

# LUKAS, NACE, GUTIERREZ & SACHS

CHARTERED

1650 TYSONS BOULEVARD, SUITE 1500  
MCLEAN, VIRGINIA 22102  
703 584 8678 • 703 584 8696 FAX

WWW.FCCLAW.COM

**DOCKET FILE**  
RUSSELL D. LUKAS  
DAVID L. NACE  
THOMAS GUTIERREZ\*  
ELIZABETH R. SACHS\*  
GEORGE L. LYON, JR.  
PAMELA L. GIST  
DAVID A. LAFURIA  
B. LYNN F. RATNAVALE\*  
TODD SLAMOWITZ\*  
STEVEN M. CHERNOFF\*

CONSULTING ENGINEERS  
ALI KUZEHKANANI  
LEILA REZANAVAZ  
OF COUNSEL  
JOHN J. MCAVOY\*  
J.K. HAGE III\*  
LEONARD S. KOLSKY\*  
HON. GERALD S. MCGOWAN\*  
TAMARA DAVIS-BROWN\*  
\*NOT ADMITTED IN VA

Writer's Direct Dial  
(703) 584-8673  
tslamowitz@fcclaw.com

May 1, 2007

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: CC Docket 94-102  
Phase II E911 Report  
MTPCS. LLC dba Chinook Wireless

Dear Ms. Dortch:

On behalf of MTPSC, LLC dba Chinook Wireless ("Chinook"), submitted herewith is its Phase II E911 Report in compliance with the terms of the **Order**, CC Docket No. 94-102, FCC 05-200, released October 28, 2005, conditionally granting Chinook an extension of the deadline for compliance with Section 20.18(g)(1)(v) of FCC rules, 47 C.F.R. § 20.18(g)(1)(v).

Should any questions arise with respect to this matter, please feel free to communicate directly with the undersigned.

Very truly yours,

  
Todd Slamowitz

Enclosure

No. of Copies rec'd 074  
List ABCDE

ORIGINAL

FILED/ACCEPTED

MAY - 1 2007

Federal Communications Commission  
Office of the Secretary

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

**FILED/ACCEPTED  
MAY - 1 2007**

Federal Communications Commission  
Office of the Secretary

In the Matter of	)	
	)	
Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems	)	CC Docket No. 94-102
	)	
Petitions for Waiver of Enhanced 911 Phase II Requirements	)	
	)	

**MAY 1, 2007 QUARTERLY REPORT OF MTPCS, LLC  
dba CHINOOK WIRELESS**

By Order dated March 8, 2006,<sup>1</sup> the Federal Communications Commission ("FCC" of "Commission") granted MTPCS, LLC dba Chinook Wireless ("Chinook") a waiver of the requirement in Section 20.18(g)(1)(v) of the Commission's Rules that carriers employing handset-based E911 location technology achieve 95% penetration, among their subscribers, of location-capable handsets by December 31, 2005. By that waiver, the December 31, 2005 deadline was extended until September 30, 2006. As a condition of that waiver, the Commission required that Chinook submit status reports, on a quarterly basis, commencing February 1, 2006.

This filing is the requisite May 1, 2007 status update.

---

<sup>1</sup> *Revision of the Commission's Rules to Ensure Compatibility with Enhanced E911 Emergency Calling Systems, Petitions for Waiver of Enhanced 911 Phase II Requirements, Order*, CC Docket No. 94-102 (Rel. October 28, 2005). ("Waiver Order")

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

Chinook has received Phase II requests from the following counties: Cascade, Gallatin, Flathead, Yellowstone, Chouteau, Missoula, Lewis and Clark, Blaine, Hill, Lewiston/Fergus and Ravalli County.<sup>2</sup> As stated in its Quarterly Reports, Chinook recently completed conversion of its entire network from CDMA to GSM. As explained in its waiver request, Chinook was utilizing a handset-based technology for its CDMA network. For its GSM network, Chinook is employing a network-based solution and is no longer using a handset-based technology for any of its calls.

2. **The dates on which Phase II service has been implemented or will be available to PSAPs served by Chinook's wireless network**

As explained in its most recent Quarterly Report, Chinook notified interested PSAPs, both before and after its August 2006 conversion to GSM, that due to the switchout of its entire network infrastructure, it would need to recommence and implement E911 Phase II on the new network. Fortunately, the PSAPs understand that the technology change out means the Phase II effort is being undertaken a second time. Chinook is keeping PSAPs apprised in detail of events. Chinook has made substantial progress toward implementing Phase II service in its service area. It is currently delivering Phase II service on its GSM network to the following PSAPs in its service area that have requested and are capable of receiving Phase II service:

---

<sup>2</sup> As of the date of this filing, Chinook is not providing commercial service in Blaine County. Upon commencement of **commercial** service, it anticipates being capable of delivering Phase II service to the Blaine County PSAP in a timely manner.

Cascade, Chouteau, Gallatin and Yellowstone. Further, Chinook is in the process of deploying and testing Phase II service in the following PSAPs: Hill, Lewiston/Fergus, and Ravalli (with respect to Hill County and Lewiston/Fergus County, Chinook was delayed in establishing TI lines from the ILEC that provides the selective routers for these counties until the ILEC revised and implemented certain tariffs affecting TI service). Chinook's engineers continue to work on Phase II implementation with a nationally recognized E911 services provider, which includes the driving and loading of Phase II data into the Serving Mobile Location Centre (SMLC) server that is required for Phase II implementation. For these three PSAPs, Chinook anticipates the driving and loading of data will commence within the next few weeks. Therefore, it anticipates being capable of delivering Phase II service to these PSAPs by no later than May 31, 2007.

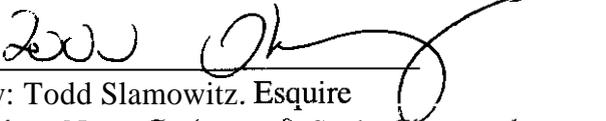
Further, as mentioned in its previous Quarterly Report, due to a need for the LEC to upgrade its selective router, Chinook continues to work with Flathead county E911 officials to determine how they would like matters to proceed since they are not currently capable of receiving E911 information. Finally, for Lewis and Clark County and Missoula County, which requested enhanced services more recently, Chinook fully expects to be capable of delivering Phase II information by and, most likely, well before October 1, 2007.

3. **Status of its efforts to convert its network to a GSM, network-based system**

As stated in its prior Quarterly Reports, Chinook has completed conversion of its entire network from CDMA to GSM, network-based system

Respectfully Submitted,

MTPCS, LLC dba Chinook Wireless

  
By: Todd Slamowitz, Esquire  
Lukas, Nace, Gutierrez & Sachs Chartered  
Its Attorney

May 1, 2007