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May 1, 2007

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

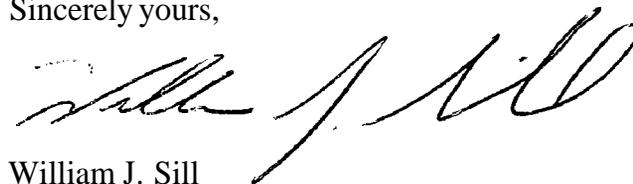
**Re:** *Eastern Sub-RSA Limited Partnership Quarterly E911 Status Report  
CC Docket No. 94-102*

Dear Ms Dortch:

Pursuant to the Commission's *Order* in the above reference proceeding,<sup>1</sup> 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.<sup>2</sup> 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

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<sup>1</sup> 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).

<sup>2</sup> 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 proceeding<sup>1</sup> 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.<sup>2</sup> 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.<sup>3</sup>

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 11 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.

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<sup>1</sup> 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).

<sup>2</sup> See *Order*, FCC 06-25 at ¶¶ 15-17.

<sup>3</sup> 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** first exceeded the 95% ALI-capable handset penetration rate on August 1, 2006.

## **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 **ES** 11 Status Report.

## **V. Percentage of Customers with Location Capable Phones**

As of the date of the instant filing, **97.8%** 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** has successfully met 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 27<sup>th</sup> day of April, 2007.



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