

SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.
P.O. Box 555
Escalante, Utah 84726

Marlene H. Dortch, Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: CC Docket No. 94-102,
95 Percent ALI-Capable Handset Penetration Requirement
Rule Section 20.18(g)(1)(v).

First Quarterly Report

Dear Ms. Dortch:

South Central Utah Telephone Association, Inc. (South Central), a rural area telephone cooperative, is a small, Tier III PCS licensee, as defined in the Commission's E-911 *Order to Stay*, FCC 02-210, released July 26, 2002. South Central serves the St. George, Utah BTA on the PCS F-block spectrum (station KNLG223) and utilizes Nortel Networks' CDMA equipment for its PCS network. On October 5, 2004, South Central completed its acquisition of a partitioned portion of Qwest Wireless, LLC's E-Block PCS license for the Salt Lake City-Ogden, Utah BTA (station WQBL704). The partitioned area consists of Piute County, Utah and portions of Sevier and Wayne Counties, Utah.

There are seven Public Safety Answering Points (PSAPs) in South Central's current service area, including St. George, Utah; Panguitch, Utah; Richfield, Utah (serving Piute and Wayne Counties); Colorado City, Arizona (serving Hildale, Utah); Kanab, Utah; Cedar City, Utah; and Beaver, Utah.

By *Order (CC Docket No. 94-102)*, FCC 06-36, released March 17, 2006 (the "*Order*"), the Commission granted South Central an extension of time, up to and including March 17, 2007, within which to comply with the Rule Section 20.18(g)(1)(v) requirement that it achieve a 95 percent penetration level of ALI-capable handsets among its PCS subscribers. South Central had elected to deploy a handset-based technology in achieving compliance with the Commission's E-911 requirements. This report is submitted pursuant to the requirements of Paragraph No. 19 of the *Order*, and is as follows:

Item 1: The number and status of E-911 Phase II requests from Public Safety Answering Points ("PSAPs"), including those requests that the Filer may consider invalid: South Central has received a request to provide Phase II service to Iron County, Utah. This is the only Phase II request received to date. The request is currently in the validation phase where the PSAP is evaluating the data we have submitted. Once this has

been approved, the PSAP will submit to us the address formats of the applicable cell sites for call routing. When that process has been completed, the necessary trunks will be ordered and we will coordinate testing.

Item 2: The dates on which E-911 Phase II service has been implemented or will be available to the PSAPs served by the Filer's system: Iron County PSAP's Phase II service is expected to be implemented on or before October 4, 2006, in accordance with the Commission's Rules.

Item 3: The status of the Filer's coordination with PSAPs for alternative 95% ALI-capable handset penetration dates: To date, we have received only one request for Phase II service, namely, the one from Iron County. The Iron County PSAP is aware that we have not yet achieved 95% penetration but that we expect to do so by March 17, 2007. As we receive additional PSAP requests for Phase II service, we will likewise make them aware of our level of penetration at the time and will keep them advised of our progress in achieving 95% penetration.

Item 4: The Filer's efforts to encourage customers to upgrade to ALI-capable handsets: We continue to encourage our customers to upgrade to ALI-capable handsets. Our efforts include:

- Posting on our Internet site an explanation of location-capable handsets and the benefits of upgrading. The posting includes a list of the non-ALI-capable handsets that we sold prior to 2003 so that our customers will be able to determine whether their particular handsets need upgrading.
- Continuing to offer a discount on new handsets to customers with non-ALI-capable handsets who wish to upgrade.
- Making personal contact by telephone with customers with non-ALI-capable handsets to convince them of the benefits of upgrading. We are planning to offer new incentives in this regard.

Item 5: The percentage of the Filer's customers with ALI-capable phones: As of April 1, 2006, our level of penetration of location-capable handsets was 79.7%.

Item 6: Until the Filer satisfies the 95% penetration requirement, detailed information on the Filer's status in achieving compliance, and whether the Filer is on schedule to meet the revised, June 30, 2006, deadline: Information on our status in achieving compliance with the 95% penetration requirement is detailed in Items 1-5 above. Based on our current progress, we believe we are on schedule to meet the 95% penetration requirement by March 17, 2007.

Very truly yours,

South Central Utah Telephone Association, Inc.

By:



Brant Barton
Chief Executive Officer and
General Manager

Dated: April 27, 2006

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