

## CC Docket No. 94-102 – Status Report

**Filed by:** Keystone Wireless, L.L.C.  
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**Date:** August 1, 2006

**To:** Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**By Electronic Submission:**

Catherine W. Seidel, Acting Bureau Chief  
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**STATUS REPORT**  
**Due August 1, 2006**  
**CC Docket No. 94-102**

Keystone Wireless, L.L.C. ("Keystone") hereby submits its E911 Status Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver of Deadlines for Implementation of Phase II E911 of Key Communications, LLC and Keystone Wireless, LLC*, CC Docket No. 94-102, *Order*, 20 FCC Rcd 16927 ¶19 (2005).

**Carrier Identifying Information:**

**Carrier Name:** Keystone Wireless, L.L.C. – FRN 0007 4157 06

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**Information Regarding PSAPs:**

Keystone has not received any new PSAP requests since the submission of its May 1, 2006 Status Report. To date, Keystone had received a total of seven Phase I requests and seven Phase II requests. As of Keystone's last Status Report, Keystone was preparing to test the second installation of its Phase I deployment in Schuylkill County, and had just received Phase I/Phase II requests from three new PSAPs -- Clinton County, Montour County and Northumberland County. Keystone is now fully Phase I compliant in Schuylkill County. Keystone obtained and installed all of the network equipment and software necessary to meet the Phase I requests from the PSAPs in Center County and Lycoming County, and is actively pursuing Phase I implementation in those counties. Additionally, Keystone has obtained and installed all of the network equipment and software necessary to meet the Phase I requests from the Clinton County, Montour County and Northumberland County PSAPs, and is currently working with those PSAP's to deploy Phase I E-911 in their respective counties.

Keystone continues to update all of the requesting PSAPs on the status of its implementation of Phase II E-911, and to provide each of them with copies of all related submissions to the Federal Communications Commission. Specifically, Keystone is maintaining its tri-weekly phone calls with Kimball & Associates, which represents the PSAPs for the counties of Center, Clinton, Lycoming, Montour

and Northumberland, and its contact, through Intradocs, with the Schuylkill County PSAP. Keystone also continues to contact the Berks County PSAP director every couple of months to keep her apprised of its progress. To date, none of these PSAPs has expressed any concerns or issues respecting Keystone's Phase II E-911 implementation efforts.

### **Implementation of Phase II Service:**

As previously reported, Keystone is committed to using a network-based solution for Phase II E-911 in its market and has been exploring the network-based solutions being developed by Polaris Wireless, Inc., and GBSD Technologies, Inc. ("GBSD"), among others. Keystone has been working closely with GBSD in recent months to determine whether its Phase II solution – *i.e.*, The Compass™ Location System ("The Compass™") – is a viable option for implementing Phase II E-911 in Key's market. Additionally, Keystone has been and continues to monitor the market for new product development, but as of yet has found no new products or modifications to existing products that might potentially serve as Phase II solutions for Keystone's market.

In light of the foregoing, Keystone does not anticipate that Phase II E-911 service will be available in its network in the near future. Keystone is continuing to search out and explore other network-based Phase II solutions in the hopes of finding a viable solution for its market, and continues to aim toward a target date of December 31, 2006, for implementation of a Phase II E-911 solution within its network.

### **Construction of New Cells and Expansion of Coverage:**

Since its previous Status Report, Keystone completed construction of and is operating two new cell sites in its market.