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February 1, 2007

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

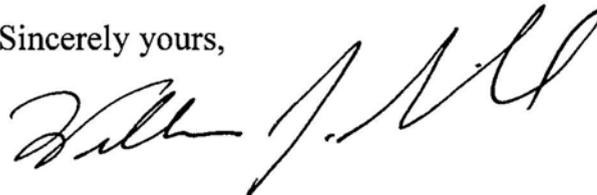
Re: *Eastern Sub-RSA Limited Partnership Quarterly E911 Status Report
CC Docket No. 94-102*

Dear Ms Dortch:

Pursuant to the Commission's *Order* in the above reference proceeding,¹ Eastern Sub-RSA Limited Partnership ("ESRLP") hereby submits its E911 status report ("Report"). This Report provides the Commission with the current status of ESRLP's progress towards compliance with the 95% handset penetration requirement set forth in Section 20.18(g)(1)(v) of the Commission's Rules.² As detailed further in the Report, ESRLP continues to meet the 95% ALI-capable handset penetration requirement.

Please contact the undersigned if you should have any questions regarding this Report.

Sincerely yours,



William J. Sill

¹ See *In the Matter of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order*, FCC 06-25 (rel. Mar. 8, 2006); see also Request for Limited Waiver of Eastern Sub-RSA Limited Partnership, CC Docket No. 94-102 (filed Dec. 5, 2005).

² See 47 C.F.R. § 20.18(g)(1)(v).

Before the
Federal Communications Commission
Washington, DC 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)
)

To: The Commission

**EASTERN SUB-RSA LIMITED PARTNERSHIP'S QUARTERLY HANDSET
PENETRATION STATUS REPORT**

Eastern Sub-RSA Limited Partnership ("ESRLP"), by its attorneys, and pursuant to the Commission's March 8, 2006 *Order* in the above captioned proceeding¹ was granted a limited waiver of the 95% handset penetration rate for its subscribers until October 31, 2006, and was required to file quarterly reports ("Quarterly Report") during the extension period.² ESRLP hereby submits its status report regarding its compliance with the 95% handset penetration requirement set forth in Section 20.18(g)(1)(v) of the Commission's Rules.³

ESRLP offers its subscribers the flexibility to subscribe to either its pre-paid program or post-paid program. Under the former, a subscriber purchases a specified dollar amount of service prior to utilizing the service and in the latter, a subscriber is billed on a monthly basis after service has been rendered. This Quarterly Report includes data and information from both programs.

I. Number and Status of Phase II Requests From PSAPs

ESRLP provides cellular service on the B2 portion of the Block B frequencies in the Washington 5 – Kittitas RSA (Call Sign KNKQ283). All of the PSAPs in ESRLP's submarket have requested and have been provided with Phase II service.

¹ See *In the Matter of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order*, FCC 06-25 (rel. Mar. 8, 2006) ("Order"); see also Request for Limited Waiver of Eastern Sub-RSA Limited Partnership, CC Docket No. 94-102 (filed Dec. 5, 2005).

² See *Order*, FCC 06-25 at ¶¶ 15-17.

³ See 47 C.F.R. § 20.18(g)(1)(v).

II. Dates On Which Phase II Service Has Been Implemented/Estimated Dates On Which Phase II Service Will Be Available to PSAPs Served by Its Network

Phase II service has been implemented for the following PSAPs:

<u>PSAP Name</u>	<u>Implementation Date</u>
Grant County, Washington	May 2005
Lincoln County, Washington	May 2005
Adams County, Washington	May 2005

III. Status of Coordination Efforts with PSAPs for Alternative 95% Handset Penetration Rates

As discussed in Section V *infra*, ESRLP continues to exceed 95% ALI-capable handset penetration rate. Furthermore, ESRLP will shortly inform the PSAPs listed above of this fact.

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

As discussed in Section V *infra*, ESRLP continues to exceed the 95% ALI-capable handset penetration rate. ESRLP efforts to convince customers to switch to ALI-capable handsets have been successful and ESRLP will continue to reach-out to those customers who have not yet switched to an ALI-capable handset using the methods described in our August 2006 E911 Status Report.

V. Percentage of Customers with Location Capable Phones

In ESRLP's November 2006 Quarterly Report, ESRLP reported that it had successfully met the 95% ALI-capable handset penetration rate. As of the date of the instant filing, 97.3% of ESRLP's customers have upgraded to ALI-capable handsets.

VI. Detailed Information on the Status in Achieving Compliance

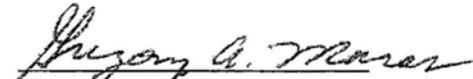
As discussed in Section V *supra*, ESRLP continues to meet the 95% ALI-capable handset penetration rate.

DECLARATION OF GREGORY A. MARAS

I, Gregory A. Maras, do hereby declare under penalty of perjury the following is true and correct:

1. I am the Secretary of Inland Cellular Telephone Company, General Partner of Eastern Sub-RSA Limited Partnership.
2. I have reviewed the foregoing Quarterly Handset Penetration Status Report and believe it to be true and correct to the best of my knowledge, information and belief.

This declaration is executed on this 1st day of February, 2007.



Gregory A. Maras
Secretary of General Partner
Inland Cellular Telephone Company