

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Revision of the Commission’s Rules to Ensure) CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency)
Calling Systems)
)
Petition for Enhanced 911 Phase II Waiver by)
Leaco Rural Telephone Cooperative, Inc.)

To: The Commission

**Leaco Rural Telephone Cooperative, Inc. Fourth Quarterly Handset Penetration
Status Report**

Leaco Rural Telephone Cooperative, Inc., (“Leaco”), by its attorneys and pursuant to the Federal Communication Commission’s (“FCC” or “Commission”) December 12, 2005 *Order* in the above-captioned proceeding,¹ hereby submits its fourth quarterly report on the status of its compliance with the 95 percent location-capable handset penetration requirement set forth in Section 20.18(g)(1)(v) of the Commission’s rules.²

I. Number and Status of Phase II Requests from PSAPs

Leaco received a request for Phase II enhanced 911 (“E911”) service from the Lea County public safety answering point (“PSAP”) on October 12, 2006. Leaco has received no other PSAP requests.

II. Estimated Dates When Phase II Service Will Be Available to PSAPs Served by Leaco’s Network

Leaco expects Phase II service to be available to any requesting PSAP served by Leaco within 6 months following the receipt of a valid request for service as required by Section 20.18(g)(2) of the Commission’s rules.³

¹ *In re Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Petition for Enhanced 911 Phase II Waiver by Leaco Rural Telephone Cooperative, Inc.*, Order, FCC 05-210 (December 12, 2005) (“*Order*”).

² 47 C.F.R. § 20.18(g)(1)(v).

³ 47 C.F.R. § 20.18(g)(2).

III. Status of Leaco's Coordination Efforts with PSAPs and the State of New Mexico

Leaco remains in contact with its local PSAPs and the State of New Mexico in the State's efforts to help coordinate and implement both Phase I and Phase II E911 capabilities throughout the state. Leaco participates in monthly conference calls with Lea County public safety officials regarding Leaco's Phase II implementation status and the county's Phase II upgrade efforts.

IV. Efforts to Encourage Customers to Upgrade to Location-Capable Handsets

As Leaco reported in its initial January 31, 2006 status report, Leaco is pursuing an aggressive marketing plan to encourage its customers to upgrade to CDMA-based, location-capable handsets. As Leaco outlined in its initial status report, this plan includes free antennas for customers holding onto their old, analog "bag phones," and promotions such as 30-days free service and free features. Leaco's extensive plan, as discussed in its January 31, 2006 status report, remains in place.

V. Extent of Subscribers with Analog Service Only

Based upon information from Leaco's mobile switch, Leaco estimates that approximately 1,300 of its customers are using analog-only handsets. Leaco currently serves approximately 4,500 customers in rural New Mexico. Leaco cannot determine the percentage of its analog-only customers that utilize service in areas where there is only analog service.

VI. Information on Leaco's Implementation Status and Percentage of Customers with Location-Capable Handsets

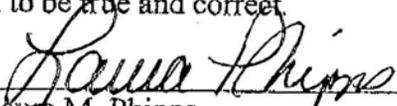
Leaco is making progress toward reaching the Commission's 95 percent benchmark. As discussed in Leaco's Second Supplement and Amendment to Petition for Temporary Waiver of Section 20.18(g) of the Commission's Rules, filed with the Commission on June 12, 2006, Leaco began selling *only* location-capable handsets on September 15, 2006 as it converted its network from TDMA to CDMA. To date, 2 percent of Leaco's subscribers have location-capable handsets. Leaco expects this percentage to increase dramatically as it markets its CDMA service and location-capable handsets. However, Leaco does not expect to be able to meet the Commission's December 12, 2006 deadline⁴ for achieving 95 percent penetration of location-capable handsets and will be requesting an extension of that deadline in the near future.

⁴ Order at ¶ 21.

DECLARATION OF LAURA M. PHIPPS

I, Laura M. Phipps, do hereby declare under penalty of perjury, the following:

1. I am the General Manager of Leaco Rural Telephone Cooperative, Inc.
2. I have read the foregoing "Leaco Rural Telephone Cooperative, Inc. Fourth Quarterly Handset Penetration Status Report." I have personal knowledge of the facts set forth herein, and believe them to be true and correct.



Laura M. Phipps

10/30/06

Date