

**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 Phase II Compliance Deadlines for)	
Tier III Carriers)	

Leaco Rural Telephone Cooperative, Inc. Supplement to Petition for Temporary Waiver of Section 20.18(g) of the Commission's Rules

Leaco Rural Telephone Cooperative, Inc. ("Leaco"), by its attorneys, hereby supplements its September 1, 2005 petition for temporary waiver¹ of Sections 20.18(g)(1)(i)-(v) of the Federal Communication Commission's ("FCC" or "Commission") Phase II E911 ("Phase II") rules.² Specifically, this supplement provides additional information regarding Leaco's Phase II implementation status and its contacts with the state of New Mexico Public Safety Answering Point ("PSAP") representative. As discussed below, Leaco remains on schedule to implement Phase II E911 in accordance with the schedule outlined in its September 1, 2005 petition.³

¹ Leaco Rural Telephone Cooperative, Inc. Petition for Temporary Waiver of Section 20.18(g) of the Commission's Rules, *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *E911 Phase II Compliance Deadlines for Tier III Carriers* (filed September 1, 2005) ("*Leaco Petition*").

² 47 C.F.R. §§ 20.18(g)(1)(i)-(v).

³ See *Leaco Petition* at 7.

I. Phase II Implementation Status

Leaco is still on track to commence its network upgrade to code division multiple access (“CDMA”)⁴ on December 1, 2005. In fact, at this time, Leaco is ahead of its aggressive schedule. Leaco has been able to come to an agreement with its switch vendor, Lucent, and the Leaco Board of Directors approved Lucent for the needed Phase II upgrades on September 20, 2005. Leaco expects to finalize the Lucent contract this week. Lucent has already created an implementation “team” for the Leaco project and has developed a schedule for the necessary work. Lucent has stated its intent to begin installing new CDMA equipment by the first week of November 2005. Leaco has also ordered some of the preliminary equipment in order to upgrade the software in its switch to facilitate the CDMA upgrade. Thus, Leaco fully expects to meet its stated December 1, 2005 goal to commence its network upgrade.

II. PSAP Contacts

As Leaco stated in its September 1, 2005 petition, its new General Manager has been working with the state E911 director and has kept the state advised on its E911 implementation II schedule.⁵ As stated in the attached Declaration of Laura Phipps, Leaco’s new General Manager, the New Mexico E911 Director has been advised of Leaco’s implementation timetable, and has indicated that the state has no problem with that timetable due to the fact that it did not expect the PSAPs in Leaco’s service area to be capable of handling Phase II data prior to the date when Leaco expects to be able to provide Phase II service. Leaco will continue to keep the state informed about its Phase II implementation progress.

⁴ The CDMA migration allows Leaco to utilize location-capable handsets as part of its Phase II solution. *See Leaco Petition* at 2.

⁵ *Leaco Petition* at 8.

III. Conclusion

Leaco continues to work diligently to meet its aggressive upgrade schedule which will make its network capable of utilizing location capable handsets well before any PSAPs in Leaco's service areas are capable of handling Phase II data. Leaco is committed to meeting or beating its remaining implementation schedule benchmarks and will work hand-in-hand with the state to deliver Phase II services to its citizens in rural New Mexico based on the schedule set forth in its September 1, 2005 petition.⁶

Respectfully submitted,

By: _____/s/_____

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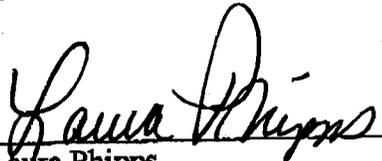
Its Attorneys

⁶ See *Leaco Petition* at 7.

DECLARATION OF LAURA PHIPPS

I, Laura Phipps, do hereby declare under penalty of perjury the following:

1. I am the General Manager of Leaco Rural Telephone Cooperative, Inc.
2. During the first week of May 2005, my first week serving as Leaco's General Manager, I contacted Art Rios, the New Mexico E911 Director, and arranged to meet with him to discuss Leaco's E911 implementation progress. During the second week of June 2005, in conjunction with a statewide E911 meeting, I met individually with Art Rios and advised him of Leaco's E911 implementation timetable. Mr. Rios indicated that the state had no problem with that timetable due to the fact that it did not expect the PSAP in Leaco's service area to be capable of handling Phase II data prior to the date when Leaco expects to be able to provide Phase II service. I have had numerous conversations and communications with the state and its consultants since that time regarding E911 issues.
2. I have read the foregoing "Supplement to Petition for Temporary Waiver of Section 20.18(g) of the Commission's Rules." I have personal knowledge of the facts set forth herein, and believe them to be true and correct.


Laura Phipps

10-18-05
Date