

**Before the
Federal Communications Commission
Washington, D.C. 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)
)
E911 Compliance Deadlines for)
Non-Nationwide Tier III CMRS Carriers)

To: Wireless Telecommunications Bureau

**Report Regarding Phase II E911 Deployment
of Arctic Slope Telephone Association Cooperative, Inc.**

Arctic Slope Telephone Association Cooperative, Inc. ("ASTAC"), by its attorneys, pursuant to Section 20.18(i) of the Federal Communications Commission's ("FCC" or "Commission") Rules,¹ hereby informs the Commission that it has now chosen to pursue a network-based solution in order to provide Phase II enhanced 911 ("E911") location-capable services to its customers.

ASTAC presently operates an analog and time division multiple access ("TDMA") network for which no handset-based E911 location solutions are available. ASTAC has chosen to overlay its current network using a Global System for Mobile Communications ("GSM") air interface. ASTAC's decision to pursue a GSM-based system is based on its business plans and the need for technical compatibility with its roaming partners. ASTAC had been pursuing a handset-based Phase II E911 solution and had successfully sought extensions of the Commission's Section 20.18(g)(1) Phase II deadlines.²

¹ 47 C.F.R. § 20.18(i).

² 47 C.F.R. § 20.18(g)(1).

Since the release of the Commission's April 1, 2005 *Order*³, it has become apparent to ASTAC that no handset-based Phase II solutions for GSM networks are likely to become available in the near future, if ever.⁴ ASTAC is not confident that any location-capable GSM handsets will ever become available since the two major U.S. carriers utilizing GSM networks, Cingular and T-Mobile, have implemented network-based Phase II solutions, thus eliminating market demand for location-capable GSM handsets. In fact, in the *Order*, the FCC warned that "in the event that location-capable GSM handsets remain unavailable, we would expect carriers to actively explore other location technologies in order to achieve Phase II capability."⁵

³ *In re Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *E911 Phase II Deadlines for Tier III Carriers*, Order, FCC 05-79 (April 1, 2005) ("*Order*").

⁴ See *Order* at n. 304 (noting that there are no location-capable GSM handsets).

⁵ *Order* at ¶ 116.

ASTAC is now pursuing a network-based Phase II E911 solution. ASTAC believes that the newly-developed, rural-based network solution provided by GBSD Technologies, Inc. will allow it to provide Phase II E911 services over a TDMA and GSM network. Accordingly, ASTAC informs the Commission that it has switched to a network-based solution for Phase II implementation.⁶

Respectfully submitted,

**ARCTIC SLOPE TELEPHONE
ASSOCIATION COOPERATIVE, INC.**

By: _____/s/_____

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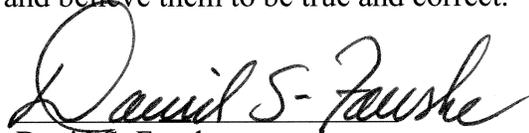
cc: Jeff Cohen, Wireless Telecommunications Bureau

⁶ ASTAC's switch to a network-based solution now subjects it to the Commission's rules in 47 C.F.R. § 20.18(f). To date, ASTAC has not received a request for Phase II E911 service from a public safety answering point (PSAP).

DECLARATION OF DAVID S. FAUSKE

I, David S. Fauske, do hereby declare under penalty of perjury the following:

1. I am the General Manager and Chief Executive Officer of Arctic Slope Telephone Association Cooperative, Inc.
2. I have read the foregoing "Report Regarding Phase II E911 Deployment of Arctic Slope Telecommunications Association Cooperative, Inc." I have personal knowledge of the facts set forth therein, and believe them to be true and correct.


David S. Fauske

June th 13 2005
Date