

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

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

To: Wireless Telecommunications Bureau

**SUPPLEMENT TO REQUEST FOR ADDITIONAL LIMITED WAIVER
AND EXTENSION OF THE HANDSET PENETRATION DEADLINE
OF THE COMMISSION'S PHASE II E911 RULES**

Illinois Valley Cellular RSA 2-I Partnership, Illinois Valley Cellular RSA 2-II Partnership and Illinois Valley Cellular RSA 2-III Partnership (collectively "Illinois Valley Cellular"), by its attorneys and pursuant to 47 C.F.R. §1.925, hereby supplements its request for an additional limited waiver and extension of time to comply with Section 20.18(g)(1)(v) of the Commission's rules regarding Phase II of Enhanced 911 ("E911") services, 47 C.F.R. §20.18(g)(1)(v) to achieve a location-capable handset penetration rate among subscribers of at least 95%.¹

As a result of marketing efforts to encourage subscribers to upgrade their handsets, along with activation of new CDMA-only cell sites, Illinois Valley Cellular has attained a penetration level exceeding 95%. A penetration rate of 95.1% was achieved on December 12, 2006. As of this date the rate has risen to 95.3%

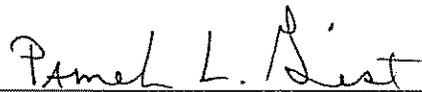
¹ On October 18, 2006 Illinois Valley Cellular submitted a request for extension of its deadline from October 28, 2006 until April 28, 2007 to achieve the requirement set forth in *Revision of Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling System*, CC Docket 94-102, Order To Stay (released July 26, 2002).

Illinois Valley Cellular will continue to improve its CDMA network and to market and activate only handsets with Phase II E911 capabilities. Illinois Valley Cellular just completed installation of a new CDMA switch, yet it will continue in the near term to serve TDMA and analog subscribers. The analog network certainly will continue to operate until February 18, 2008.

Illinois Valley Cellular set forth in its underlying request circumstances justifying a further limited waiver and extension of the 95% penetration requirement past the deadline of October 28, 2006. The public interest benefit continues to equal or exceed that which the Commission has found in other instances to be sufficient for waiver, and the request meets the standards of the *Enhance 911 Act*. Therefore Illinois Valley Cellular requests that a limited waiver and extension of Section 20.18(g)(1)(v) of FCC Rules be granted at least through December 12, 2006.

Respectfully submitted,

**Illinois Valley Cellular RSA 2-I Partnership,
Illinois Valley Cellular RSA 2-II Partnership and
Illinois Valley Cellular RSA 2-III Partnership**



David L. Nace
Pamela L. Gist

Its Attorneys

Lukas, Nace, Gutierrez & Sachs, Chartered
1650 Tysons Boulevard, Suite 1500
McLean, Virginia 22102
(703) 584-8678

December 19, 2006

12/19/06 Billing File

Analog	584	1.42%
TDMA	496	1.20%
CDMA Non-GPS	748	1.81%
CDMA GPS	39,285	95.30%
Unknown	108	0.26%
	41,221	100.00%

12/12/06 Billing File

Analog	599	1.45%
TDMA	529	1.28%
CDMA Non-GPS	788	1.91%
CDMA GPS	39,204	95.10%
Unknown	105	0.25%
	41,225	100.00%

12/5/06 Billing File

Analog	611	1.48%
TDMA	553	1.34%
CDMA Non-GPS	819	1.99%
CDMA GPS	39,133	94.94%
Unknown	102	0.25%
	41,218	100.00%

11/27/06 Billing File

Analog	631	1.53%
TDMA	589	1.43%
CDMA Non-GPS	866	2.10%
CDMA GPS	39,071	94.69%
Unknown	103	0.25%
	41,260	100.00%

11/14/06 Billing File

Analog	716	1.74%
TDMA	670	1.63%
CDMA Non-GPS	943	2.29%
CDMA GPS	38,671	94.08%
Unknown	104	0.25%
	41,104	100.00%

11/7/06 Billing File

Analog	711	1.72%
TDMA	702	1.69%
CDMA Non-GPS	976	2.35%
CDMA GPS	38,913	93.89%
Unknown	142	0.34%
	41,444	100.00%

10/31/06 Billing File

Analog	737	1.77%
TDMA	752	1.81%
CDMA Non-GPS	1,049	2.53%
CDMA GPS	38,864	93.56%
Unknown	137	0.33%
	41,539	100.00%

10/24/06 Billing File

Analog	764	1.84%
TDMA	817	1.96%
CDMA Non-GPS	1,130	2.72%
CDMA GPS	38,645	92.94%
Unknown	226	0.54%
	41,582	100.00%

10/18/06 Billing File

Analog	765	1.84%
TDMA	903	2.17%
CDMA Non-GPS	1,185	2.85%
CDMA GPS	38,156	91.64%
Unknown	630	1.51%
	41,639	100.00%

10/9/06 Billing File

Analog	752	1.80%
TDMA	919	2.21%
CDMA Non-GPS	1,191	2.86%
CDMA GPS	37,965	91.11%
Unknown	844	2.03%
	41,671	100.00%

8/15/06 Billing File

Analog	856	2.04%
TDMA	1,037	2.47%
CDMA Non GPS	1,379	3.28%
CDMA	37,654	89.63%
Unknown	1,083	2.58%
	42,009	100.00%

9/19/06 Billing File

Analog	815	1.95%
TDMA	971	2.32%
CDMA Non-GPS	1,340	3.21%
CDMA GPS	37,629	90.05%
Unknown	1,033	2.47%
	41,788	100.00%

4/5/06 Billing File

Analog	1,053	2.45%
TDMA	1,431	3.33%
CDMA Non-GPS	2,006	4.67%
CDMA GPS	37,051	86.22%
Unknown	1,434	3.34%
	42,975	100.00%

7/10/06 Billing File

Analog	908	2.15%
TDMA	1,129	2.67%
CDMA Non-GPS	1,586	3.75%
CDMA GPS	37,475	88.66%
Unknown	1,169	2.77%
	42,267	100.00%

DECLARATION

I, Tom Walsh, hereby state and declare:

1. I am Manager of Illinois Valley Cellular RSA 2-I Partnership, Illinois Valley Cellular RSA 2-II Partnership and Illinois Valley Cellular RSA 2-III Partnership (collectively "Illinois Valley Cellular"), wireless telecommunications services operators and the joint Petitioner herein.

2. I am familiar with the facts contained in the foregoing "Supplement to Request For Additional Limited Waiver And Extension Of The Handset Penetration Deadline Of The Commission's Phase II E911 Rules" and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 19th day of December, 2006.



Tom Walsh
Manager