

CC Docket No. 94-102 – Status Report

Filed by: Keystone Wireless, L.L.C.
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Date: November 7, 2007

To: Marlene H. Dortch, Secretary
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By Electronic Submission:

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STATUS REPORT
November, 2007
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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. As previously reported, 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). Keystone and Essential Management Services, LLC (“EMS”), whom Keystone has retained as its liaison with the various PSAPs, still have not received any response from the PSAP for Union County (the ninth PSAP in the market) to any of the inquiries respecting whether that PSAP has Phase I and/or Phase II capabilities and will be submitting a request to Keystone any time in the near future.

Keystone and EMS continue to maintain regular contact with the PSAPs and to provide them with information on the status of Keystone’s Phase II E-911 deployment. Also, 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 maintaining communications with the PEMA regarding this matter, and with keeping the PSAPs in Keystone's market apprised of Keystone's eligibility for cost recovery and the status of the PEMA funding.

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 monitor the trade press and attend GSM association meetings looking for any news of any manufacturer developing a GSM E-911 handset or a more viable network-based solution that would produce a better result in the areas of Keystone's market lacking adequate cell density. As previously advised, 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.

Keystone and EMS are continuing to work with the PEMA to obtain funding for Keystone's Phase I and Phase II E-911 deployments. As previously reported, Keystone, through EMS, submitted its requisite funding applications to the PEMA in March of this year, during the annual filing window, and under Pennsylvania law the PEMA was suppose to notify Keystone by June 1, 2007, whether it would distribute any funds to Keystone. To date, Keystone has not received any notification from the PEMA regarding the amount of funds that the PEMA will distribute to Keystone (although Keystone was notified that it is eligible to receive such funds). Keystone's principals and EMS have continued to contact the PEMA to ascertain the status of Keystone's funding request. EMS even had a two-hour conference call with the PEMA staff a few weeks ago to discuss Keystone's funding request, and was advised at the end of that call that the PEMA would issue Keystone a determination by the end of that week. Keystone has yet to hear from the PEMA.

Also as previously reported, in 2007 we believe only two carriers, including Keystone, filed applications for E-911 funding. While we have no direct knowledge of the other carrier's funding request, the combined funding requests may exceed the amount of funds available for distribution by the PEMA this year. Thus, Keystone anticipates that there may 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 plans to apply 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 quarterly installments over the ensuing year. Upon receipt of any funds from the PEMA, Keystone will enter into new negotiations with the manufacturers of Phase II E-911 solutions and 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.) Keystone continues to explore other financing options.

Because Keystone's service area 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. Keystone has no plans for constructing any new cell sites in its market in the near future. Keystone will revisit this issue during the first quarter of next year, when it will reassess its finances and available funding.