

CC Docket No. 94-102 – September 2005 E911 Interim Report

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Date: September 2005

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TIER III CARRIER INTERIM REPORT
September 2005
CC Docket No. 94-102

Commnet of Arizona, L.L.C. (“Commnet-AZ”) hereby submits its E911 Interim Report, pursuant to *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 No. 94-102, *Order*, 20 FCC Rcd 7709, 7771 ¶172 (2005) (“*Order*”).

Carrier Identifying Information:

Carrier Name: Commnet of Arizona, L.L.C. – FRN 0009-2912-20

E911 Compliance Officer: Petr Valkoun
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E911 Implementation Information:

Commnet-AZ is operating as a “carriers’ carrier”, *i.e.*, Commnet-AZ serves only the customers of other carriers. Thus, Commnet-AZ has no subscribers and will not have any subscribers. Based on this premise, Commnet-AZ hereby reports as follows:

- Commnet-AZ received a Phase I request from the PSAP for Pima County, AZ, and earlier this year received a Phase I request from the PSAP for Maricopa County, AZ. The Pima County PSAP has not requested Phase II E-911 from Commnet-AZ. The Maricopa County PSAP initially submitted a Phase II request with its Phase I request. However, due to the rural nature of the areas within the footprint of Comment-AZ, this PSAP has withdrawn its Phase II request and granted Commnet-AZ a waiver of Phase II until such time as Commnet-AZ can technically meet the FCC’s requirements for Phase II deployment. Commnet-AZ has not received any other Phase I or Phase II requests from any other PSAPs in its market.
- Commnet-AZ is using analog and TDMA technology at all of its cell sites, and is now in the process of adding GSM technology at each of its cell sites.^{1/} Commnet-AZ has obtained and installed all of the equipment and software for both the TDMA technology and the GSM technology (where GSM has been installed) that is necessary to meet the PSAPs’ Phase I requests. Commnet-AZ’s TDMA Phase I deployment is complete in Pima and Maricopa Counties.

Comment-AZ’s GSM Phase I deployment in these counties, however, has been delayed due to the activities of Qwest, the monopoly local exchange carrier (“LEC”) in its markets. Commnet-AZ has been working with Qwest to obtain landlines connecting the Pima County and Maricopa County PSAPs to the switch in Yuma, AZ. Qwest advised Commnet-AZ that

^{1/} Commnet-AZ also intends to add CDMA technology to its cell sites as demand from its roaming customers dictates.

it was implementing a second Selective Router at Tucson, AZ, and told Commnet-AZ to wait until installation of the second Selective Router was complete before submitting any new orders for landlines, which will utilize the second Selective Router. Qwest completed installation of its second Selective Router at the end of August, and Commnet-AZ submitted its trunk orders. Commnet-AZ anticipates that installation of the trunks for the second Selective Router will be completed within the next 30 days and Commnet-AZ can then complement deployment of its GSM Phase I E-911 in Pima and Maricopa Counties.

Commnet-AZ, with the assistance of Intrado, has been in continuous communications with the Pima County and Maricopa County PSAPs regarding the implementation of Phase I E-911 in the market. Commnet-AZ has kept the Pima County and Maricopa County PSAPs apprised of the situation with Qwest and the installation of landlines for GSM Phase I implementation, and both have expressed satisfaction with Commnet-AZ's performance respecting its GSM Phase I deployment.

- As previously reported, because Commnet-AZ has no subscribers, Commnet-AZ does not have the means to fund Phase I implementation and recurring costs via pass-throughs to subscribers. Commnet-AZ worked closely with the Pima County PSAP to submit the proper forms with the appropriate state and local government agencies and to execute a contract with the Pima County PSAP for deployment of Phase I E-911. Pima County has a cost recovery program, and Commnet-AZ prepared and submitted a statement of implementation fees and recurring costs to the Pima County government for its TDMA Phase I deployment, which was approved for cost recovery. Commnet-AZ subsequently applied for additional cost recovery for its GSM Phase I deployment, which request was approved. However, Commnet-AZ has had to revise and resubmit its request for additional cost recovery, which revised request includes the costs associated with the trunks for Qwest's second Selective Router in Tucson, AZ. Commnet-AZ anticipates that its revised cost recovery request will be approved and is expecting to receive some cost recovery for its GSM Phase I deployment in Pima County.

Similarly, Commnet-AZ is currently working with the Maricopa County PSAP to get all of the proper forms submitted to the appropriate state and local government agencies and to execute a contract with the Maricopa County PSAP for deployment of Phase I E-911 in that county. Maricopa County has a cost recovery program, and Commnet-AZ is preparing to submit a statement of implementation fees and recurring costs to the Maricopa County government for its TDMA/GSM Phase I deployment. Commnet-AZ anticipates that its cost recovery request will be approved and that it will receive some cost recovery for its TDMA/GSM Phase I deployment in Maricopa County.

- Commnet-AZ elected a handset-based Phase II E-911 solution, and continues to anticipate a significant problem with its Phase II E-911 deployment. As previously reported, Commnet-AZ has a request pending with the Commission for a waiver of the Phase II implementation deadlines. There is currently no Phase II-compliant handset-based solution available for either TDMA or GSM, and it appears that one will not become available any time in the near future. Vendor predictions of future development of GSM handsets have proven unreliable. Also, Commnet-AZ is unable to switch to a network-based solution because it is technically

impossible. The only Phase II-compliant network-based solutions available are based on either triangulation techniques -- which can work only when the network is receiving location information on the involved mobile unit from three different cell sites -- or angle of arrival techniques ("AOA") -- which can work only when the network is receiving location information from at least two different cell sites.

Phase II E-911 is not technically feasible in Commnet-AZ's unserved area market, which comprises the most rural portions of Pima and Maricopa Counties. Commnet-AZ operates only in remote, rural areas which are less densely populated and where the cell sites are spread far apart and there is little overlap between two cells, and no overlap among three cells. No portion of Commnet-AZ's service area is susceptible to triangulation techniques. There is only a stand-alone cell site in Maricopa County. Thus the service area in that county is not susceptible even to AOA techniques. Commnet-AZ would never reach a 95% accuracy level on a system-wide basis, as prescribed by §20.18(h) of the Commission's rules.

- For the reasons discussed above pertaining to the permanent absence of any available Phase II TDMA or GSM handsets and the impossibility of employing a network-based solution, both of which are beyond Commnet-AZ's control, Commnet-AZ does not anticipate that full Phase II service will be available in its network any time in the near future.
- With regard to meeting the ultimate implementation date of December 31, 2005, see above.