

**CALIFORNIA RSA NO. 3 LIMITED PARTNERSHIP
D/B/A
GOLDEN STATE CELLULAR**

E911 REPORT

MAY 1, 2007

The following information is submitted in accordance with FCC directive:

1. The number and status of Phase II requests from Public Safety Answering Points

Five PSAPs are located within Golden State Cellular's service area. They are: Alpine, Mariposa, Tuolumne, Amador and Calaveras Counties. The California Highway Patrol coordinates all PSAP requests for Phase II services because all E911 calls are routed to either the California Highway Patrol or to the Yosemite National Patrol. Golden State Cellular has received from the California Highway Patrol a request to provide Phase II services to all five PSAP areas.

The California Highway Patrol is capable of receiving and utilizing Phase II data. Golden State Cellular utilizes the services of Telecomsys to install and test all equipment necessary to transmit E911 data to the California Highway Patrol. Telecomsys operates the location database and optimizes E911 performance on Golden State Cellular's CDMA network system. Calls in the Yosemite National Park are routed through the Yosemite National Patrol. The Yosemite National Patrol has not yet requested Phase II service, and none has been deployed in the Park.

2. The estimated dates on which Phase II service will be available to PSAPs served by Golden State Cellular's wireless network

Golden State Cellular began providing Phase II services to the California Highway Patrol on October 6, 2006, as agreed to by the Sacramento, California regional wireless coordinator.

3. The status of coordination efforts with PSAPs for alternative 95% handset penetration dates

Golden State Cellular is actively working with PSAP officials with regard to the carrier's progress in achieving a higher location-capable handset penetration rate. Jan Opie, Product Development Manager for Golden State Cellular, stays in regular contact with the Wireless E911/GIS Project Coordinator for the E911 Emergency Communications Office, Department of General Services of the State of California. Ms. Opie keeps the Coordinator's Office informed of Golden State Cellular's penetration rate and Phase II deployment matters. Ms. Opie's communications concerning wireless E911 matters are sent to Donna Pena and to Jim Thompson of the California Statewide Wireless E9-1-1 Coordination Office.

4. Efforts to encourage customers to upgrade to location-capable handsets

Golden State Cellular notifies customers by means of phone calls, direct mail, billing inserts, print advertising and website postings that by upgrading their handsets they will have the ability to automatically transmit their location information to emergency officials when they call 911. Golden State Cellular has mailed free location-capable phones to customers asking them to adopt the new

phones as replacement for their non-location-capable phones. Each phone is pre-programmed with the recipient customer's phone number. The customer calls in and Golden State Cellular instantly performs the ESN change and activates the new phone. Golden State Cellular's customer service representatives have been contacting individually all subscribers who are reticent to release their older, non-location capable handsets. The customers are called on the telephone and urged to upgrade their devices and take advantage of the safety and service offerings provided by new phones.

Promotional campaigns encourage handset upgrades via print ads and billing inserts and phone calls to customers. Special offers are promoted on Golden State Cellular's web site and by signage on premises. The ads emphasize the benefit of early renewal for analog customers who trade in their old handsets and the safety and coverage advantages of the CDMA system. The campaigns offer free phone upgrades and discounts. Promotions for phones with cameras, ringtones, color screens and other features also help entice customers to upgrade their handsets.

Golden State Cellular's compliance efforts compare well with the efforts of other Tier III carriers. Free location-capable handsets have been offered in numerous models with a variety of added incentives. Camera phones such as the Motorola V625 and Nokia 6235i are offered free with a two-year contract. Like Washington RSA No. 8 Limited Partnership, Golden State Cellular has offered 500 free anywhere/anytime minutes to subscribers who upgrade their handsets with a two-

year contract. Golden State Cellular has offered a \$50 credit to accommodate the expenses of a trade-in. It has offered a Nokia for \$40 with no contract and with free roaming and free long distance. It has offered the LG 4400 for \$40 in a “buy one - get two free,” promotions along with 5000 free minutes and no contract. Golden State Cellular has sought to increase the penetration rate by offering phones to be added to an existing account for as low as \$10 with 500 free minutes and free texting with a two-year contract. These promotions invite the customer to ask about no contract pricing.

Like Puerto Rico Telephone Company, Golden State Cellular has called customers personally to inform them of the need to upgrade their handsets and to explain the options for free phones and free minutes, with a new contract or without a new contract. Like ACS Wireless, Inc., Golden State Cellular has used billing inserts and has visited business customers to address their concerns with handset conversion. Like Great Lakes of Iowa, Inc., Golden State Cellular has personally spoken with and invited customers to upgrade their phones without requiring an extension of the existing contract. Like Sagebrush Cellular, Inc., Golden State Cellular has aggressively built out its digital coverage area to reduce the geographical area served by only an analog signal. Golden State Cellular’s most unique compliance technique is the direct mailing of free location-capable handsets to customers with the person’s own phone number already programmed into the phone.

Golden State Cellular has chosen its methods of compliance efforts as a means of reaching the individual subscriber who still uses an analog or other non-location capable handset. General promotional efforts increase the pool of customers and the penetration rate. As it approaches the 95% benchmark Golden State Cellular's primary goal is to target customers known to have outdated handsets. Thus it contacts them directly, and sends new, free phones to their doorstep.

5. The extent of subscribers located in areas with analog service only

About three of Golden State Cellular's customers, representing 0.01% of subscribers, reside in areas served by analog signal only. This number has been reduced from the 1.2% last reported, due to the extension of the CDMA signal from new facilities at Mt. Lewis, Martell and Crane Flat. In March 2007 about 1.82% of all minutes of use occurred on the analog signal, and 2.33% of calls were placed on the analog system. A map of Golden State Cellular's CDMA coverage area is attached. Also attached is a separate map of the area covered by analog signal only.

Golden State Cellular plans to build six to eight new CDMA cell sites in 2007. It will continue to overlay the CDMA network signal on existing analog facilities, all of which are located in sparsely populated areas at elevations that receive significant snowfall each winter. Five of Golden State Cellular's forty-five sites are analog only. None of the five sites can be accessed in the winter without a helicopter or a snow cat. Three of the sites are solar powered with capacity for

either analog or digital equipment, but not both. Golden State Cellular plans to add digital service to three of the sites this summer.

The number of calls made in March 2007 on sites utilizing analog signal only was 5,699, representing 0.10% of total calls placed on the cellular system. The minutes of use on analog only sites in March 2007 was 5,690 minutes, representing 0.06% of the total minutes of use on the cellular system.

6. The percentage of customers with location-capable phones

At this time, 94.81% of Golden State Cellular's subscribers are using Phase II location-capable handsets. The percentage rate has risen almost two full percentage points over the last three months.

7. Status in achieving compliance and whether Golden State Cellular is on schedule to meet its revised deadline of 6/15/07

Even though it maintains a vigorous policy of selling and activating location-capable digital handsets and expanding the CDMA network, Golden State Cellular has not achieved the 95% penetration benchmark. On November 29, 2006 Golden State Cellular submitted to the FCC a request for additional limited waiver and extension of the deadline, until June 15, 2007. On March 9, 2007 the FCC released an *Order* in CC Docket No. 94-102, FCC 07-1217, granting Golden State Cellular an additional waiver and limited extension of the deadline to June 15, 2007.

Golden State Cellular is within 0.19% of reaching 95.00%. Measurements have been taken weekly throughout 2006 and 2007. Over the past three months, an average 74 location-capable phones were added to the system per week. Over the past four weeks, the penetration rate increased by an average 0.064% per week. At this rate, Golden State Cellular should reach 95% in about three weeks. Golden State Cellular is certain that it will meet its compliance deadline of June 15, 2007.



