

**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. 2007 Second 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 second quarterly report of 2007 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 and a request for Phase II E911 from Chaves County PSAP on January 12, 2007. 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 has been working closely with the Lea County PSAP and the parties have agreed to a modified implementation schedule, pursuant to which Leaco will finish implementation of Phase II service to the Lea County PSAP by June 30, 2007. Leaco is currently working with the Chaves County PSAP to develop a mutually agreed upon Phase II implementation schedule. Leaco expects Phase II service to be available to other requesting PSAPs served by Leaco within

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).

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

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.

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

Leaco continues to pursue an aggressive marketing plan to encourage its customers to upgrade to CDMA-based, location-capable handsets. As previously reported, this plan includes 1) calling plans that are geared toward and offered only to customers who purchase CDMA, location-capable handsets; 2) offering 30-days free monthly service and other free features, such as voice mail and caller ID, to customers that upgrade to CDMA service; 3) the testing of boost kits that are designed for CDMA phones for oil workers and other users of analog "bag" phones that are located in remote areas; and 4) other aggressive marketing plans and customer contact initiatives as outlined in Leaco's December 12, 2006 Petition for Waiver.

V. Extent of Subscribers with Analog Service Only

Based upon information from Leaco's mobile switch, Leaco estimates that less than twenty percent of its customers are using analog-only handsets. Leaco currently serves approximately 4,200 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

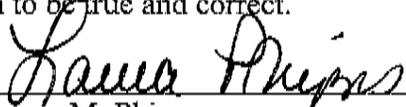
As Leaco discussed in 2007 First Quarterly Handset Penetration Status Report, Leaco's conversion to CDMA has speeded progress toward reaching the Commission's 95 percent benchmark. To date, 55 percent of Leaco's subscribers have location-capable handsets. Leaco remains on pace to meet the Commission's 95 percent benchmark by September 12, 2007.

³ 47 C.F.R. § 20.18(g)(2).

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. 2007 Second 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

4-30-07

Date