECs”), developed an implementation process by which each party was assigned implementation tasks with mutually agreed upon deadlines. To ensure that the parties were all involved and kept current, Syniverse hosts periodic conference calls with all the parties to discuss developments and gauge progress.

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

NCR1P has received nine (9) Phase I requests from PSAPS throughout the NC-1 RSA and has deployed Phase I E911 service in all 9 counties. The nine Phase I requests were received from: Haywood County Communications Center PSAP; Clay County; Cherokee County Central Communications; Macon County Emergency Management; Jackson County Comm.; Graham County Communications Center; Swain County Communications Center; Cherokee Tribal 9-1-1, and; Transylvania County Communications Center.

NCR1P has received four requests for Phase II service which were dated as follows: Haywood County Communications Center PSAP – October 23, 2002, Graham County Communications Center – March 10, 2003, Swain County – March 3, 2003 (actually received by

¹ NCR1P respectfully requests waiver of the January 15, 2004 deadline for filing this Interim Report and asks that the Commission accept this report *nunc pro tunc* as of the applicable deadline. The delay in filing this Interim Report was the result of an administrative oversight.

² See Public Notice, Wireless Telecommunications Bureau Provides Further Guidance On Interim Report Filings by Small Sized Carriers, DA 03-2113, rel. June 30, 2003

Ramcell via fax on December 29, 2003), and Transylvania County 911 Center – January 19, 2004.

The carrier's specific technology choice (i.e., network-based or handset-based solutions, as well as the type of technology used):

As previously reported to the Commission, NCR1P is utilizing a handset-based location technology solution for Phase II E911. NCR1P has begun implementing this choice by selling the requisite ALI-capable handsets throughout its service area. Indeed, approximately 91% of NCR1P's handset sales in November and December, 2003 were for ALI-capable handsets. Thus, NCR1P met the September 1, 2003 and November 30, 2003 benchmarks.

Status on ordering and/or installing necessary network equipment.

NCR1P shares its switch with the cellular licensee in the Asheville, North Carolina MSA. The switch is capable of handling requests for Phase II E911 service, thus there is no additional equipment that will be needed to implement Phase II E911 service. Now that Phase I deployments have been completed, NCR1P believes that its cellular network will be able to more expeditiously carry Phase II traffic.

If the carrier is pursuing a handset-based solution, the Report must also include information on whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets:

As noted above, NCR1P is pursuing a handset-based solution and such handset sales comprised approximately 91% of NCR1P's handset sales.

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

NCR1P has received valid PSAP requests for Phase II service from the Haywood County Communications Center PSAP, Swain County Communications Center, the Graham County Communications Center, and the Transylvania County 911 Center. Currently, NCR1P is working to implement Phase II service and will work towards responding to the requests within the FCC's six-month time frame. For the remaining five PSAPs, without a valid PSAP request for E911 Phase II service, it is impossible for NCR1P to estimate when such service will be available to those PSAPs. Should these PSAPs request such service in the near future, however, NCR1P believes that it will be capable of responding to such a request within the FCC allocated six-month period.

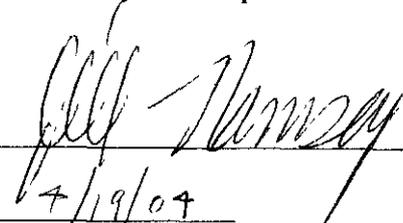
Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005.

NCR1P believes that the 95% penetration rate for ALI-capable phones by the December 31, 2005 deadline is achievable depending upon customer turn-over. NCR1P will continue to monitor its sale of ALI-capable phones

DECLARATION OF JILL RAMSEY

I, Jill Ramsey, am an officer of Ramcell, Inc., the managing general partner of North Carolina RSA 1 Partnership, d/b/a Ramcell of North Carolina, and I hereby certify that, to the best of my knowledge and belief, the information contained on this form and the attached document is complete and accurate

Signed



Date

7/19/07