

**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)
)
Phase II Compliance Deadlines for Non-)
Nationwide CMRS Carriers)
)

To: The Commission

**INTERIM REPORT REGARDING E911 PHASE II DEPLOYMENT
LEACO RURAL TELEPHONE COOPERATIVE, INC.**

Leaco Rural Telephone Cooperative, Inc. (“Leaco”) hereby submits this Interim Report on E911 Phase II deployment as required by the Federal Communications Commission’s (“FCC” or “Commission”) April 1, 2005 E911 *Waiver Order*.¹ Leaco is a Tier III wireless carrier that had previously sought additional time to comply with the Commission’s E911 Phase II rules and was subject to the limited relief afforded to certain Tier III carriers by the *Stay Order*² and the *Non-Nationwide Carrier Order*.³ In the *Waiver Order*, the FCC granted temporary relief to a number of carriers, including Leaco, who had elected to pursue a handset-based solution to E911 Phase II location capability

¹ *In re 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, FCC 05-79 (April 1, 2005) (“*Waiver Order*”).

² *In re 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 (October 10, 2003) (“*Stay Order*”).

³ *In re 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 (July 26, 2002) (“*Non-Nationwide Carrier Order*”).

requirements. The Commission also required these carriers to submit an Interim Report by September 1, 2005, to provide updated information on their efforts to meet the handset deployment requirements of section 20.18(g) of the Commission's rules.⁴ What follows are Leaco's responses to the Commission's specific deployment progress inquiries (in bold) as enumerated in the *Waiver Order*⁵:

(1) The number of Phase I and Phase II requests received from Public Safety Answering Points ("PSAP"); the status of these requests; and whether the carrier and the PSAP have reached an alternative deployment schedule.

Leaco has yet to receive any requests for Phase I and/or Phase II E911 service from the PSAPs in its service area. It is Leaco's understanding, based upon its close contacts with the state of New Mexico, that it will not receive any requests for Phase I service before June 2006. Likewise, Leaco does not expect any requests for Phase II service before December 2006. Leaco expects to be capable of meeting these predicted requests when they are eventually made.

(2) The carrier's specific technology choice.

Leaco is pursuing a CDMA overlay for its Phase II solution that will be capable of utilizing automatic location identification ("ALI")-capable handsets. Leaco is working to upgrade its digital Lucent switch from TDMA to CDMA technology so that it will be compatible with mass-market ALI-capable handsets. Leaco had last reported to the Commission its expectation to be completed with this overlay by March of 2005. For a variety of reasons, this implementation has been delayed. Leaco is preparing a request for waiver, which it intends to file in the near future, which addresses in greater detail the issues related to Leaco's technology choice.

⁴ *Waiver Order* at ¶ 172.

⁵ *Waiver Order* at ¶ 172.

(3) Status on ordering and/or installing necessary network equipment.

Leaco is in the process of selecting and engaging a vendor and intends to place the necessary hardware and software orders to both overlay its network with CDMA technology and to make its network capable of delivering ALI data to requesting PSAPs by the end of this month.⁶

(4) The date on which Phase II service will first be available on the carrier's network.

Based on Leaco's current implementation schedule, Leaco expects to begin providing Phase II service by April 1, 2006.

(5)(a) Whether ALI-capable handsets are available; and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets.

It is Leaco's understanding that mass-market ALI-capable handsets are available for CDMA-based systems. Leaco has yet to obtain any ALI-capable handsets and has no agreements in place to obtain such handsets. However, as part of Leaco's network upgrade and Phase II implementation schedule, Leaco is investigating various options for ALI-capable handsets that will be capable of functioning on Leaco's upgraded network.

(5)(b) Information on the carrier's progress towards ensuring that ninety-five percent of its subscriber base has location-capable handsets.

Leaco does not expect to be able to meet the Commission's ninety-five percent penetration deadline. Leaco will soon be filing a request for waiver of this deadline that will provide more details regarding Leaco's efforts to switch its customers from TDMA and analog handsets to ALI-capable CDMA handsets.

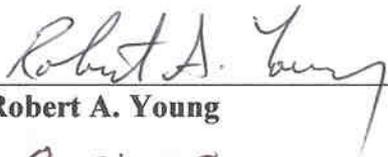
Dated: September 1, 2005

⁶ Leaco will discuss in greater detail in its request for waiver its implementation timetable.

DECLARATION OF ROBERT A. YOUNG

I, **Robert A. Young**, do hereby declare under penalty of perjury the following:

1. I am the Controller of Leaco Rural Telephone Cooperative, Inc.
2. I have read the foregoing "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.



Robert A. Young
8.31-05

Date