

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 E911 Emergency)
Calling Systems)

To: The Commission

STATUS REPORT
BLANCA TELEPHONE COMPANY.

Blanca Telephone Company, by its attorney, (Reporter), pursuant to the Commission's March 15, 2006, *Order*, FCC 06-32, ¶ 20, hereby submits a status report regarding the 95% location capable handset penetration requirement. In support whereof, the following is respectfully submitted:

(1) The number and status of Phase II requests from PSAPs (including those requests it may consider invalid): Reporter has not received any requests for Phase II location service from any entity.

(2) The dates on which Phase II service has been implemented or will be available to PSAPs served by its network: Reporter will install the necessary system upgrades within 6 months of a *bona fide* PSAP request for Phase II service as required by 47 C.F.R. § 20.18(g)(2).

(3) The status of Blanca's coordination efforts with PSAPs for alternative 95% handset penetration dates: The PSAPs in the rural area served by Reporter are severely limited by budgetary constraints and they are unable even to consider installing the necessary infrastructure needed to process Phase II service information. It appears to

Reporter that the PSAPs do not have an interest in Reporter's effort to reach the 95% subscriber penetration level at this time.

(4) Blanca's efforts to encourage customers to upgrade to location capable handsets: Reporter provides service to approximately 492 subscriber cell phones in a very sparsely populated, mountainous areas of Colorado. Since the June 2006 subscriber billing cycle Reporter has included a bill insert highlighting the benefits of a location capable handset to try to encourage people to upgrade handsets, especially those with digital phones. However, Reporter has encountered continued subscriber reluctance to convert from analog handsets to location capable digital phones because of their reduced coverage area for digital phones. Unlike larger carriers, however, Reporter is unable to offer free service or discounts to try to upgrade subscriber accounts. With only 490ish subscriber cell phones every customer is important and such programs are simply not possible.

(5) The percentage of Blanca's customers with location-capable phones: Reporter indicates that its penetration level is now 44.00%, compared to 43.45% reported in the October 31, 2006, *Status Report*, compared to 43.09% reported in the July 31, 2006, *Status Report*, compared to 40.3% reported in the May 1, 2006, *Status Report*, and compared to the 35% reported when seeking an extension of the 95% penetration requirement. See March 15, 2006, *Order*, FCC 06-32, ¶ 13.

(6) Detailed discussion about the efforts made to achieve compliance and whether Blanca is on schedule to meet the March 15, 2007, extended 95% penetration deadline: Reporter remains doubtful that it will achieve the 95% subscriber penetration level by the March 15, 2007 deadline because approximately 20% of its subscriber base utilizes analog "bag" phones. Digital service in portions of Reporter's service area is not available from any carrier, including Reporter. The location capable digital phones do not have the

reception range of analog “bag” phones used by many of Reporter’s subscribers. This is due to the range loss suffered by digital phones generally, a loss which is most likely exacerbated by the fact that the area is located in a very rugged, mountainous area with many valleys. Because digital service is not available to these subscribers, it is Reporter’s estimation that they will not switch to a digital handset because no service would be available. Given the sparseness of the population, i.e., the potential subscriber base is quite small, it is not possible for Reporter to construct additional cell sites to expand its digital service area. Moreover, the general economic conditions of the subscriber area should be noted and will likely be interesting to persons used to living in a more populated area: many of Reporter’s subscribers do not have electricity, landline phone service, or running water, some have dirt floors in their dwellings, Reporter is aware that at least one subscriber lives in a railroad boxcar and another subscriber’s house was blown down by a non-tornadic wind. The nature of the subscriber base, and the potential for revenue which can be derived from it, precludes Reporter from charging rates which would make such improvements possible.

Respectfully submitted,
BLANCA TELEPHONE COMPANY
Timothy E. Welch
Hill & Welch
1330 New Hampshire Ave., N.W. #113
Washington, D.C. 20036
202-775-0070[9026] [FAX]

January 31, 2007