

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

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Date: September 2005

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By Electronic Submission:

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

Commnet Wireless, L.L.C. (“CWLLC”) 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 Wireless, L.L.C. – FRN 0007-1164-03

E911 Compliance Officer: Petr Valkoun
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E911 Implementation Information:

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

- CWLLC is operating wireless broadband PCS system in unserved areas in Arizona. CWLLC has not received any Phase I or Phase II requests from any PSAPs in its service area. CWLLC has obtained and installed all of the equipment and software necessary to meet any Phase I request it may receive from a PSAP, but will have to work with a local exchange carrier (“LEC”) to have a landline installed between the switch and a requesting PSAP for Phase I deployment when the time comes. It could take a LEC as long as 12 or even 18 months to install a new landline in the rural areas where CFC is operating.

CWLLC has no subscribers, thus CWLLC does not have the means to fund any Phase I or Phase II implementation and recurring costs via pass-throughs to subscribers. Because CWLLC has not yet received any Phase I or Phase II requests, it has not yet explored the availability of any state or local cost recovery programs for E-911 implementation.

- CWLLC has elected a handset-based solution for Phase II E-911. CWLLC is using analog and TDMA technology at all of its cell sites and has added GSM overlays to several of its cells sites, to meet the demands of its roaming customers. CWLLC continues to anticipate a significant problem with its Phase

II E-911 deployment. There is currently no Phase II-compliant handset-based solution available for TDMA or GSM technology, and it appears from all available market information that one will not become available any time in the near future.

- Moreover, CWLLC 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.

CWLLC operates only in remote, rural areas where population density is low and the cell sites are spread far apart. CWLLC’s network is composed primarily of stand-alone cell sites -- there is a slight overlap between only two of the cells and no overlap among three cells within CWLLC’s service area. Thus, only small portions of CWLLC’s service area is susceptible to either triangulation or AOA techniques; the bulk of the service area is not susceptible to such techniques. Therefore, even if CWLLC were to implement Phase II E-911, it would never be able to reach the required 95% accuracy level on a system-wide basis in any of its markets, as prescribed by §20.18 of the Commission’s rules. CWLLC has a request pending with the Commission for a permanent waiver of the Phase II requirements.

- For the reasons discussed above pertaining to the permanent absence of any available Phase II TDMA and GSM handsets and the impossibility of employing a network-based solution, both of which are beyond CWLLC’s control, CWLLC does not anticipate that full Phase II service will be available in its network any time in the near future. CWLLC is continuing to monitor the marketplace for new technology that will provide adequate Phase II E-911 service to rural markets.
- With regard to meeting the ultimate implementation date of December 31, 2005, see above.