

Copper Valley Wireless, Inc.
333 Fairbanks Street
Suite 12
Valdez, Alaska 99686

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 – 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 94-102,
95% ALI-Capable Handset Penetration Requirement,
Rule Section 20.18(g)(1)(v) and Related Requirements.

Sixth Quarterly Report

Dear Ms. Dortch:

By Order (CC Docket No. 94-102), FCC 06-41, released March 30, 2006 (the “Order”), the Commission granted the Filer, Copper Valley Wireless, Inc., extensions of time within which (1) to meet the ALI-capable handset activation deadlines and (2) to meet the Rule Section 20.18(g)(1)(v) 95% ALI-capable handset penetration deadline. The Filer has elected to deploy a handset-based E-911 solution.

Specifically, under the relief granted by the Order:

- 1) The Filer has until February 27, 2007 to begin selling ALI-capable handsets, and to ensure that 100% of all new handset activations are ALI-capable, in the areas served by the Valdez, Glennallen, Lake Louise, Willow Creek, Tolsona Ridge and Paxson Cell Sites (*i.e.*, the six cells slated for construction during the Summer 2006 building season).
- 2) The Filer has until February 25, 2008 to begin selling ALI-capable handsets, and to ensure that 100% of all new handset activations are ALI-capable, in the areas served by the remaining cell sites, which are slated for construction during the Summer 2007 building season.
- 3) The Filer has until February 25, 2009 to meet the requirement that 95% of the handsets on the system be ALI-capable.

In regard to the foregoing, it should be noted that since December 2005, the Filer has been marketing only multi-mode handsets. Specifically, since December 2005, the Filer has been marketing tri-mode handsets that operate on the analog cellular, CDMA cellular and CDMA Broadband PCS air interfaces; and, since June of 2007, the Filer has been marketing additional dual-mode handsets that operate on the CDMA cellular and

CDMA Broadband PCS air interfaces. All of these handsets are ALI-capable for the CDMA air interfaces. Thus, 100% of all new handset activations have been ALI-capable for CDMA since December 2005.

This report is submitted pursuant to the requirements of Paragraph No. 20 of the *Order*, and is as follows:

Item 1: The number and status of E-911 Phase II requests from Public Safety Answering Points (“PSAPs”), including those requests that the Filer may consider invalid: The Filer has not received any PSAP requests for E-911 Phase II service.

Item 2: The dates on which E-911 Phase II service has been implemented or will be available to the PSAPs served by the Filer’s system: E-911 Phase II service has not been implemented on the Filer’s system. In accordance with Commission requirements, E-911 Phase II service will be implemented within six months following receipt of a valid PSAP request, absent an extension of time from the Commission or an alternate deployment date obtained from the requesting PSAP.

Item 3: The status of the Filer’s coordination efforts with PSAPs for alternative 95% ALI-capable handset activation and penetration dates: The Filer has not had any coordination efforts with the PSAPs on this particular subject. However, the Filer has kept the PSAPs in its area apprised of its E-911 plans and roll-out schedule, updating this information as needed.

Item 4: The Filer’s efforts to encourage customers to upgrade to ALI-capable handsets: In view of the Filer’s decision to install a Code Division Multiple Access (“CDMA”) replacement cellular system, the Filer is marketing multi-mode handsets that will operate using the analog and CDMA air interfaces. The Filer began marketing the **multi-mode** handsets in December of 2005. These multi-mode handsets are ALI-capable, but the E-911 automatic location information function will not perform on the analog facilities. However, the ALI function will perform on the replacement CDMA facilities, most of which have been installed and placed into commercial service.

At present, all new handset activations consist of the multi-mode, ALI-capable handsets discussed in the preceding paragraph. Part of the Filer’s marketing plan for the new handsets is to encourage existing customers to replace their non-ALI-capable handsets with ALI-capable ones.

Item 5: The status of the Filer’s ordering and installing CDMA network upgrade equipment for each of its cell sites: As reflected in the “Petition for Waiver or Temporary Stay,” filed December 20, 2005, and which forms the basis for the relief granted in the *Order*, the equipment replacement project has been a large undertaking with a truly staggering financial outlay requirement for a company of the Filer’s extremely small size and limited financial resources.

In July of 2006, the Filer made a formal equipment vendor selection, and thereafter signed the equipment purchase and installation agreement.

As noted in various other filings with the Commission, the equipment replacement projected has been accelerated. The first phase now consists of nine of the cell site locations, not six as originally envisioned. The Valdez, Glennallen, Lake Louise, Willow Creek, Tolsona Ridge, Paxson, Naked Island, Slana, and Whittier Cell Sites are the nine locations that now comprise the first phase. At present, the switch has been installed along with the base station equipment for all nine of the cell sites; and these facilities have been placed into commercial service. These facilities (encompassed by the first phase) were turned on for commercial service on April 14, 2007.

The CDMA equipment for the remaining four cell sites (*i.e.*, the locations encompassed by the second phase of the equipment replacement project) are scheduled to be completed and placed into commercial service by September or October of 2007.

Item 6: The status of the Filer's sales and activation of ALI-capable handsets in areas served by each of its cell sites: The Filer currently activates only ALI-capable handsets, as discussed under Item 4, above.

Item 7: The percentage of the Filer's customers with ALI-capable phones: As of July 1, 2007, seventy-four percent (74%) of the handsets on the system are the **multi-mode**, ALI-capable handsets discussed under Item 4, above. This is a substantial increase from the fifty-two percent (52%) reported in the "Fifth Quarterly Report."

Item 8: Until the Filer satisfies the 95% penetration requirement, detailed information on the Filer's status in achieving compliance, and whether the Filer is on schedule to meet the revised, February 25, 2009, deadline: As discussed above, the Filer currently activates only ALI-capable handsets and, as of July 1, 2007, 74% of the handsets on the system are ALI-capable. The Filer has developed a marketing program

to encourage existing customers to upgrade their handsets to the **multi-mode**, ALI-capable handsets discussed under Item 4, above. The Filer is on schedule to meet the February 25, 2009 deadline established in the Order.

Very truly yours,

Copper Valley Wireless, Inc.

Dated: 7/26/07

By: 
David Dengel
Chief Executive Officer &
General Manager, Copper
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Inc., Parent Corporation

In accordance with Rule Section 1.12, please refer any inquiries or correspondence to:

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