

## **CC Docket No. 94-102 – Status Report**

**Filed by:** Keystone Wireless, L.L.C.  
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**Date:** August 13, 2007

**To:** Marlene H. Dortch, Secretary  
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Washington, D.C. 20554

### **By Electronic Submission:**

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**STATUS REPORT**  
**August, 2007**  
**CC Docket No. 94-102**

Keystone Wireless, L.L.C. (“Keystone”) hereby submits its E911 Status Report, pursuant to *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver of Deadlines for Implementation of Phase II E911 of Key Communications, LLC and Keystone Wireless, LLC*, CC Docket No. 94-102, *Order*, 20 FCC Rcd 16927 ¶19 (2005).

**Carrier Identifying Information:**

**Carrier Name:** Keystone Wireless, L.L.C. – FRN 0007 4157 06

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**Information Regarding PSAPs:**

Since the submission of its last Status Report, Keystone has received no new Phase I or Phase II E-911 requests from any PSAP in its market. So far, Keystone has received Phase I and/or Phase II requests from eight out of the nine PSAPs in its market, and has completed installation of its Phase I deployments in all eight counties (*i.e.*, Berks County, Centre County, Lycoming County, Schuylkill County, Montour County, Clinton County, Northumberland County, and Snyder County). As previously reported, Keystone engaged Essential Management Services, LLC (“EMS”) to assist it in interfacing with the various PSAPs in its market. EMS recently contacted the ninth PSAP, Union County, to find out if that PSAP would be submitting a Phase I and/or Phase II E-911 request in the near future. To date, EMS has not received a response from that PSAP.

Keystone and EMS continue to maintain regular contact with the PSAPs and to provide them with copies of all E-911 related submissions to the Federal Communications Commission. Additionally, EMS continues to attend the monthly Public Safety Regional Meetings, where it discusses E-911 matters with the PSAPs on behalf of Keystone. To date, no PSAP has expressed any concerns or issues with respect to Keystone’s Phase II E-911 implementation efforts. Likewise, the Pennsylvania Emergency Management Agency (“PEMA”), which is the agency responsible for overseeing Phase I and Phase II E-911 deployment by all state PSAPs, has yet to express any concerns or issues respecting Keystone’s deployment of Phase II E-911.

EMS also continues to work with PEMA regarding Keystone’s Wireless 9-1-1 Cost Recovery Plan (“CRP”), which was submitted to PEMA in March of this year and includes a total cost recovery for the provision of wireless Phase I and II E-911 service in Keystone’s entire market.

Keystone received notification in mid-June 2007 that the PEMA found Keystone eligible to receive E-911 cost recovery. However, the notice does not specify the amount of any funds to be distributed to Keystone for (i) reimbursement of its Phase I deployment costs and/or (ii) funding for its Phase II deployment. EMS is currently working to obtain clarification on these matters. Additionally, EMS is assisting Keystone with the submission to the PEMA of Keystone's invoices for its Phase I implementation costs, and with updating the PSAPs in Keystone's market respecting Keystone's eligibility for cost recovery.

### **Implementation of Phase II Service:**

Keystone continues to explore various Phase II E-911 network-based solutions and to monitor the market for new products or modifications to existing products that might potentially serve as a viable and affordable Phase II solution for Keystone's market. Keystone also continues to watch for any news of any manufacturer developing a GSM E-911 handset. As previously advised, Keystone cannot implement any known Phase II E-911 solution until it is able to secure financing. Once Keystone has secured funding for Phase II E-911 from the State of Pennsylvania or other sources, Keystone will immediately move forward with Phase II deployment plans.

As previously reported, the PEMA has a limited amount of funds to distribute annually among both PSAPs and carriers in the state who are seeking funding for Phase I and Phase II E-911 deployment, which funds are distributed in the following order of priority until expended: First, to PSAPs for Phase I; second, to carriers for Phase I; third, to PSAPs for Phase II; and fourth, to carriers for Phase II. Keystone anticipates that there will be sufficient state funds to reimburse only a portion of Keystone's Phase I E-911 costs, and none of Keystone's projected Phase II costs. Keystone will have to reapply next year and possibly subsequent years for reimbursement of any remaining Phase I costs and its eligible Phase II costs. Whatever funds the PEMA does decide to distribute to Keystone will be paid in four equal installments over the ensuing year. Keystone continues to explore other financing options.

Again as previously reported, upon receipt of any funds from the PEMA, Keystone will enter into new negotiations with the manufacturers of Phase II E-911 solutions that it previously dealt with, and will explore with them any new options they may have for network-based or hybrid Phase II E-911 solutions that would produce a better result in the areas of Keystone's market lacking adequate cell density. Keystone will then select the most viable and affordable Phase II E-911 solution and commence implementation of same. (In other words, if Keystone receives any significant reimbursement for the Phase I costs that Keystone incurred in the past, Keystone plans to use those funds to begin immediate implementation of Phase II.)

Because Keystone's service is very rural or less densely populated and the cell sites are spread far apart, only a portion of Keystone's service area is susceptible to triangulation techniques. Therefore, when Keystone implements one of the currently available network-based or hybrid Phase II E-911 solutions, which utilize triangulation techniques, it may not reach the requisite 67% and 95% accuracy requirements prescribed by §20.18(h)(1) or (2) of the Commission's rules, and likely will have to file a request with the Commission for a waiver of these accuracy

standards until such time as there are further technological advancements in this field allowing for full compliance with §20.18(h) of the rules.

**Construction of New Cells and Expansion of Coverage:**

Since its last Status Report, Keystone has not constructed any new cell sites in its market. However, Keystone recently completed modifications to one of its cell sites to change it to a three-sector site, thereby increasing Keystone's coverage from that cell site into areas in which it previously had no coverage and enhancing public safety by bringing Keystone's Phase I E-911 service to these newly-served areas. Keystone has no plans for constructing any new cell sites in its market in the near future. Keystone will revisit this issue during the fourth quarter of this year, when it will reassess its finances and available funding.