

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
To Ensure Compatibility with)	
Enhanced 911 Emergency Calling Systems)	
)	
Phase II Compliance Deadlines for Non-)	
Nationwide CMRS Carriers)	

To: Chief, Wireless Telecommunications Bureau
Chief, Enforcement Bureau

**SunCom Wireless
QUARTERLY E911 IMPLEMENTATION REPORT
August 1, 2006**

SunCom Wireless, Inc., (“SunCom Wireless”),¹ by its attorneys, hereby submits this quarterly enhanced 911 (“E911”) report to the Federal Communications Commission (“Commission”) pursuant to the Commission’s decision to afford Tier II carriers additional time to meet their Phase II E911 obligations.² In this report, as required by the *Order to Stay*, SunCom Wireless updates the status of its E911 Phase I and Phase II deployment progress, based on data current as of July 18, 2006.³

I. STATUS OF PENDING E911 PHASE I AND PHASE II REQUESTS.

SunCom Wireless currently operates a wireless network covering approximately 18.3 million people in 31 Basic Trading Areas with wireless coverage primarily in rural and

¹ Affiliates of SunCom Wireless provide CMRS service using licenses held by Triton PCS License Company, L.L.C. and AWS License Newco, L.L.C., which are subsidiaries of SunCom Wireless.

² Revisions to the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadline for Non-Nationwide CMRS Carriers, Order to Stay, 17 FCC Rcd 14841 (2002) at ¶¶ 28-31 (hereinafter “Order to Stay”). Tier II carriers are defined as non-nationwide carriers that had over 500,000 subscribers as of year-end 2001.

³ As required in the Order to Stay, SunCom Wireless is providing this quarterly report to the Executive Directors of APCO, NENA and NASNA and their counsel.

secondary markets in the states of Virginia, North Carolina, South Carolina, Tennessee, Georgia and the Commonwealth of Puerto Rico.

SunCom Wireless continues to make significant progress in its efforts to deploy Phase I location capability services. To date, SunCom Wireless has received 191 requests for Phase I service. Of those requests, 151 are in service, 29 are from PSAPs where SunCom has no wireless coverage, and 11 are pending. For these 11 outstanding requests, the following summary outlines their status:

Current Status	Count
PSAP and SunCom Wireless mutually agree that the PSAP is not ready for various reasons, including LEC, CPE, selective router and database issues or a PSAP is simply not ready to integrate at this time or PSAP has withdrawn its request	3
Ready to deploy, mutually agreed-upon schedule in place	3
Less than six months old – in planning stages	5
Total	11

For specific details regarding these outstanding requests, including details applicable to each request that has been pending for more than six months, please refer to the Appendix to this report.

SunCom Wireless also is making significant progress towards fulfilling requests for Phase II service. To date, SunCom Wireless has received 141 Phase II requests. For the requests that came due during the preceding quarter or earlier, either: Phase II service has been deployed; the request is less than six months old and in the planning stages; or a mutually agreed-upon schedule for deployment has been arranged between SunCom Wireless and the PSAP entity.⁴ Accordingly, SunCom Wireless has met its deployment benchmark for

⁴ See Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petition of City of Richardson, Texas, Order on Reconsideration, 17 FCC Rcd 24282 (2002) at ¶ 2 (“Finally, we clarify that nothing in our rules precludes wireless carriers and PSAPs from mutually agreeing to an implementation schedule different from that prescribed by our rules.”).

the period preceding this Quarterly Report.

The attached Appendix includes information on all pending requests for Phase I and Phase II service received from individual PSAPs in the format required by the Commission and reflects deployment data current as of July 18, 2006.⁵ This Appendix lists the name of the PSAP, the date the request was received, whether or not the request is valid, and the status of the request.⁶ To the extent any request has been pending for more than six months, the Appendix lists specific reasons for the delay, steps taken to resolve the problem, and the anticipated date of full completion of the necessary work.⁷

⁵ Wireless Telecommunications Bureau Standardizes Carrier Reporting On Wireless E911 Implementation, *Public Notice*, CC Dkt. 94-102, DA 03-1902 (rel. June 6, 2003).

⁶ *Order to Stay* at ¶ 29.

⁷ *Id.*

II. ADDITIONAL QUESTIONS

Should there be any questions or if any additional information is required, please contact the undersigned.

Respectfully submitted,

SunCom Wireless, Inc.

/s/ Michele C. Farquhar

Michele C. Farquhar
David L. Martin

Its Attorneys

HOGAN AND HARTSON
COLUMBIA SQUARE
555 THIRTEENTH STREET, NW
WASHINGTON, D.C., 20004-1109
(202) 637-5663

AUGUST 1, 2006

AFFIDAVIT

I, Eric Haskell, an officer of SunCom Wireless, Inc., declare under penalty of perjury pursuant to 47 C.F.R. § 1.16 of the Federal Communications Commission's rules that to the best of my knowledge and belief the foregoing is true and correct.

/s/ Eric Haskell
Signature

EVP and CFO
Title

SunCom Wireless, Inc.

August 1, 2006

CERTIFICATE OF SERVICE

I, Gayle Hall, do hereby certify that on this 1st day of August, 2006, a copy of the foregoing SunCom Wireless, Inc. E911 Quarterly Report was served by U.S. Mail, first-class postage prepaid to the following:

Rob Martin
Executive Director
NENA
4350 North Fairfax Dr.
Suite 750
Arlington, VA 22203

Steve Marzolf
President
NASNA
VITA/Division Public Safety Commission
110 S. 7th St., Suite 135
Drawer 20
Richmond, VA 23219

Robert Gurss
Director, Legal & Government Affairs
APCO International
1725 DeSales St., N.W., Suite 808
Washington, DC 20036

Kris Monteith
Chief - Enforcement Bureau
Federal Communications Commission
445 12th Street, SW, Room 7-C485
Washington, DC 20554

John B. Newman
Executive Director
APCO International
351 N. Williamson Boulevard
Daytona Beach, FL 32114-1112

James R. Hobson
Counsel for NENA
Miller & Van Eaton, P.L.L.C.
1155 Connecticut Avenue, NW
Suite 100
Washington, DC 20036

Cathy Seidel
Acting Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW, Room 7-C485
Washington, DC 20554

/s/ Gayle Hall
