

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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| In the Matter of |) | |
| |) | |
| Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems |) | CC Docket No. 94-102 |
| |) | |
| Petitions for Waiver of Enhanced 911 Phase II Requirements |) | |

**FEBRUARY 1, 2006 QUARTERLY REPORT OF MISSOURI RSA NO. 7
LIMITED PARTNERSHIP D/B/A MID-MISSOURI CELLULAR**

By Order dated October 28, 2005^{1/}, the Federal Communications Commission (“FCC” or “Commission”) granted Missouri RSA No. 7 Limited Partnership d/b/a Mid-Missouri Cellular (“MMC”)^{2/} a waiver of the requirement in Section 20.18(g)(1)(v) of the Commission’s Rules that carriers employing handset-based E911 location technology achieve 95% penetration, among their subscribers, of location-capable handsets by December 31, 2005. By that waiver, the December 31, 2005 deadline was extended until October 28, 2006. As a condition of that waiver, the Commission required that MMC submit status reports, on a quarterly basis, commencing February 1, 2006. This filing is the requisite February 1, 2006 status update.

As required in the *Waiver Order*, the following is respectfully shown:

^{1/} *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petitions for Waiver of Enhanced 911 Phase II Requirements, Order*, CC Docket No. 94-102 (Rel. October 28, 2005). (“*Waiver Order*”)

^{2/} As the Commission is aware, MMC is a Tier III carrier that provides analog, TDMA and digital CDMA CMRS wireless service in Missouri RSA 7 - Saline [CMRS Station KNKN595 (CMA510B)]. In addition, MMC provides service to a rural portion of the Kansas City MSA through Station KNKR207 (CMA024B).

1) The number and status of Phase II PSAP requests (including those the carrier considers to be invalid).

As the Commission is aware, MMC has received only one E911 Phase II service request from a public safety answering point (PSAP). That request, a consolidated Phase I/Phase II request, was made by the Ray County 9-1-1-Center (Ray County PSAP) on October 8, 2002. MMC served a written request for documentation on the Ray County PSAP on October 14, 2002, within 15 days of receipt of the PSAP request, however, the Ray County PSAP has yet to provide that documentation. Therefore, under 47 CFR ' 20.18(j)(3), the six-month period for Phase I and Phase II implementation has been tolled until such time as the Ray County PSAP provides MMC with the requested documentation.

2) The estimated dates on which Phase II service will be available to PSAPs served by the MMC network.

The MMC CDMA network is fully capable of providing E911 Phase II service. Although the requisite interface and testing with an E911 Phase II compatible PSAP would be required, in areas where MMC offers CDMA service, this could be completed within the six month timeline allowed by the Commission's Rules, once a valid E911 Phase II request were received.

3) The status of MMC's coordination efforts with PSAPs for alternative 95 % handset penetration dates.

In the event that MMC were to find it necessary to seek any further extensions of the 95% handset penetration date, MMC would coordinate with all E911 Phase II compatible PSAPs, in advance of making any FCC filing.

4) MMC's efforts to encourage customers to upgrade to location-capable handsets.

MMC has launched an educational campaign to advise its existing analog and TDMA subscribers that those handsets are not capable of providing locational information when a 911 call is placed. MMC has also offered financial incentives for those subscribers to convert to CDMA digital calling plans and upgrade their handsets to ALI-compatible handsets.

5) The extent of subscribers located in areas with analog service only.

MMC subscribers operate in the mobile mode thereby allowing any subscriber to travel into an area where the CDMA coverage is insufficient for reliable service to a low-powered CDMA handset but where a higher-powered analog mobile is able to make or maintain a call.

6) The percentage of MMC customers with location-capable phones.

Currently, 44% of MMC's subscribers have ALI-capable handsets.

7) Detailed information as to MMC's status of achieving compliance and whether MMC is on schedule to meet the October 28, 2006 revised deadline.

At the time of filing its waiver request, approximately 24% of MMC's subscribers had ALI-capable handsets. As shown in response to item 6 above, MMC has made further progress toward the 95% legacy compatibility requirement since that time. However, as of this point in time, MMC cannot ascertain with certainty whether or not it will be able to meet that requirement by October 28, 2006. As the Commission is aware, MMC had sought a 13 month extension of that deadline until January 31, 2007; comparable to extensions the Commission has granted to other carriers. In addition, as fully addressed in the MMC waiver request, MMC is required under the FCC rules to

DECLARATION

I, Kevin Dawson, hereby declare and state as follows:

1) I am President of Missouri RSA No. 7 Limited Partnership d/b/a Mid-Missouri Cellular, a ATier III@ CMRS carrier as defined by the Federal Communications Commission;

2) That I am familiar with the facts as set forth in the foregoing Quarterly Report of Missouri RSA No. 7 Limited Partnership d/b/a Mid-Missouri Cellular with respect to its previously-granted waiver of Section 20.18(g)(1)(v) of the Commission's Rules;

3) That the statements set forth therein are true, complete and correct of my own knowledge except such statements made on information and belief, and as to such statements, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

January 27, 2006
Date

/s/ Kevin Dawson
Kevin Dawson