

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

In the Matter of)	
)	
Revision of the Commission's Rules)	
To Ensure Compatibility with)	
Enhanced 911 Emergency Calling Systems)	
)	CC Docket No. 94-102
Wireless E911 Phase II Implementation)	
Plan of Nextel Communications, Inc.)	
)	
Wireless E911 Phase II Implementation)	
Plan of Nextel Partners, Inc.)	
)	
Request for Waiver by Sprint Spectrum L.P.,)	
d/b/a Sprint PCS)	
_____)	

**SPRINT NEXTEL CORPORATION
E911 DEPLOYMENT STATUS REPORT
August 1, 2006**

Sprint Nextel Corporation ("SN" or "Company")¹ hereby submits additional information regarding its E911 deployment status.²

¹ Sprint Nextel Corporation is the result of a merger between Sprint Corporation ("Sprint") and Nextel Communications, Inc. ("Nextel"), which closed on August 12, 2005. On June 26, 2006, SN completed a merger with Nextel Partners, Inc. ("Partners"). The terms "Sprint," "Nextel" and "Partners" refer to those entities as they existed prior to the closing of those transactions.

² SN files this submission on a voluntary basis because the obligation set forth in the Federal Communications Commission's ("Commission" or "FCC") October 12, 2001, *Sprint Waiver Order, In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Request for Waiver by Sprint Spectrum L.P. d/b/a Sprint PCS*, Order, CC Docket 94-102, 16 FCC Rcd 18330 (2001) ("*Sprint Waiver Order*"), and the *Nextel Waiver Order, In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Wireless E911 Phase II Implementation Plan of Nextel Communications, Inc.*, Order, CC Docket No. 94-102, 16 FCC Rcd 18277 (2001) ("*Nextel Waiver Order*"), extended only through the February 1, 2006, Quarterly Report.

I. INTRODUCTION

During the second quarter of 2006, SN completed a combined 296 Phase I PSAP deployments and 306 Phase II deployments on both its Code Division Multiple Access (“CDMA”) and integrated Digital Enhanced Network (“iDEN™”) networks.³ During this time period, SN brought its total Phase I deployments to 3,705 PSAPs on its combined networks and its total Phase II deployments to 2,961 PSAPs.⁴ SN now provides Phase I and II services in portions of 46 states, Puerto Rico and the District of Columbia.

SN remains committed to providing its customers and public safety officials with E911 Phase I and II service throughout its network. SN was the first carrier to begin selling Global Position System (“GPS”) enabled handsets, the first carrier to deploy a handset based Phase II network, and the first to convert 100% of new activations on its CDMA network to GPS-enabled devices. As SN anticipated in its *Waiver Petition* filed on September 29, 2005,⁵ however, it was unable to meet the requirement that 95% of its existing customer base be GPS enabled by December 31, 2005. As discussed in the *Waiver Petition*, a latent software defect in certain Assisted Global Positioning System (“A-GPS”) handsets resulted in a malfunction of the E911 Phase II location capability in all iDEN Phase II-compliant handsets on July 17, 2004, a number

³ Appendix A and B contain specific information regarding these PSAP deployments. Because the merger with Nextel Partners was only recently completed, data from Partners has not yet been incorporated into SN’s automated databases. Appendix A reflects deployments on SN’s CDMA and iDEN networks, exclusive of Nextel Partners. Appendix B reflects the deployments on Nextel Partners’ network. Including Nextel Partners, Sprint Nextel completed 323 Phase I deployments and 336 Phase II deployments.

⁴ These numbers reflect the total unique PSAP deployments on the SN network, exclusive of Nextel Partners. Once Nextel Partners’ data is incorporated, these numbers will likely rise. If all CDMA, iDEN and Nextel Partners’ deployments are counted separately, including duplicative deployments, SN has deployed 6,034 Phase I requests and 4,680 Phase II requests.

⁵ *Sprint Nextel Corporation Request for Limited Waiver*, CC Docket No. 94-102, filed September 29, 2005 (“*Waiver Petition*”).

exceeding 4.7 million handsets.⁶ This combined with other circumstances affecting SN's conversion efforts have led SN to seek a waiver of the Commission's 95% handset deployment rule until December 31, 2007.⁷ Notwithstanding this failure, SN notes that as of December 31, 2005, it had distributed over 60 million GPS enabled handsets. SN further notes that its GPS handset penetration rate as of May 31, 2006, exceeded 86% and, if the Motorola software defect had not occurred, the penetration rate would exceed 91%.⁸

This report contains information regarding the status of SN's enhanced 911 deployment efforts through the end of the second quarter of 2006, but does not duplicate all of the information provided to the Commission in previous filings. Sprint, Nextel and Nextel Partners' previous Quarterly E911 Reports and filings in this docket provide additional information regarding the issues surrounding the deployment of Phase I and II services and SN's compliance with the Commission's rules, and those filings are incorporated herein by reference.⁹

II. CURRENT STATUS OF PHASE I AND II REQUESTS

A. Phase I Status

SN has worked cooperatively with PSAPs across the country to deploy Phase I (cell site/sector location) E911 services. As of June 30, 2006, SN is providing Phase I E911 services on its CDMA network to approximately 3,345 PSAPs, which represents the addition of approxi-

⁶ Nextel Partners experienced the same software defect on its iDEN network and also sought an extension of the FCC's December 31, 2005, deadline through December 31, 2007. *See In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket 94-102, Petition for Limited Waiver of Nextel Partners, Inc., (October 17, 2005).

⁷ *See Waiver Petition* at 6, 14-20.

⁸ These penetration rates do not include the handset penetration rates for Nextel Partners. Additional updated numbers for the end of the second quarter are pending.

⁹ *See In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket 94-102, Quarterly Reports of Sprint Corporation, Nextel Communications, Inc. and Nextel Partners, Inc. beginning February 1, 2002.

mately 195 Phase I systems from last quarter. On its iDEN network, exclusive of Nextel Partners, SN is providing Phase I E911 service to approximately 1,975 PSAPs, an addition of 101 Phase I systems during the quarter. As of June 30, 2006, Nextel Partners has deployed 714 Phase I requests, an addition of 27 Phase I systems during the quarter. These numbers represent deployments within a minimum of 3,705 unique PSAPs.¹⁰ Details regarding the status of Phase I requests on SN's CDMA and iDEN networks are contained within Appendices A and B to this report.

The "Date PSAP Made Request" column in Appendices A and B indicates the date a PSAP request was issued, even if the PSAP did not at that time meet the prerequisites of Rule 20.18. SN's objective is to deploy Phase I with as many PSAPs as possible. Accordingly, SN has not attempted to segregate those requests as valid or invalid under the prerequisites contained in Rule 20.18, but has moved forward on all requests. Where deployment is not possible within six months of a request, SN has established an agreed upon deployment schedule as permitted under the Commission's *Richardson Reconsideration Order*.¹¹ At the Commission's request, SN will provide additional information with respect to specific deployments and PSAP circumstances presented in each case.

B. Phase II Status

SN continues to deploy Phase II services to requesting PSAPs at a rapid pace. SN launched 202 new PSAPs on its CDMA network and 104 new PSAPs on its iDEN network in the last quarter bringing total CDMA deployments to 2,608 PSAPs and total iDEN deployments to 1,622 PSAPs, exclusive of Nextel Partners. Nextel Partners deployed 30 Phase II requests in the

¹⁰ The unique deployment number does not include Nextel Partners data. See footnote 4 above.

¹¹ *In the Matter of Petition of City of Richardson Texas*, Order on Reconsideration, CC Docket 94-102, FCC 02-318, (2002) at ¶29.

last quarter for a total of 450 Phase II deployments. These numbers reflect, at a minimum, 2,961 unique PSAP deployments.¹² Details regarding the status of specific Phase II requests are contained in Appendices A and B attached hereto.

As with Phase I requests, SN has not attempted to segregate Phase II requests based upon validity under the *Richardson Order*, and the Company has moved forward with implementation efforts for all requesting PSAPs. SN has reached an agreed-upon implementation schedule with each of the Phase II requesting PSAPs as permitted under the *Richardson Reconsideration Order* and accordingly, SN is in compliance with the Commission's rules regardless of the validity of a given request. Moreover, and as also discussed in previous filings, where a PSAP has made a Phase II request, and the ALI provider has not upgraded its ALI database, or prohibits the use of that ALI database contingent upon state regulatory authority approval of the ALI provider's tariff filing, the PSAP is unable to receive or utilize Phase II information. To confirm, a PSAP will be unable to receive Phase II data unless the necessary ALI and CPE upgrades have been performed.¹³

III. NETWORK READINESS

As previously advised, SN completed all necessary network upgrades by the Commission's benchmark dates. In fact, SN completed the required installation of all national platforms and upgrades to its CDMA network infrastructure ahead of the Commission's schedule. SN's CDMA network has now been Phase II enabled for more than three years.

¹² The unique deployment number does not include Nextel Partners data. See footnote 4 above.

¹³ See Sprint Reply Comments in Support of its Petition for Reconsideration and Clarification, CC Docket No. 94-102 (Jan. 28, 2002).

IV. CURRENT HANDSET ACTIVATIONS AND SALES

SN was the first carrier to effectively meet the Commission's 100% new activation requirement on its CDMA network during the third quarter of 2003.¹⁴ SN effectively met its 100% activation requirement for its iDEN network during the first quarter of 2005.¹⁵ SN has introduced more than forty GPS-enabled handset models on its CDMA network since October 1, 2001, and more than twenty-five GPS-enabled handset models on its iDEN network since October 1, 2002. Indeed, many of the early GPS handset models have been retired as obsolete. All new handset models introduced by SN are GPS enabled, and have been since January of 2003 on its CDMA network and since February 2004 on its iDEN network (the last non-GPS model introduced was a BlackBerry that is no longer available). As note above, as of the end of the fourth quarter of 2005, SN had distributed over 60 million GPS-enabled handsets.

V. COMPLIANCE WITH OUTSTANDING BENCHMARKS

SN has met all benchmarks set in the *Waiver Orders* for its CDMA and iDEN networks through the end of the fourth quarter of 2005, with the exception of the December 31, 2005, 95% handset penetration benchmark. Details of SN's activities are contained in previously filed Quarterly Reports. SN has sought a limited waiver due to its inability to meet the 95% handset penetration benchmark. As of May 31, 2006, SN's GPS handset penetration rate exceeded 86% and if the software defect had not occurred, the penetration rate would exceed 91%. SN has taken the December 2005 benchmark seriously and has devoted substantial resources to maximize its GPS handset penetration rate.

¹⁴ See Sprint Corporation Seventh Quarterly E911 Implementation Report (filed August 1, 2003) at 1-3; Sprint Corporation Eighth Quarterly E911 Implementation Report (November 1, 2003) at 2.

¹⁵ See Nextel Communications, Inc. Phase I and Phase II E911 Quarterly Report (February 1, 2005) at 11-12.

The rules provide that handset-based location solutions must provide the location of wireless 911 calls with an accuracy of 50 meters for 67 percent of calls and 150 meters for 95 percent of calls.¹⁶ Prior to deploying the assisted GPS solution on its CDMA system, SN conducted testing in conjunction with its vendors to determine whether the A-GPS system would meet FCC standards. After deploying the system, SN conducted field tests in various markets to validate that the CDMA system was operating properly. SN, using an independent third-party consultant, also completed accuracy testing prior to launching its iDEN A-GPS enabled system and met the Commission's standards. SN or its vendors also test each new GPS handset model as it is introduced into the market to ensure that it meets expected performance parameters. Based upon this information, SN believes that its current location technology satisfies the FCC's accuracy requirements regarding network performance.

Additional specific standards for testing accuracy have been completed by the Network Reliability and Interoperability Council ("NRIC") and are being further defined by the Emergency Services Interconnection Forum. SN has begun to develop the systems and processes that would meet these testing protocols and intends to conduct testing in compliance with these standards and timelines when finalized. SN further notes that the basic operational characteristics of this technology will not change based upon the amount of testing conducted.

VI. CONCLUSION

SN remains committed to E911 deployment efforts and to working with public safety in this important area.

¹⁶ 47 C.F.R. § 20.18(h)(2).

Respectfully submitted,

SPRINT NEXTEL CORPORATION

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