

## CC Docket No. 94-102 – E911 Interim Report

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**Date:** October 2005

**To:** Marlene H. Dortch, Secretary  
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**By Electronic Submission:**

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

MoCelCo, L.L.C. (“MoCelCo”) 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:** MoCelCo, L.L.C. – FRN 0005-9338-66

**E911 Compliance Officer:** Petr Valkoun  
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### **E911 Implementation Information:**

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

- ! MoCelCo received a Phase I and Phase II E-911 request simultaneously from a PSAP in Monroe County, Missouri. MoCelCo has not received any other Phase I or Phase II requests from any other PSAPs in its market. MoCelCo has been communicating with the Monroe County PSAP, in an effort to implement Phase I as expeditiously as possible. MoCelCo installed all of the equipment and software required to implement Phase I E-911 in Monroe County.

MoCelCo worked closely with the requesting PSAP coordinator to execute a contract with the Monroe County PSAP, so that Phase I implementation could move forward. MoCelCo has advised the PSAP that it is not technically feasible for MoCelCo to implement Phase II E-911 in the county, and provided the PSAP with a detailed explanation of the technical issues making Phase II impossible. The PSAP has not been and is not pursuing its Phase II request with MoCelCo. MoCelCo is maintaining contact with the PSAP coordinator and will keep her apprised of any new developments.

- ! Because MoCelCo has no subscribers, MoCelCo does not have the means of funding the Phase I or Phase II implementation fees and recurring costs via subscriber pass-throughs. Neither the State of Missouri nor Monroe County has

cost recovery programs. There are indications that the State of Missouri is contemplating implementing some type of cost recovery program in the future. MoCelCo is continuing to monitor the situation.

- ! MoCelCo elected a handset-based solution. MoCelCo is using analog and TDMA technology at all of its cells sites, and is starting to add GSM overlays at some of its cells to meet the demands of its roaming customers. MoCelCo 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, as previously reported, MoCelCo is unable to switch to a network-based solution for Phase II E-911 in its market 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.
- ! The portion of Monroe County being served by MoCelCo’s cellular system, as is the case with the rest of MoCelCo’s market, is a remote, rural area. There are only two cells in Monroe County that have an approximately 1 to 2 mile overlap, and one of the Monroe county cells overlaps a little with another cell in an adjacent county -- there is no overlap among three cells. Thus, no portion of Monroe County is susceptible to triangulation techniques, and only a minor portion of Monroe County is susceptible to AOA techniques; the bulk of Monroe County is not susceptible to any triangulation or AOA techniques. Similarly, in the rest of MoCelCo’s service area there is little overlap between two cells or among three cells. Only a minor portion of the remainder of MoCelCo’s market is susceptible to triangulation techniques. Therefore, even if Phase II E-911 were implemented, MoCelCo would never reach a 95% accuracy level on a system-wide basis, as prescribed by §20.18 of the Commission’s rules. MoCelCo 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 MoCelCo’s control, MoCelCo does not anticipate that full Phase II service will be available in its network any time in the near future. MoCelCo is continuing to monitor the marketplace for new technology that will provide adequate Phase II E-911 service to rural

markets, and is currently looking into a new network-based solution that MoCelCo just heard of which is being marketed by GBSD Technologies, Inc.

- ! With regard to meeting the ultimate implementation date of December 31, 2005, see above.