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

In the Matter of)
)
Revision of the Commission's Rules To)
Ensure Compatibility with Enhanced 911) CC Docket No. 94-102
Emergency Calling Systems)
)
Request for Waiver By Southern)
Communications Services d/b/a)
SouthernLINC Wireless)

To: The Commission

SOUTHERNLINC WIRELESS E911 PHASE II QUARTERLY REPORT:

AUGUST 1, 2007

By:

Christine M. Gill
David D. Rines
McDERMOTT WILL & EMERY LLP
600 Thirteenth Street, N.W.
Washington, D.C. 20005-3096
T: 202.756.8000
F: 202.756.8087

Holly Henderson
External Affairs Manager
SouthernLINC Wireless
5555 Glenridge Connector, Suite 500
Atlanta, Georgia 30342
T: 678.443.1500

Michael D. Rosenthal
Director of Legal and External Affairs
SouthernLINC Wireless
5555 Glenridge Connector, Suite 500
Atlanta, GA 30342
T: 678.443.1500

Attorneys for SouthernLINC Wireless

Dated: August 1, 2007

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To: The Commission

**SOUTHERNLINC WIRELESS E911 PHASE II QUARTERLY REPORT:
AUGUST 1, 2007**

Pursuant to the *Order* of the Federal Communications Commission (“FCC” or “Commission”) of February 12, 2007,¹ Southern Communications Services, Inc. d/b/a SouthernLINC Wireless (“SouthernLINC Wireless”) hereby provides the Commission its quarterly report regarding the status of its efforts to achieve ninety-five percent penetration of automatic location identification (ALI)-capable handsets among its

¹ / *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Further Waiver by Southern Communications Services, Inc. d/b/a SouthernLINC Wireless, CC Docket No. 94-102, Order, DA 07-659 (rel. Feb. 12, 2007) (“Order”)* (granting SouthernLINC Wireless until November 12, 2007, to achieve ninety-five percent penetration of location-capable handsets among its subscriber base and requiring the filing of quarterly status reports).

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subscribers pursuant to Section 20.18(g)(1)(v) of the Commission’s Rules, 47 C.F.R. § 20.18(g)(1)(v).

I. BACKGROUND

On July 26, 2005, SouthernLINC Wireless, a “qualified Tier III carrier” as that term is defined in Section 107 of the *ENHANCE 911 Act*,² submitted a Request for Waiver seeking a limited extension of the Commission’s December 31, 2005, handset deployment deadline to allow SouthernLINC Wireless an additional twenty-four months to achieve ninety-five percent penetration of location-capable handsets among its subscriber base.³ As set forth in the Request for Waiver and subsequent filings, SouthernLINC Wireless faces numerous challenges in its efforts to achieve the required level of penetration of location-capable handsets, including (i) a latent software defect in the Motorola A-GPS-equipped handsets used by SouthernLINC Wireless subscribers that rendered all A-GPS services in these handsets unusable for E911 location in July 2004; (ii) the substantial portion of handsets assigned to enterprise or government accounts that typically have long-term equipment replacement cycles and are both reluctant and resistant to upgrading from their current handsets to new location-capable handsets; and (iii) the number of SouthernLINC Wireless subscribers who utilize and rely on the range and coverage of higher-power 1 watt and 3 watt phones and who are unwilling to upgrade to a lower-power (0.6 watt) location-capable handset, which could decrease their ability

² / National Telecommunications and Information Administration Organization Act – Amendment, Publ. L. No. 108-494, 118 Stat. 3986 (1994) (“*ENHANCE 911 Act*”).

³ / Request for Waiver by SouthernLINC Wireless, CC Docket No. 94-102, filed July 26, 2005 (“Request for Waiver”).

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to receive any communications services – including emergency services – in remote areas.⁴

On November 3, 2005, the Commission granted SouthernLINC Wireless a limited ten-month extension of the ninety-five percent handset penetration deadline and required SouthernLINC Wireless to file status reports on a quarterly basis.⁵ On December 5, 2005, SouthernLINC Wireless filed a Petition for Reconsideration and Clarification of the *2005 Order*.⁶ This Petition is still pending before the Commission, and SouthernLINC Wireless clarifies that all subsequent filings it has made in this docket – including the instant Quarterly Report – have been submitted separate from and without prejudice to its pending Petition.

On July 24, 2006, SouthernLINC Wireless filed its first Request for Further Waiver, seeking an additional extension of the ninety-five percent penetration deadline until December 31, 2007.⁷ On October 20, 2006, SouthernLINC Wireless submitted a request to the Commission for leave to withdraw without prejudice its Request for

⁴ / *See, e.g.*, Request for Waiver at 2 – 3; *See also* SouthernLINC Wireless Notice of *Ex Parte* Presentation, CC Docket No. 94-102, filed September 9, 2005; SouthernLINC Wireless Response to Request for Additional Information Supporting its Request for Waiver of the E911 Phase II Handset Deployment Deadline, CC Docket No. 94-102, filed Oct. 26, 2005 (“Supplemental Filing”).

⁵ / *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver by Southern Communications Services, Inc. d/b/a SouthernLINC Wireless*, CC Docket No. 94-102, Order, FCC 05-188 (rel. Nov. 3, 2005) (“*2005 Order*”) (granting SouthernLINC Wireless until November 3, 2006, to achieve ninety-five percent penetration of location-capable handsets among its subscriber base and imposing certain conditions on the grant of waiver).

⁶ / Petition for Reconsideration and Clarification of SouthernLINC Wireless, CC Docket No. 94-102, filed December 5, 2005 (“Petition”).

⁷ / Request for Further Waiver by SouthernLINC Wireless, CC Docket No. 94-102, filed July 24, 2006 (this Request was subsequently withdrawn).

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Further Waiver so that it could provide the Commission with additional relevant information on SouthernLINC Wireless' compliance efforts.⁸

On November 2, 2006, SouthernLINC Wireless filed its revised Request for Further Waiver.⁹ On February 12, 2007, the Commission released its *Order* granting SouthernLINC Wireless a limited extension until November 12, 2007, of the ninety-five percent handset penetration deadline and requiring SouthernLINC Wireless to file status reports on a quarterly basis.

II. INFORMATION REGARDING THE STATUS OF SOUTHERNLINC WIRELESS' E911 PHASE II DEPLOYMENT EFFORTS

In accordance with the *Order*,¹⁰ SouthernLINC Wireless provides the Commission with the following information regarding its E911 Phase II deployment status and efforts.

A. Number and Status of Phase II Requests from PSAPs

As of July 31, 2007, SouthernLINC Wireless had received 140 requests for Phase II service out of a total of 302 PSAPs in its service territory. SouthernLINC Wireless has completed deployment in response to 129 of these requests, with 11 requests still pending. Of these 11 pending requests, none has extended past the six month deadline. In all cases, SouthernLINC Wireless remains in regular communication with PSAPs regarding Phase I and Phase II deployment and stands ready to take whatever steps it can to ensure that enhanced 911 services are made available as expeditiously as possible.

⁸ / See SouthernLINC Wireless Request for Further Waiver of Section 20.18(g)(1)(v) of the Commission's Rules, CC Docket No. 94-102, filed Oct. 20, 2006 ("Withdrawal Request").

⁹ / Request for Further Waiver by SouthernLINC Wireless, CC Docket No. 94-102, filed November 2, 2006 ("Request for Further Waiver").

¹⁰ / *Order* at ¶ 16.

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A chart summarizing SouthernLINC Wireless' deployment of E911 Phase I and Phase II service to PSAPs is provided as Attachment A. Pending Phase I and Phase II requests are detailed in the chart enclosed as Attachment B.

Because SouthernLINC Wireless has chosen to deploy a handset-based solution to provide caller location data to PSAPs, it is currently capable of providing E911 Phase II service to any and all Phase II-capable PSAPs in its service territory.

B. Estimated Dates on Which Phase II Service Will Be Available to PSAPs Served by SouthernLINC Wireless' Network

As described above, SouthernLINC Wireless is capable of providing Phase II service to any requesting Phase II-capable PSAP in its service territory. Estimated deployment dates for pending Phase I and Phase II requests are provided in the chart enclosed as Attachment B.

C. Status of Coordination Efforts With PSAPs for Alternative Handset Penetration Dates

SouthernLINC Wireless remains in constant communication with all PSAPs in its territory regarding E-911 services, its ability to provide Phase I and Phase II service, and any problems that may arise that affect service availability. These communications may be written or verbal, and they include information on SouthernLINC Wireless' ability to provide Phase II service to its customers and the degree to which its customers can benefit from Phase II capabilities. SouthernLINC Wireless' 911 services coordinator interacts with the 911 community on a regular basis, including attending meetings where she provides verbal updates on SouthernLINC Wireless' Phase II deployment status. Depending on the nature of the meeting, such information may be provided to all attendees in the form of a general announcement or may be targeted to interested parties

in specific discussions. Since the submission of SouthernLINC Wireless' 2nd Quarter 2007 Report,¹¹ the 911 services coordinator has provided an update to the Alabama NENA officers in July 2007.

As described in its previous quarterly status reports, SouthernLINC Wireless has undertaken a communications program for Phase II-capable PSAPs in its service territory focusing on the customer handset penetration issue.¹² Specifically, SouthernLINC Wireless is providing these PSAPs with regular updates every two months via U.S. mail on the number of SouthernLINC Wireless customers using location-capable handsets and its progress towards the goal of ninety-five percent penetration of location-capable handsets. The most recent of these written updates was sent to PSAPs on June 11, 2007.

In addition, SouthernLINC Wireless always provides PSAPs with written confirmation of Phase II implementation once all activities, including testing, have been completed. These communications also include information on the number of SouthernLINC Wireless customers using location-capable handsets and its progress towards the ninety-five percent penetration goal. These PSAPs will also receive the regular mail updates described above.

D. Efforts to Encourage Subscribers to Upgrade to Location-Capable Handsets

SouthernLINC Wireless has redoubled its already extensive efforts to encourage subscribers to upgrade to location-capable handsets, including launching an aggressive program offering customers with non-location capable handsets a free replacement phone

¹¹ / SouthernLINC Wireless E911 Phase II Quarterly Report: May 1, 2007, CC Docket No. 94-102, filed May 1, 2007 (“2nd Quarter 2007 Report”).

¹² / *See, e.g., Id.* at 6 – 7.

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with no additional contract requirements. This offer and other measures undertaken by SouthernLINC Wireless are described in more detail below in this section.

To communicate with customers about E-911 services and capabilities, SouthernLINC Wireless launched a twice-quarterly bill message communications plan in 2006 to provide information to its customers about E-911, and is continuing this program in 2007 with a revised bill message. The text of the revised bill message is provided as Attachment C. This bill message is designed to draw customers' attention to the issue of wireless E-911 service – as well as the need for an A-GPS-capable phone – and send them to a dedicated area on the SouthernLINC Wireless website for more details on E-911 services, including the availability of basic, Phase I, and Phase II services across SouthernLINC Wireless' service territory and information on which handset models are location-capable. A link to information on SouthernLINC Wireless' current handset promotions is also featured at this location so that customers can make decisions on handset upgrades, should they choose to do so. This section of the website was launched in early February 2006.¹³

In the second quarter of 2006, SouthernLINC Wireless also added a message about A-GPS handsets and 911 service to its “on hold” message at its customer support center, providing customers with another avenue from which to learn about the importance of location capabilities in emergency situations. The “on hold” message program is continuing through 2007.

¹³ / See <http://www.southernlinc.com/e911.asp>. A direct link to this section is also featured near the top of SouthernLINC Wireless' home page.

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In addition to the customer communications measures described above, SouthernLINC Wireless has also undertaken numerous aggressive efforts to increase customer adoption of location-capable handsets as rapidly as possible, as described in its Compliance Plan, which was filed with the Commission on May 3, 2006,¹⁴ as well as in previous quarterly status reports¹⁵ and the Request for Further Waiver. SouthernLINC Wireless notes that many of these efforts – such as customer calling and direct-mail campaigns, direct customer outreach programs, numerous offers of free phones and heavily discounted phones, rebates, free accessories, and offers of free services (including free minutes and a month of free location/navigation services) – have also been taken by other carriers and cited to approvingly by the Commission.¹⁶ Examples of efforts undertaken by SouthernLINC Wireless were recently summarized in its 2nd Quarter 2007 Report, which is incorporated by reference.¹⁷

¹⁴ / *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver by Southern Communications Services, Inc. d/b/a SouthernLINC Wireless*, CC Docket No. 94-102, SouthernLINC Wireless E911 Phase II "Compliance Plan," filed May 3, 2006, at 6 – 9 ("Compliance Plan"). SouthernLINC Wireless hereby incorporates its Compliance Plan by reference.

¹⁵ / *See, e.g.*, 2nd Quarter 2007 Report; *See also* SouthernLINC Wireless E911 Phase II Quarterly Report: February 1, 2007, CC Docket No. 94-102, filed Feb. 1, 2007 ("1st Quarter 2007 Report"); SouthernLINC Wireless E911 Phase II Quarterly Report: November 1, 2006, CC Docket No. 94-102, filed Nov. 1, 2006.

¹⁶ / *See, e.g.*, *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver of Location-Capable Handset Penetration Deadline by Sprint Nextel Corporation*, CC Docket No. 94-102, Order, FCC 06-183 (rel. Jan. 5, 2007) ("*Sprint Nextel Waiver Order*"), ¶ 32 (citing examples of aggressive efforts by Tier III carriers, including free and discounted phones, free minutes, a month of free service, customer calling campaigns, etc.).

¹⁷ / 2nd Quarter 2007 Report at 8 – 10.

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Since SouthernLINC Wireless filed its last quarterly report on May 1, 2007, it has both planned and undertaken additional measures to achieve E911 Phase II compliance, including:

- In June 2007, SouthernLINC Wireless launched a targeted program offering free A-GPS-capable phones with no contract requirements to customers with non-location-capable phones. To make this offer even more attractive, SouthernLINC Wireless is offering these customers a choice from among four different phone models, thus enabling customers to select a replacement phone that most closely suits their service needs and most closely matches the features and capabilities they enjoy in their current phones (or that they wish their current phone provided). This program is described in more detail in Section II.F. below. A copy of the SouthernLINC Wireless press release announcing this program is provided as Attachment D.
- If a customer using a non-location capable phone wishes to upgrade to a model other than one of the four free models described above, the customer may upgrade by paying the current promotional price for the phone and will not be subject to any additional contract terms. In addition to the free phone offer, SouthernLINC Wireless' 3rd Quarter promotional pricing offers a wide array of phones for less than \$100.
- To advertise the free phone offer described above, SouthernLINC Wireless launched a text messaging campaign aimed at subscribers believed to be using non-compliant phones. The initial round of text messages sent in June 2007 went to customers located in close proximity to a SouthernLINC Wireless retail store. These messages were accompanied by phone calls to these same customers. A second round of text messages was launched in July 2007 and was targeted at *all* customers believed to be using non-compliant phones (please note that not all customers have text messaging capability). As of July 31, 2007, approximately 11,300 messages had been sent. SouthernLINC Wireless will be following up with all of its customers believed to be using non-compliant phones (including those who do not have text messaging capability) through a direct mailing campaign that is scheduled to drop in early August 2007. Copies of materials to be included in this direct mailing campaign are provided as Attachment E.
- In addition to the text message, customer calling, and direct mail campaigns described above, SouthernLINC Wireless is also promoting A-GPS capability and its offer of a free phone with no additional contract requirements through window displays and brochures in its retail stores. A copy of the window poster for SouthernLINC Wireless' retail stores is

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provided as Attachment F. A copy of the in-store brochure is provided as Attachment G.

- SouthernLINC Wireless has also dedicated customer support resources to placing outbound calls to large, multi-line customers who are believed to be using non-compliant phones. These customers are advised of the offer of free A-GPS-capable phones without additional contract terms.
- SouthernLINC Wireless has extended through the third quarter of 2007 a data service promotion that provides customers with a free 30-day trial of SouthernLINC Wireless' "Tele Nav 10" location service. This service requires an A-GPS-capable phone, thus providing customers yet another reason to switch handsets.
- SouthernLINC Wireless is attending and setting up booths at various trade shows and government conferences attended by SouthernLINC Wireless business and government customers in order to describe and promote the benefits of A-GPS and encourage upgrades to A-GPS-capable handsets, including through special upgrade incentives. Examples of recent conferences that SouthernLINC Wireless representatives have attended include the Alabama Sheriffs' Association, the Alabama Police Chiefs' Association, the Georgia Sheriffs' Association, the Georgia Department of Transportation, and the Alabama School Transportation Conference.

Finally, as the Commission is aware, many of SouthernLINC Wireless' customers continue to rely on higher power handsets that are not A-GPS-capable. These customers include public safety, government, and utility subscribers who must often work in challenging environments and remote areas, as well as other subscribers who travel through or operate in remote areas where the coverage of lower power handsets is perceived as insufficient. There continues to be a concern among such subscribers that the lower power capability of location-capable handsets could result in the inability to communicate from areas that can currently be reached by their existing higher power handsets, thus rendering them without access to any emergency services in these areas whatsoever.¹⁸ Due to SouthernLINC Wireless' efforts, the size of this group of

¹⁸ / See Section 107 of the *ENHANCE 911 Act*.

customers has dropped considerably to [] percent of the company's subscriber base. However, the pace of customer transition away from higher power handsets has slowed considerably, and SouthernLINC Wireless has encountered strong resistance from subscribers who do not want to trade in their high power handsets.

E. Percentage of Customers With Location-Capable Handsets

Approximately eighty-eight (88) percent of SouthernLINC Wireless customers currently use location-capable handsets.

F. Status in Achieving Compliance

Although SouthernLINC Wireless faces numerous challenges in its efforts to achieve ninety-five percent penetration of location-capable handsets among its subscribers, it is committed to achieving full compliance as quickly as possible and has made significant progress towards this goal. As a result of the variety of outreach, promotional, and marketing efforts it has undertaken, SouthernLINC Wireless has succeeded in increasing its level of penetration of location-capable handsets from approximately forty-three (43) percent on October 31, 2005, to approximately eighty-eight (88) percent as of July 31, 2007 – a level of success that only recently became apparent, as described in SouthernLINC Wireless' previous Quarterly Report. SouthernLINC Wireless is now building on these positive results in order to further accelerate customer adoption of location-capable handsets through additional promotional and outreach measures such as those described in Section II.D. above.

Many of SouthernLINC Wireless' compliance efforts compare favorably to the efforts of other Tier III carriers cited in previous Commission Orders.¹⁹ These efforts

¹⁹ / See, e.g., *Sprint Nextel Waiver Order* at ¶ 32.

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have included customer calling and direct-mail campaigns, text messaging campaigns, direct customer outreach programs, numerous offers of free phones and heavily discounted phones, rebates, free accessories, and offers of free service (including free minutes, a month of free location/navigation services, and a month of free data/Internet access service).

In June 2007, SouthernLINC Wireless launched a targeted program offering free A-GPS-capable phones to customers believed to be using non-location-capable phones without any contract requirements. In order to make this program even more attractive – and thus provide even greater incentive for these customers to upgrade their phones²⁰ – SouthernLINC Wireless is offering these customers a choice from among four different location-capable phone models with a variety of features and capabilities. These four models, which include two “slab” models and two “flip-phone” models, together represent fully one-third of SouthernLINC Wireless’ current handset lineup. This array allows customers to select a free replacement phone that most closely suits their service and usage needs and which most closely matches the features and capabilities they enjoy in their current phones (or that they wish their current phone provided). SouthernLINC Wireless believes that this approach increases the likelihood that customers will be

²⁰ / As SouthernLINC Wireless described in its initial Request for Waiver, its efforts to restore location-capability to customers in the wake of the July 2004 A-GPS software defect included an offer to government customers of a free replacement phone furnished directly by Motorola with no strings attached. However, fewer than one percent of SouthernLINC Wireless’ eligible customers chose to take advantage of this offer. *See* Request for Waiver at 21 – 22. Because this illustrated that the decision to replace or upgrade a handset was not necessarily a question of handset cost or contract commitment, SouthernLINC Wireless felt it necessary at the time to spread its limited resources across additional programs as well, such as customer outreach and customer education regarding E911 and the advantages of A-GPS capability.

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willing to replace their non-location-capable handset with a new A-GPS-capable handset. A copy of SouthernLINC Wireless' press release announcing this program is provided as Attachment D.

If a customer using a non-location-capable phone wishes to upgrade to a model other than one of the four free models described above, the customer may do so by paying the current promotional price for that phone and will not be subject to any additional contract terms. In addition to the free phone offer, SouthernLINC Wireless' 3rd Quarter promotional pricing offers a wide assortment of handsets, the majority of which are priced at less than \$100.

To advertise the free phone offer described above, SouthernLINC Wireless has launched an aggressive, multi-stage customer outreach program involving text messages, direct calling, and direct mail to customers that have been identified as having non-compliant phones. As of July 31, 2007, SouthernLINC Wireless had sent approximately 11,300 text messages advising customers of the free replacement phone offer. These text messages have been followed by direct calls to customers who are located in proximity to a SouthernLINC Wireless retailer. SouthernLINC Wireless will also be following up with all of its customers believed to still be using a non-compliant phone with a direct mail campaign that will drop in early August 2007. Copies of materials to be included in this direct mailing campaign are provided as Attachment E.

In addition to the text message, customer calling, and direct mail campaigns described above, SouthernLINC Wireless is also promoting A-GPS capability and its offer of a free phone with no additional contract requirements through window displays and brochures in its retail stores. A copy of the window poster for SouthernLINC

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Wireless' retail stores is provided as Attachment F. A copy of the in-store brochure is provided as Attachment G.

Customers can take advantage of the free phone offer by contacting the SouthernLINC Wireless Customer Support Organization to receive their free phones by mail, or they can visit a SouthernLINC Wireless retail store to obtain their free phones. SouthernLINC Wireless has also dedicated customer support resources to placing outbound calls to large, multi-line customers who are believed to be using non-compliant phones to advise them of the free phone offer.

In addition to the programs described above, SouthernLINC Wireless continues to pursue other measures to increase subscriber adoption of location-capable handsets. Previously, many of SouthernLINC Wireless' offers of free or heavily discounted iDEN handsets have included a two-year contract commitment due to the impact of the relevant subsidies involved. Furthermore, based on previous experience, SouthernLINC Wireless lacked clear evidence of a direct correlation between a contract extension requirement and a customer's decision whether to upgrade to a new location-capable handset.²¹ However, SouthernLINC Wireless has revisited its policy on contract renewals.

SouthernLINC Wireless believes that it will be able to achieve the ninety-five percent penetration level and will continue to put forth substantial effort and resources into doing so. However, while SouthernLINC Wireless has made substantial progress and has achieved eighty-eight (88) percent penetration of location-capable handsets as of the date of this Report, SouthernLINC Wireless is not able to make a determination at

²¹ / See note 21 above regarding SouthernLINC Wireless' previous experience with a free phone/no contract extension program.

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this time as to whether it is on track to meet its revised compliance deadline of November 12, 2007.

As described in detail above, SouthernLINC Wireless recently launched a major campaign specifically targeting those customers identified in its recent handset audits as still using non-compliant phones (information that the company did not have until recently, as described in its recent filings in this docket).²² Because SouthernLINC Wireless is still in the middle of this campaign, it is still premature to determine what the full impact of this campaign – together with SouthernLINC Wireless' other, ongoing efforts – will be; nor does SouthernLINC Wireless yet have sufficient data to be able to extrapolate a revised schedule based on the results of these programs. Nevertheless, SouthernLINC Wireless is seeing results and will continue to pursue these and other aggressive efforts to achieve ninety-five percent penetration as quickly as possible and, as it develops additional data, will keep the Commission advised as appropriate as to its progress in achieving full compliance.

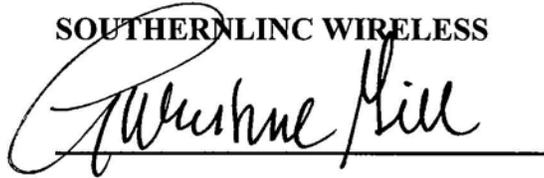
²² / *See, e.g.*, 2nd Quarter 2007 Report at 10; 1st Quarter 2007 Report at 10 – 12.

III. CONCLUSION

As demonstrated above, SouthernLINC Wireless is continuing to put forth substantial effort and resources into migrating as much of its subscriber base as possible to location-capable handsets, and it is committed to achieving full compliance with the Commission's handset penetration requirement as quickly as possible.

Respectfully submitted,

SOUTHERNLINC WIRELESS

A handwritten signature in black ink, appearing to read "Christine M. Gill", is written over a horizontal line.

Christine M. Gill
David D. Rines
McDERMOTT WILL & EMERY LLP
600 Thirteenth Street, N.W.
Washington, D.C. 20005-3096
T: 202.756.8000
F: 202.756.8087

Michael D. Rosenthal
Director of Legal and External Affairs
SouthernLINC Wireless
5555 Glenridge Connector, Suite 500
Atlanta, GA 30342
T: 678.443.1500

Its Attorneys

Holly Henderson
External Affairs Manager
SouthernLINC Wireless
5555 Glenridge Connector, Suite 500
Atlanta, GA 30342
T: 678.443.1500

Dated: August 1, 2007

ATTACHMENT A

E911 Phase I and Phase II Deployment to PSAPs

Legal External Affairs
Project Status Report

E911 Phase I and II



A Southern

SouthernLINC Wireless External Affairs
Project Update

Last Reviewed: 7/31/2007

911 Deployments

Status as of July 31, 2007		Phase 1 Requests					Phase 2 Requests				
911 Implementation	Total PSAPs	Total Rec'd	Total Pending	Total Deployed	2007 Deployments	Total Past Deployment Deadline	Total Rec'd	Total Pending	Total Deployed	2007 Deployments	Total Past Deployment Deadline
AL	85	74	0	74	5	0	54	1	53	7	0
FL	12	11	0	11	0	0	10	0	10	2	0
GA	180	104	4	100	10	0	70	10	60	13	0
MS	25	11	0	11	0	0	6	0	6	1	0
Total	302	200	4	196	15	0	140	11	129	23	0

ATTACHMENT B

Status of Pending E911 Phase I and Phase II Requests

Phase 1 Sites

First Name	Last Name	Work Phone	PSAP Name	P1 6 Mo Deployment Due Date	P1 Deployment Scheduled Date
Jimmy	Williams	(706) 769-5665	Oconee County GA 911	30-Oct-07	TBD
Alex	Case	(706) 657-4111	Dade County GA 911	08-Nov-07	TBD
Wanda	Bragg	(912) 564-2826	Screven County GA 911	09-Nov-07	TBD
Jerry	Griffin	(229) 686-6588	Berrien County GA 911	14-Dec-07	TBD

Phase 2 Sites

First Name	Last Name	Work Phone	PSAP Name	P2 6 Mo Deployment Due Date	P2 Deployment Scheduled Date
Trudy	McDevitt	(770) 467-4313	Spalding County GA 911	05-Oct-07	TBD
Vernica	Crockett	(912) 384-7675	Coffee County GA 911	12-Oct-07	TBD
Julie	Rainey	(229) 431-2132	Dougherty County/City of Albany GA 911	23-Oct-07	TBD
Kirk	Pearson	(334) 624-9911	Hale County AL 911	30-Oct-07	TBD
Jimmy	Williams	(706) 769-5665	Oconee County GA 911	30-Oct-07	TBD
Alex	Case	(706) 657-4111	Dade County GA 911	08-Nov-07	TBD
Wanda	Bragg	(912) 564-2826	Screven County GA 911	09-Nov-07	TBD
Chad	Hope	(706) 367-1234	Jackson County GA 911	29-Nov-07	TBD
Jones	Beasley	(706) 384-7118	Franklin County GA 911	12-Dec-07	TBD
Jerry	Griffin	(229) 686-6588	Berrien County GA 911	14-Dec-07	TBD
Rex	Nelms	(706) 779-3911	Stephens County GA 911	14-Dec-07	TBD

ATTACHMENT C

Text of Bill Message Regarding A-GPS and E911

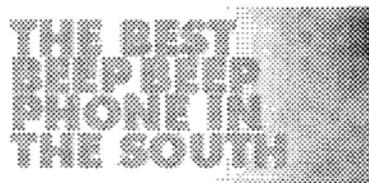
Text of Bill Message Regarding A-GPS and E911

When dialing 911 with A-GPS your phone may be a real lifesaver.

Customers should consider purchasing a phone with Assisted Global Positioning System (A-GPS) capability. When dialing 911, an A-GPS phone may automatically provide 911 operators with your number and approximate location – Wireless E911 Phase 2 service – making it easier and faster for emergency responders to find you. To make sure your phone has A-GPS capabilities, visit your local SouthernLINC Wireless store, dealer or call Customer Support at 1-800-406-0151 today. Wireless E911 Phase 2 service is only available if the applicable 911 Center has upgraded its equipment. To determine if your local 911 Center supports Wireless E911 Phase 2 service, go to southernlinc.com and click on “Enhanced 911.”

ATTACHMENT D

June 6, 2007 Press Release on SouthernLINC Wireless'
Handset Replacement Program



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Media Contacts

Valerie Holpp
SouthernLINC Wireless
(770) 550-0635
VHolpp@southernco.com

Lindsey Larkins
Edelman
(404) 262-3000
Lindsey.Larkins@edelman.co

SouthernLINC Wireless Ensures Customers Benefit From Assisted Global Positioning System (AGPS) Capability

ATLANTA – June 06, 2007 – SouthernLINC Wireless, a Southern Company (NYSE: SO), is taking steps to ensure all of its customers own phones equipped with Assisted Global Positioning System (AGPS) technology, which automatically provides 911 operators, who are equipped to receive the information, with the caller’s approximate location in the event of an emergency.

Effective immediately, SouthernLINC Wireless is actively reaching out to its customers without AGPS-enabled phones and giving them the opportunity to choose from a Motorola i265, Motorola i355, Motorola i560 or Motorola i670 at no cost and without requiring a contract extension to ensure that they can benefit from the AGPS technology. All of these phones are AGPS capable. The free phone offer without a contract extension applies only to SouthernLINC Wireless customers who have an active phone that is not AGPS capable.

“For several years now, SouthernLINC Wireless has been educating customers on the benefits of owning AGPS-equipped phones and offering various upgrade opportunities,” said Bob Dawson, president and CEO, SouthernLINC Wireless. “The current SouthernLINC Wireless offer is one of the most significant endeavors within the industry to ensure customers have the opportunity to own an AGPS capable phone.”

In 1999, the Federal Communications Commission (FCC) mandated that all wireless carriers implement technology enabling outfitted 911 centers to automatically receive a caller’s latitude and longitude coordinates to identify his/her location. Today, SouthernLINC Wireless’ entire suite of phones is AGPS-enabled.

For more information, visit: <http://www.southerlinc.com/e911.asp>

About SouthernLINC Wireless

SouthernLINC Wireless, a Southern Company (NYSE: SO), is an Atlanta-based regional major metro and rural areas in Alabama, Georgia, southeastern Mississippi and northern Louisiana. SouthernLINC Wireless bundles multiple communication options into one phone including push to talk, messaging, wireless Internet access and wireless data. More information about SouthernLINC Wireless by calling 1-800-818-LINC (5462) or visiting the SouthernLINC Wireless Web site at www.southernlinc.com

ATTACHMENT E

Materials for August 2007 Mailer to Customers

Choose from Four FREE AGPS Capable Phones

It's easy to get your AGPS capable phone:

1. Review the four FREE phone models
2. Select a model for each of your eligible accounts on the enclosed AGPS Equipment Form
3. Fax or mail your completed form by September 2, 2007
4. As soon as your equipment arrives, call Customer Support to transfer service and register your phone(s)

For more information, call us at 1-866-461-LINC.



A Southern Company

i265



- Sleek and stylish – only 4.5 oz
- Vibrant color screen
- Keypad designed for quick and easy dialing
- AGPS capable
- Push to Talk functionality

- Compact flip design – only 4.06 oz
- Built to MIL Standard 810F
- Color screen
- AGPS capable
- Push to Talk functionality

i670



Over for more
phone models.





i560

- Durable, rugged flip design – built to MIL Standard 810F
- Only 4.6 oz
- External color display
- AGPS capable
- Push to Talk functionality

- Rugged design – built to MIL Standard 810F
- Weather resistant
- Vivid color screen
- AGPS capable
- Push to Talk functionality



Over for more phone models.



i355

Respond by September 2, 2007
to replace your old equipment
without cost or additional obligation.

Choose from four FREE AGPS capable phones. Your new equipment will be shipped to the address on your AGPS Equipment Form.

**For more information,
call us at 1-866-461-LINC.**

 **SouthernLINC**
Wireless

A Southern Company

To avoid the \$150 equipment fee, call Customer Service at 1.866.461.LINC within 30 days of the order date to transfer service and register your new phone(s). The equipment, and promotions set forth herein are subject to changes as are the terms and conditions contained in the SouthernLINC Wireless customer agreement. Offer ends on 11/12/07. Motorola and the stylized M logo are registered with the U.S. Patent & Trademark Office. © Motorola, Inc. 2007. © 2007 Southern Communications Services, Inc. d/b/a/ SouthernLINC Wireless.

Sample Name
Address Line 1
Address Line 2
City, State 00000



Dear [Name]:

As a valued SouthernLINC Wireless customer, we are writing to make you aware of some important regulatory changes that affect your phone equipment.

In order to comply with Federal Communications Commission (FCC) regulations on 911 calls, SouthernLINC Wireless must soon ensure that that 95% of the phones on its network have Assisted Global Positioning System (AGPS) capability. AGPS technology enables emergency response personnel who use current technology to map the appropriate location of a 911 cellular call to within 135 yards. **This capability can be invaluable in times of emergency, when every second counts.**

Ensure Your Safety with AGPS

You have been identified as a customer with active phone(s) that may not have the AGPS functionality. To ensure that you have AGPS phone(s) we are offering you, without additional cost or obligation, one of four brand-new AGPS CAPABLE cellular phones to replace the equipment associated with each of the sub-accounts listed on the enclosed AGPS Equipment Form.

Get FREE Replacement of Your non-AGPS Phone Equipment Now

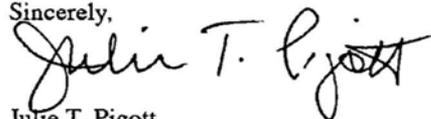
Receiving new AGPS capable phone(s) is easy. Here's how:

- 1) **Review the four FREE phone models** available to you.
- 2) **Select a new model** for each of your eligible accounts listed on the enclosed AGPS Equipment Form.
- 3) **Fax or mail your completed form** using the fax #1.877.765.6329 or envelope provided. You'll receive your phone(s) by UPS at the master account shipping address listed on the AGPS Equipment form.
- 4) **Call Customer Support at 1.866.461.LINC to transfer service and register your phone(s).** We are providing free replacement phone(s) to ensure that you are using an AGPS capable phone. **If you do not call to transfer service and register your phone(s) within 30 days of your order date, a \$150 equipment fee will be applied to your account for each unregistered replacement phone.**

We must receive your selection before **September 2, 2007** to replace your equipment FREE of charge without any contract extension required.

Thank you for being a valued SouthernLINC Wireless customer. We hope you'll take advantage of this equipment replacement offer for the sub-accounts listed on the AGPS Equipment Form. We want all of our customers to have equipment that can serve them should an emergency arise.

Sincerely,

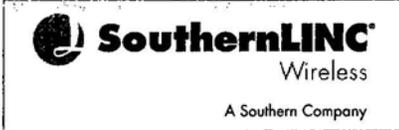


Julie T. Pigott

Vice President, Marketing and Customer Support

P.S. You must respond by September 2, 2007 to receive your new FREE phones!

5555 Glenridge Connector, Suite 500
Atlanta, GA 30342
www.southernlinc.com



Priority Handling
New Equipment Request Enclosed



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL
FIRST-CLASS MAIL PERMIT NO. 26706 ATLANTA GA



POSTAGE WILL BE PAID BY ADDRESSEE

SOUTHERNLINC WIRELESS
5555 GLENRIDGE CONNECTOR NE STE 500
ATLANTA GA 30342-9908



ATTACHMENT F

Window Display Poster for SouthernLINC Wireless
Retail Stores

Is your
phone A-GPS
capable?

Ask
today.

 **SouthernLINC**[®]
Wireless

A Southern Company

For more information, see your wireless service provider's website. Terms not included. Available at your service or wireless carrier's website. ©2007 Southern Communications Services, L.P. d/b/a SouthernLINC Wireless. All rights reserved. SouthernLINC Wireless is a registered trademark of SouthernLINC Wireless, Inc. SouthernLINC Wireless and the stylized LINC logo are registered with the U.S. Patent and Trademark Office. SC1419-1007

ATTACHMENT G

In-Store Brochure for SouthernLINC Wireless
Retail Stores

Is your phone A-GPS capable?

What is A-GPS?

The Federal Communication Commission (FCC) has mandated that wireless carriers implement technology that would enable 911 centers, equipped with the appropriate technology, to automatically receive a caller's latitude and longitude coordinates in order to identify the caller's location.

Ultimately, it's a matter of safety. When dialing 911, an Assisted Global Positioning System (A-GPS) phone will automatically provide 911 operators who are equipped to receive this information with your number and approximate location, making it easier and faster for emergency responders to find you. In an emergency, this may be critical.

Because of this, SouthernLINC Wireless is actively reaching out to its customers without A-GPS-enabled phones and giving them the opportunity to choose from a Motorola i265, Motorola i355, Motorola i560 or Motorola i670 at no cost and without requiring a contract extension, to ensure that they can benefit from the A-GPS technology. This phone offer without contract extension applies only to SouthernLINC Wireless customers who have an active phone that is not A-GPS capable and is in good standing.

 **SouthernLINC**
Wireless

A Southern Company



Is my phone A-GPS capable?

The following Motorola phones are A-GPS capable:

- iM240
- i58sr
- i88s
- i205
- i215
- i265
- i275
- i285
- i305
- i315
- i325
- i325IS
- i355
- i415
- i450
- i530
- i560
- i580
- i605
- i670
- i710
- i720
- i730
- i733
- i736
- i760
- i830
- i833
- i835
- i836
- i850
- i855
- i860
- i870
- i875
- i880

plus, the BlackBerry® 7100i™

What if my phone model is not listed above?

If your phone is not listed above, please contact Customer Support at 1-866-461-LINC (or dial 611 from your phone). You may be eligible for a replacement phone with no contract extension.



A Southern Company

To avoid the \$150 equipment fee, call Customer Support at 1.866.461.LINC within 30 days to transfer service and register your new phone(s). Offer may be withdrawn at any time without notice. Southern Company and affiliate company employees are not eligible for free phone replacement. SouthernLINC Wireless does not guarantee that using an A-GPS-capable phone will ensure that you will be located in an emergency. The BlackBerry and RIM families of related marks, images and symbols are the exclusive properties of and trademarks of Research In Motion Limited – used by permission. ©2007 Southern Communications Services, Inc. d/b/a SouthernLINC Wireless. ©2007 Motorola, Inc. Motorola and the stylized M logo are registered in the U.S. Patent and Trademark Office. All rights reserved. SCS-4199-7/07 DV