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February 1, 2006

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Dobson Cellular Systems, Inc.*
E911 Quarterly Report – CC Docket No. 94-102

Dear Ms. Dortch:

Dobson Cellular Systems, Inc. and its subsidiaries, by its attorneys, hereby submit the attached E911 Quarterly Report on their progress toward and compliance with the terms and conditions of the *Order to Stay* and the Commission's E911 rules.¹

If there are any questions regarding this matter, please contact the undersigned.

Sincerely,

WILKINSON BARKER KNAUER, LLP



By: Lawrence J. Movshin
Lee J. Rosen

Attachment

cc: Kris Monteith, Chief, Enforcement Bureau
Catherine W. Seidel, Acting Chief, Wireless Telecommunications Bureau
Tim Ryan, Acting Executive Director, APCO
Rob Martin, Executive Director, NENA
James R. Hobson, Counsel for NENA and NASNA
Steve Marzolf, President, NASNA

¹ See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841 (2002).

E911 Status – Quarterly Report

CC Docket No. 94-102

February 1, 2006

Summary of Report

Pursuant to the *Order to Stay* and the Commission's Public Notice dated June 6, 2003,¹ Dobson Cellular Systems, Inc.,² as a Tier II carrier, provides this E911 Quarterly Report ("Report"). The Report provides information on all Phase I and Phase II requests received by DCS, including: the PSAP ID, Name, State, County, Implementation Phase, Air Interface, Date PSAP Request Made, Date PSAP Request Withdrawn, Invalid Request, Deployed, Date Deployed, Date Projected, Reasons and Comment. Detailed information regarding the requests is contained in the attached chart.

Phase I Service

DCS has received numerous requests for Phase I services and has activated service in all but a few of these jurisdictions. DCS has worked diligently with its third-party vendor, Intrado, as well as the public safety community, in coordinating Phase I deployment. DCS remains committed to working with its vendors, the PSAPs, and state and local governments, in order to deploy Phase I services in the remaining jurisdictions as soon as possible.

Phase II Service

A. Deployment Preparation

DCS is a mid-sized carrier servicing predominantly rural and suburban markets in 11 states. DCS previously relied primarily upon a TDMA-based network of base stations and switching equipment, but has since completed overlaying its TDMA network with GSM/GPRS technology. DCS has worked with equipment vendors deploy a network-based Phase II E911 solution, and all switch upgrades necessary to supply Phase II services have been completed.

DCS has executed a contract with Andrew Corporation to provide the Position Determining Entity equipment for a hardware solution for Phase II and has also executed a contract with Polaris Wireless to provide a software solution for E911 Phase II. DCS considers a market as being E911 Phase II "deployed" after DCS has completed testing of the installed hardware and software with the PSAP to confirm that the PSAP is receiving latitude and longitude information in the appropriate format.

B. Phase II Requests

¹ See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841 (2002) ("*Order to Stay*"); See Public Notice, "Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation," DA 03-1902 (rel. June 6, 2003).

² The instant Report is filed on behalf of Dobson Cellular Systems, Inc. and its subsidiaries (collectively "DCS"). A separate report is being filed for American Cellular Corporation ("ACC"), which is an affiliate of DCS.

During the past quarter, DCS has deployed the necessary software and hardware of the network-based Phase II solution in response to pending requests. DCS received no new Phase II requests since the last quarterly filing. The status of all requests is detailed in the attachment.

On June 22, 2005, DCS completed the acquisition of licenses previously held by RFB Cellular, Inc. Debtor-in-Possession and Alpine-Michigan F, LLC Debtor-in-Possession (collectively “RFB”).³ In the process, DCS became subject to various Phase II E911 deployment requests, all of which RFB had satisfied utilizing a CDMA handset-based technology. Dobson has completed a GSM overlay of the RFB network in areas not otherwise covered by Dobson’s previously-licensed spectrum, but this GSM network is operating through a different switch located in Grand Traverse, MI. Although the transition from CDMA to GSM/GPRS is proceeding, Dobson filed for waiver of the 20.18(g)(1)(v) of the Commission’s rules on December 20, 2005 because not all of the legacy CDMA customers have ALI-compliant handsets. The waiver request remains pending.

To ensure that it may properly prioritize its E911-designated resources, DCS has generally requested each of the requesting PSAPs to provide documentation pursuant to the *Richardson* criteria.⁴ Although DCS has not yet received a response to its request from all of these PSAPs, it is proceeding in good faith to provide Phase II capabilities in all DCS counties.

C. Deployment Issues

DCS, as a rural carrier, has numerous markets that do not have the cell site density to provide accurate Phase II information via a network-based solution. DCS has recently employed a software-based solution from Polaris in the vast majority of its markets that DCS hopes will ultimately yield more reliable results in these difficult markets. However, regardless of vendor DCS may not be able to provide accuracy results that satisfy the Commission’s current view of its Phase II requirements due to cell site configuration problems, especially in markets with only one or two cell sites. As previously reported, DCS has learned from the vendor that in the Polaris-served markets, E911 Phase II service will not be available to subscribers using analog service. DCS continues to review other alternatives to provide E911 Phase II to these subscribers.

For DCS’s hardware-based solution, in order to meet the Commission’s network-based accuracy requirements, Andrew Corporation may need to install Angle-of-Arrival (“AOA”) antennas at certain cell sites in addition to the Time Difference of Arrival equipment that will be installed in individual cell sites. DCS has also been informed that installing AOA antennas may require tower modifications, lease modifications, and zoning approvals – any of which present the potential for delay.

³ In acquiring the RFB markets, DCS was not provided the specific dates of all previously received PSAP requests and, if applicable, E911 deployment dates. In the absence of having a specific date to insert into the report, DCS utilizes the placeholder date of 12/28/04 (the date DCS acquired the assets in RFB markets) to comply with formatting issues previously raised by the FCC staff.

⁴ *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced E911 Emergency Calling Systems, Petition of City of Richardson*, CC Docket No. 94-102, *Order*, 16 FCC Rcd 18982, 18986-87 (2001).

DCS brought similar matters to the Commission's attention in its original waiver request.⁵ Accordingly, if necessary, DCS may avail itself of further waiver procedures to account for the potential market-specific shortcomings a network-based solution in its rural markets may present. The Commission has indicated that it will consider such requests.⁶

As required by the *Order to Stay*, a copy of this report is being filed with the Chief of the Enforcement Bureau, the Chief of the Wireless Telecommunications Bureau, and the Executive Directors and Counsels of APCO, NENA, and NANSA.

⁵ See DCS Petition for Waiver of Sections 20.18(e), (f), and (h) of the Commission's Rules, CC Docket No. 94-102, at 11-15 (filed Sept. 4, 2001).

⁶ See *Order to Stay*, 17 FCC Rcd at 14853.

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
10	Anchorage Police Department	AK	Anchorage Borough	1	TDMA/GSM	04/28/2004		N	Y	08/17/2005			
10	Anchorage Police Department	AK	Anchorage Borough	2	TDMA/GSM	04/28/2004		N	Y	10/28/2005			
3429	Kalkaska County Central Dispatch	MI	Kalkaska	1	TDMA/GSM	04/30/2001		N	Y	04/08/2002			
3429	Kalkaska County Central Dispatch	MI	Kalkaska	2	TDMA/GSM	10/01/2004		N	Y	04/25/2005			
3459	Mason-oceana 9-1-1-Mason	MI	Mason	1	GSM	02/09/2001		N	Y	08/19/2002			
3459	Mason-Oceana 9-1-1-Mason	MI	Mason	2	GSM	1/9/03 and 9/30/2003		N	Y	04/19/2005			
3454	Manistee County Central Dispatch	MI	Manistee	1	TDMA/GSM	09/01/2000		N	Y	03/19/2002			
3487	Missaukee County Sheriffs Department	MI	Missaukee	1	TDMA/GSM	09/01/2000		N	Y	03/19/2002			
3487	Missaukee County Sheriffs Department	MI	Missaukee	2	TDMA/GSM	07/21/2005		N	Y	09/15/2005			
3493	Montmorency County Sheriffs Department	MI	Montmorency	1	GSM	06/22/2005		N	Y	10/28/2005			Dobson acquired this license on June 22, 2005. However, the predecessor-in-interest did not provide a copy of the original PSAP request so the actual request date is unknown.
3493	Montmorency County Sheriffs Department	MI	Montmorency	2	GSM	06/22/2005		N	Y	10/28/2005			
3518	Oscoda County Sheriffs Department	MI	Oscoda	1	GSM	06/22/2005		N	Y	12/14/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase I solution. Dobson acquired this license on June 22, 2005. However, the predecessor-in-interest did not provide a copy of the original PSAP request so the actual request date is unknown.
3518	Oscoda County Sheriffs Department	MI	Oscoda	2	GSM	06/22/2005		N	Y	12/14/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Dobson acquired this license on June 22, 2005. However, the predecessor-in-interest did not provide a copy of the original PSAP request so the actual request date is unknown.
3517	Osceola County Sheriffs Office	MI	Osceola	1	TDMA/GSM	09/01/2000		N	Y	04/25/2002			
3517	Osceola County Sheriffs Office	MI	Osceola	2	TDMA/GSM	06/15/2004		N	Y	04/19/2005			
3436	Lake County 9-1-1 Central Dispatch	MI	Lake	1	TDMA/GSM	09/01/2000		N	Y	04/09/2002			
3436	Lake County 9-1-1 Central Dispatch	MI	Lake	2	TDMA/GSM	10/23/2003		N	Y	04/19/2005			
3316	Antrim County Central Dispatch	MI	Antrim	1	TDMA/GSM	09/11/2001		Y	Y	10/13/2003			
3316	Antrim County Central Dispatch	MI	Antrim	2	TDMA/GSM	12/20/2004		N	Y	04/27/2005			
3344	CCE Central Dispatch-Charlevoix	MI	Charlevoix	1	TDMA/GSM	09/01/2000		N	Y	04/08/2002			
3344	CCE Central Dispatch-Charlevoix	MI	Charlevoix	2	TDMA/GSM	12/3/2003 and 6/15/04		N	Y	04/26/2005			
3442	Leelanau County Sheriffs Department	MI	Leelanau	1	TDMA/GSM	02/15/2001		N	Y	03/18/2002			
3442	Leelanau County Sheriffs Department	MI	Leelanau	2	TDMA/GSM	1/29/2004 and 6/15/04		N	Y	04/25/2005			
3587	Wexford County Central Dispatch	MI	Wexford	1	TDMA/GSM	09/01/2000		N	Y	03/19/2002			
3587	Wexford County Central Dispatch	MI	Wexford	2	TDMA/GSM	06/10/2005		N	Y	07/12/2005			
3346	CCE Central Dispatch-Emmet	MI	Emmet	1	TDMA/GSM	09/01/2000		N	Y	04/09/2002			
3346	CCE Central Dispatch-Emmet	MI	Emmet	2	TDMA/GSM	12/3/2003 and 6/15/04		N	Y	04/27/2005			
3330	Benzie County Sheriffs Department	MI	Benzie	1	TDMA/GSM	09/01/2000		N	Y	04/09/2002			
3330	Benzie County Sheriffs Department	MI	Benzie	2	TDMA/GSM	03/17/2005		N	Y	04/25/2005			
3396	Grand Traverse County Central Dispatch	MI	Grand Traverse	1	TDMA/GSM	09/01/2000		N	Y	03/18/2002			
3396	Grand Traverse County Central Dispatch	MI	Grand Traverse	2	TDMA/GSM	06/06/2005		N	Y	07/22/2005			
3415	Huron County Central Dispatch	MI	Huron	1	TDMA/GSM	09/01/2000		N	Y	02/15/2002			
3415	Huron County Central Dispatch	MI	Huron	2	TDMA/GSM	01/07/2004		N	Y	04/27/2005			
3550	Sanilac County Central Dispatch	MI	Sanilac	1	TDMA/GSM	09/01/2000		N	Y	02/22/2002			
3550	Sanilac County Central Dispatch	MI	Sanilac	2	TDMA/GSM	11/03/2003		N	Y	04/27/2005			
3572	Tuscola County Central Dispatch	MI	Tuscola	1	TDMA/GSM	09/01/2000		N	Y	02/13/2002			
3572	Tuscola County Central Dispatch	MI	Tuscola	2	TDMA/GSM	01/07/2004		N	Y	04/27/2005			
3345	CCE Central Dispatch-Cheboygan	MI	Cheboygan	1	GSM	09/01/2000		N	Y	05/26/2004			
3345	CCE Central Dispatch-Cheboygan	MI	Cheboygan	2	GSM	12/03/2003		N	Y	04/27/2005			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
3308	Alcona County Sheriffs Department	MI	Alcona	2	GSM	11/01/2003		N	Y	04/22/2005			
3317	Arenac County Central Dispatch	MI	Arenac	2	GSM	10/31/2003		N	Y	08/08/2005			
3354	Clare County Central Dispatch	MI	Clare	2	GSM	03/03/2004		N	Y	04/21/2005			
3361	Crawford Emergency Central Dispatch	MI	Crawford	2	GSM	10/23/2003		N	Y	04/27/2005			
3420	Iosco County 9-1-1	MI	Iosco	2	GSM	08/18/2003		N	Y	04/22/2005			Although the PSAP previously had requested that Dobson revert to Phase I, with the PSAP's knowledge Phase II is now operational.
3423	Isabella County Central Dispatch	MI	Isabella	2	GSM	04/21/2004		N	Y	04/20/2005			Although Dobson completed deployment of Phase II service, on July 8, 2005, Dobson reverted back to Phase I per PSAP request.
3451	Mackinac County Sheriffs Department	MI	Mackinac	1	GSM	02/15/2001		N	Y	02/02/2005			
3451	Mackinac County Sheriffs Department	MI	Mackinac	2	GSM	02/03/2004		N	Y	04/27/2005			
3461	Meceola Central Dispatch-Mecosta	MI	Mecosta	2	GSM	04/01/2004		N	Y	04/20/2005			
3542	Roscommon County Central Dispatch	MI	Roscommon	2	GSM	10/28/2003		N	Y	04/21/2005			Although Dobson has completed deployment of Phase II service, on July 29, 2005, Dobson reverted back to Phase I per PSAP request.
3495	Muskegon Central Dispatch	MI	Muskegon	2	GSM	10/13/2004		N	Y	04/20/2005			
3504	Newaygo County 9-1-1 Central Dispatch	MI	Newaygo	2	GSM	10/21/2003		N	Y	04/19/2005			
3482	Midland County Central Dispatch	MI	Midland	1	GSM	08/16/2000		N	Y	05/26/2005			
3482	Midland County Central Dispatch	MI	Midland	2	GSM	01/27/2004		N	Y	06/15/2005			
3313	Alpena County Central Dispatch	MI	Alpena	1	GSM	11/16/2004		N	Y	01/12/2005			
3313	Alpena County Central Dispatch	MI	Alpena	2	GSM	11/09/2004		N	Y	04/26/2005			
3515	Ogemaw County Sheriffs Department	MI	Ogemaw	2	GSM	01/28/2004		N	Y	09/15/2005			
3519	Otsego County 9-1-1	MI	Otsego	2	GSM	11/21/2003		N	Y	04/26/2005			
3492	Montcalm County Central Dispatch	MI	Montcalm	2	GSM	11/05/2004		N	Y	04/20/2005			
3309	Alger County Central Dispatch	MI	Alger	1	GSM	01/25/2005		N	Y	09/22/2005			
3309	Alger County Central Dispatch	MI	Alger	2	GSM	01/25/2005		N	Y	09/22/2005			
3309	Alger County Central Dispatch	MI	Alger	2	CDMA	01/25/2005		N	Y	07/28/2005			
3352	Chippewa County Central Dispatch	MI	Chippewa	1	GSM	12/28/2004		N	Y	09/22/2005			
3352	Chippewa County Central Dispatch	MI	Chippewa	2	GSM	11/03/2003		N	Y	09/22/2005			
3352	Chippewa County Central Dispatch	MI	Chippewa	2	CDMA	11/03/2003		N	Y	09/16/2004			
3449	Luce County Sheriffs Department	MI	Luce	1	GSM	12/28/2004		N	Y	09/23/2005			
3449	Luce County Sheriffs Department	MI	Luce	2	GSM	12/30/2003		N	Y	09/23/2005			
3449	Luce County Sheriffs Department	MI	Luce	2	CDMA	12/30/2003		N	Y	09/16/2004			
3365	Delta County Central Dispatch	MI	Delta	1	GSM	12/28/2004		N	Y	09/22/2005			
3365	Delta County Central Dispatch	MI	Delta	2	GSM	01/20/2004		N	Y	09/22/2005			
3365	Delta County Central Dispatch	MI	Delta	2	CDMA	01/20/2004		N	Y	12/28/2004			
3552	Schoolcraft County	MI	Schoolcraft	1	GSM	12/28/2004		N	Y	09/23/2005			
3365	Schoolcraft County	MI	Schoolcraft	2	GSM	12/28/2004		N	Y	09/23/2005			
3365	Schoolcraft County	MI	Schoolcraft	2	CDMA	12/28/2004		N	Y	12/28/2004			
3531	Presque Isle Sheriffs Department	MI	Presque Isle	2	GSM	06/14/2005		N	Y	08/01/2005			
3397	Gratiot County Central Dispatch	MI	Gratiot	2	GSM	10/14/2005		N	Y	01/12/2006			
3763	Caldwell County Sheriffs Office	MO	Caldwell	1	TDMA/GSM	07/23/2003		N	Y	10/13/2004			
3763	Caldwell County Sheriffs Office	MO	Caldwell	2	TDMA/GSM	10/25/2004		N	Y	01/23/2006			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson has tested to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format. The PSAP's CPE equipment initially did not function properly, but the PSAP fixed the problem allowing Dobson and the PSAP to finalize. However, due to the isolation of some of the cell sites from other neighboring sites, the Phase II solution continues to experience technical difficulties, and the network sometimes reverts back to Phase I when a call is made.
3785	Clinton County Sheriffs Office	MO	Clinton	1	TDMA/GSM	07/23/2003		N	Y	10/13/2004			
3785	Clinton County Sheriffs Office	MO	Clinton	2	TDMA/GSM	10/25/2004		N	Y	09/19/2005			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
3795	De Kalb County Sheriffs Office	MO	De Kalb	1	TDMA/GSM	07/23/2003		N	Y	10/13/2004			
3795	De Kalb County Sheriffs Office	MO	De Kalb	2	TDMA/GSM	10/25/2004		N	Y	09/19/2005			
3860	Maryville Police Department	MO	Nodaway	1	TDMA/GSM	08/27/2003		N	Y	08/23/2004			
3860	Maryville Police Department	MO	Nodaway	2	TDMA/GSM	07/20/2005		N	N		TBD	2	The appropriate office received a copy of the Phase II letter on July 20, 2005, at which point Dobson treated the request as valid. Dobson and PSAP attempted to deploy in September 2005, but Maryville City PSAP CPE equipment experienced technical issues with its Phase II re-bid equipment. Dobson continues to work with PSAP to deploy Phase II service.
3879	Nodaway County Sheriffs Department	MO	Nodaway	1	TDMA/GSM	01/21/2004		N	Y	08/23/2004			
3879	Nodaway County Sheriffs Department	MO	Nodaway	2	TDMA/GSM	07/20/2005		N	Y	09/26/2005			
3769	Carroll County Sheriffs Office	MO	Carroll	1	TDMA/GSM	07/29/2004		N	Y	07/15/2005			
3769	Carroll County Sheriffs Office	MO	Carroll	2	TDMA/GSM	07/29/2004		N	Y	09/26/2005			
3811	Gentry County 9-1-1	MO	Gentry	1	TDMA/GSM	04/04/2005		N	N		TBD	1	Dobson has not received the necessary LEC facilities and will install the circuits and turn on Phase I once they arrive. The PSAP has been informed in writing of these LEC issues.
3742	Atchison County 9-1-1	MO	Atchison	1	TDMA/GSM	06/14/2005		N	Y	10/27/2005			
2707	Brown County Sheriffs Office	KS	Brown	1	TDMA/GSM	03/30/2005		N	Y	01/26/2006			
6423	Bastrop County Sheriffs Office	TX	Bastrop	1	TDMA/GSM	10/12/1999		N	Y	03/18/2001			
6467	Caldwell County Sheriffs Office	TX	Caldwell	1	TDMA/GSM	10/12/1999		N	Y	03/18/2001			
6578	Fayette County Sheriffs Office	TX	Fayette	1	TDMA/GSM	10/12/1999		N	Y	03/18/2001			
6725	Lee County Sheriffs Office	TX	Lee	1	TDMA/GSM	10/12/1999		N	Y	01/15/2001			
6612	Gonzales County Sheriffs Office	TX	Gonzales	1	TDMA/GSM	10/12/1999		N	Y	01/15/2001			
6674	Jackson County Sheriffs Office	TX	Jackson	1	TDMA/GSM	10/12/1999		N	Y	01/15/2001			
6722	Lavaca County Sheriffs Office	TX	Lavaca	1	TDMA/GSM	10/12/1999		N	Y	01/15/2001			
6865	Rockdale Police Department	TX	Milam	1	TDMA/GSM	10/12/1999		N	Y	02/13/2001			
6627	Hamilton County Sheriffs Office	TX	Hamilton	1	TDMA/GSM	10/12/1999		N	Y	02/13/2001			
6575	Falls County Sheriffs Office	TX	Falls	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6587	Freestone Sheriffs Office	TX	Freestone	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6733	Limestone Sheriffs Office	TX	Limestone	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6446	Bosque County Sheriffs Office	TX	Bosque	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6649	Hill County Sheriffs Office	TX	Hill	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6498	Colorado County Sheriffs Office	TX	Colorado	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6592	Ft Bend County Sheriffs Office	TX	Fort Bend	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6757	Matagorda County Sheriffs Office	TX	Matagorda	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6993	Wharton County Sheriffs Office	TX	Wharton	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6796	Navarro County Sheriffs Department	TX	Navarro	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6796	Navarro County Sheriffs Department	TX	Navarro	2	TDMA/GSM	3/9/2005		N	Y	09/14/2005			
6572	Erath County Sheriffs Office	TX	Erath	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6572	Erath County Sheriffs Office	TX	Erath	2	TDMA/GSM	3/9/2005		N	Y	09/21/2005			
6411	Armstrong County Sheriffs Office	TX	Armstrong	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6476	Carson County Sheriffs Office	TX	Carson	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6496	Collingsworth County Sheriffs Office	TX	Collingsworth	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6547	Donley County Sheriffs Office	TX	Donley	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6817	Pampa Police Department	TX	Gray	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6628	Hansford County Sheriffs Office	TX	Hansford	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6640	Hemphill County Sheriffs Office	TX	Hemphill	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6445	Borger Police Department	TX	Hutchinson	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6735	Lipscomb County Sheriffs Office	TX	Lipscomb	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6827	Perryton Police Department	TX	Ochiltree	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6861	Roberts County Sheriffs Office	TX	Roberts	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6995	Wheeler County Sheriffs Office	TX	Wheeler	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6862	Robertson County Sheriff	TX	Robertson	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6464	Burleson County Sheriffs Office	TX	Burleson	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6726	Leon Sheriffs Office	TX	Leon	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6978	Washington County Sheriffs Department	TX	Washington	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6402	Anderson Sheriffs Office	TX	Anderson	1	TDMA/GSM	10/12/1999		N	Y	01/10/2003			
6966	Van Zandt Sheriffs Office	TX	Van Zandt	1	TDMA/GSM	10/12/1999		N	Y	01/10/2003			

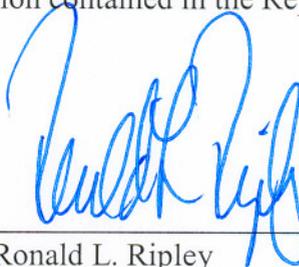
PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
6492	Coleman Police Department	TX	Coleman	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6462	Brownwood Police Department	TX	Brownwood	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6500	Comanche County Sheriffs Office	TX	Comanche	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6873	Runnels County Sheriffs Office	TX	Runnels	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6555	Eastland County Central Dispatch	TX	Eastland	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6415	Austin County Sheriffs Department	TX	Austin	1	TDMA/GSM	01/14/2002		N	Y	03/13/2003			
6415	Austin County Sheriffs Department	TX	Austin	2	TDMA/GSM	01/28/2003		N	Y	01/27/2005			Dobson is continuing to work with the PSAP to develop additional sites and improve accuracy.
6641	Henderson County Sheriffs Department	TX	Henderson	1	TDMA/GSM	01/09/2003		N	Y	08/13/2003			
6641	Henderson County Sheriffs Department	TX	Henderson	2	TDMA/GSM	07/29/2003		N	Y	12/10/2004			
6911	Somervell County Sheriffs Department	TX	Somervell	2	TDMA/GSM	03/09/2005		N	Y	09/21/2005			
3205	Allegany County Emergency Services	MD	Allegany	1	TDMA	11/21/2003		N	Y	09/22/2004			
3205	Allegany County Emergency Services	MD	Allegany	1	GSM	11/21/2003		N	Y	06/21/2005			
3205	Allegany County Emergency Services	MD	Allegany	2	TDMA/GSM	10/18/2004		N	Y	07/26/2005			
3236	Washington County Fire Rescue and Comm	MD	Washington	1	TDMA/GSM	01/30/2004		N	Y	01/11/2005			
3236	Washington County Fire Rescue and Comm	MD	Washington	2	TDMA/GSM	02/07/2005		N	Y	07/13/2005			
3223	Garrett County Fire and Rescue Communic	MD	Garrett	1	TDMA/GSM	05/05/2004		N	Y	01/18/2005			
3223	Garrett County Fire and Rescue Communic	MD	Garrett	2	TDMA/GSM	01/21/2005		N	Y	06/29/2005			
3220	Frederick County Emergency Communicatio	MD	Frederick	1	TDMA/GSM	06/03/2004		N	Y	10/20/2005			
3220	Frederick County Emergency Communicatio	MD	Frederick	2	TDMA/GSM	06/15/2004		N	Y	10/20/2005			
5887	Erie County 9-1-1 Center	PA	Erie	1	TDMA/GSM	04/12/2001		N	Y	02/06/2002			
5887	Erie County 9-1-1 Center	PA	Erie	2	TDMA	04/12/2001		N	Y	10/30/2003			
5887	Erie County 9-1-1 Center	PA	Erie	2	GSM	04/12/2001		N	Y	09/07/2005			Dobson has resolved technical issues and has installed additional sites that should improve accuracy. Dobson will be working with the PSAP to integrate these sites.
5878	Crawford County Office of Emergency Servi	PA	Crawford	1	TDMA/GSM	03/26/2002		N	Y	02/19/2003			
5031	Allegany County Sheriffs Office	NY	Allegany	1	TDMA/GSM	07/18/2002		N	Y	03/26/2003			
5031	Allegany County Sheriffs Office	NY	Allegany	2	TDMA	06/13/2003		N	Y	04/01/2004			
5031	Allegany County Sheriffs Office	NY	Allegany	2	GSM	06/13/2003		N	Y	05/25/2005			Dobson has constructed new cell sites in the county that should improve accuracy and will be working with the PSAP to integrate sites.
5048	Cattaraugus County Sheriffs Office	NY	Cattaraugus	1	TDMA/GSM	05/22/2001		N	Y	08/06/2002			
5048	Cattaraugus County Sheriffs Office	NY	Cattaraugus	2	TDMA	06/05/2002		N	Y	04/15/2004			
5048	Cattaraugus County Sheriffs Office	NY	Cattaraugus	2	GSM	06/05/2002		N	Y	05/13/2005			Dobson has constructed new cell sites in the county that should improve accuracy and will be working with the PSAP to integrate sites.
5051	Chautauqua County Sheriffs Office	NY	Chautauqua	1	TDMA/GSM	06/01/2001		N	Y	05/17/2002			
5051	Chautauqua County Sheriffs Office	NY	Chautauqua	2	TDMA	12/13/2002		N	Y	04/20/2004			
5051	Chautauqua County Sheriffs Office	NY	Chautauqua	2	GSM	12/13/2002		N	Y	05/12/2005			Dobson has constructed new cell sites in the county that should improve accuracy and will be working with the PSAP to integrate sites.
5084	Genesee County Sheriffs Office	NY	Genesee	1	TDMA/GSM	04/10/2001		N	Y	11/21/2002			
5084	Genesee County Sheriffs Office	NY	Genesee	2	TDMA	09/09/2002		N	Y	11/13/2003			
5084	Genesee County Sheriffs Office	NY	Genesee	2	GSM	09/09/2002		N	Y	05/25/2005			Dobson has constructed new cell sites in the county that should improve accuracy and will be working with the PSAP to integrate sites.
5208	Steuben County Sheriffs Office	NY	Steuben	1	TDMA/GSM	11/03/2004		N	Y	10/26/2005			
5208	Steuben County Sheriffs Office	NY	Steuben	2	TDMA/GSM	11/03/2004		N	Y	10/26/2005			
5608	Chickasha Police Department	OK	Grady	1	TDMA/GSM	9/15/2004		N	Y	3/10/2005			
5608	Chickasha Police Department	OK	Grady	2	TDMA/GSM	3/10/2005		N	Y	8/18/2005			

AFFIDAVIT OF RONALD L. RIPLEY

I, Ronald L. Ripley, do hereby declare that the following is true and accurate:

I am an officer of Dobson Cellular Systems, Inc. ("DCS").

I have reviewed the DCS E911 Quarterly Report ("Report") and to the best of my knowledge, information, or belief, all of the information contained in the Report is truthful and accurate.



Ronald L. Ripley
Senior Vice President &
General Counsel

Executed on:

JAN 31, 2006

CERTIFICATE OF SERVICE

I, LaVon E. Nickens, hereby certify that on the 1st day of February 2006, copies of the foregoing "E911 Quarterly Report" have been served by first class mail, postage prepaid to the following:

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/s/ LaVon E. Nickens
LaVon E. Nickens

* *via hand delivery*