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February 1, 2008

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Washington RSA No. 8 Limited Partnership Quarterly E911 Status Report
CC Docket No. 94-102*

Dear Ms Dortch:

Pursuant to the Commission's Orders in the above referenced proceeding,¹ Washington RSA No. 8 Limited Partnership ("WA8LP") hereby submits its E911 Status Report ("Report"). This Report provides the Commission with the current status of WA8LP's progress towards compliance with the 95% handset penetration requirement set forth in Section 20.18(g)(1)(v) of the Commission's Rules.² As detailed further in the Report, WA8LP continues to exceed the 95% ALI-capable handset penetration requirement.

Please contact the undersigned if you should have any questions regarding this Report.

Sincerely yours,



William J. Sill
Counsel for Inland Cellular Telephone Co.
General Partner, Eastern Sub-RSA Limited
Partnership

¹ See *In the Matter of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order*, FCC 06-25 (rel. Mar. 8, 2006); *Revision of the Commission's Rules to Ensure Compatibility with ENHANCE 911 Emergency Calling Systems*, *Order*, 22 FCC Rcd 2564, 2569-70, ¶17 (2007); *Motion for Leave to Withdraw Petition for Reconsideration Granted*, *Order*, DA 07-4357, (rel. Oct. 19, 2007).

² See 47 C.F.R. § 20.18(g)(1)(v).

**WASHINGTON RSA NO. 8 LIMITED PARTNERSHIP
QUARTERLY HANDSET PENETRATION STATUS REPORT
(CC DOCKET NO. 94-102)**

Washington RSA No. 8 Limited Partnership (“WA8LP”) pursuant to the Commission’s March 8, 2006 *Order*¹ and February 8, 2007 *Order*² in the above-referenced proceeding, was granted a limited waiver of the 95% handset penetration rate for its subscribers until August 8, 2007 and is required to file quarterly reports (“Quarterly Report”) during and beyond the extension period.³ WA8LP hereby submits its status report regarding its compliance with the 95% handset penetration requirement set forth in Section 20.18(g)(1)(v) of the Commission’s Rules.⁴

To be responsive to its subscribers’ needs, WA8LP offers its subscribers the flexibility to subscribe to either its pre-paid program or post-paid program. Under the former, a subscriber purchases a specified dollar amount of service prior to utilizing the service and in the latter, a subscriber is billed on a monthly basis after service has been rendered. This Quarterly Report includes data and information from both programs.

I. Number and Status of Phase II Requests From PSAPs

WA8LP provides cellular service on the B Block frequencies in the Washington 8 – Whitman, Idaho; in the Idaho 1(B)(2) RSA – Boundary RSA submarket, and in the Idaho 2 (B)(2) RSA submarket (Call Signs KNKN489, KNKQ400, and KNKR305). To date, WA8LP has received 5 valid requests for Phase II E911 service within the state of Washington. All 5 of these requests have been fulfilled and Phase II service is being provided. Similarly, WA8LP has received 2 Phase II requests from Idaho PSAPs in its service area, both of which have been completed.

¹ See *In the Matter of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order*, FCC 06-25 (rel. Mar. 8, 2006) (“*Order*”); see also Request for Limited Waiver of Washington RSA No. 8 Limited Partnership, CC Docket No. 94-102 (filed Dec. 5, 2005).

² See *Revision of the Commission’s Rules to Ensure Compatibility with ENHANCE 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order*, FCC 07-9 at ¶15 (rel. Feb. 8, 2007) (“*February Order*”); see also Request of Washington RSA No. 8 Limited Partnership for Limited Waiver, CC Docket No. 94-102 (filed Oct. 31, 2006) (“*October Request*”).

³ See *Order*, FCC 06-25 at ¶¶ 15-17. The WA8LP requested a one year extension, through October 31, 2007. See *October Request*. On February 8, 2007, the FCC granted a partial extension, until August 8, 2007. See *February Order* at ¶17. On September 25, 2007, the Partnership notified the FCC that it had surpassed the 95% benchmark by the August 8, 2007 deadline. See Washington RSA No. 8 Limited Partnership Motion for Leave to Withdraw Petition for Reconsideration, CC Docket No. 94-102 (filed Sept. 25, 2007).

⁴ See 47 C.F.R. § 20.18(g)(1)(v).

II. Dates On Which Phase II Service Has Been Implemented/Estimated Dates On Which Phase II Service Will Be Available to PSAPs Served by Its Network

Phase II service has been implemented for the following PSAPs:

<u>PSAP Name</u>	<u>Implementation Date</u>
Asotin County, Washington	May 2005
Columbia County, Washington	May 2005
Garfield County, Washington	May 2005
Walla Walla County, Washington	May 2005
Whitman County, Washington	May 2005
City of Moscow, Idaho	June 2005
Nez Perce County, Idaho	June 2006

III. Status of Coordination Efforts with PSAPs for Alternative 95% Handset Penetration Rates

Not applicable. As discussed in Section V *infra*, WA8LP exceeded the 95% ALI-capable handset penetration level on August 8, 2007.

IV. Efforts To Encourage Customers To Upgrade To Location-Capable Handsets

As discussed in Section V *infra*, WA8LP continues to exceed the 95% ALI-capable handset penetration level. WA8LP efforts to convince customers to switch to ALI-capable handsets have been successful and WA8LP will continue to reach out to those customers who have not yet switched to an ALI-capable handset.

V. Percentage of Customers with Location Capable Phones

As of the date of the instant filing, 96.71% of WA8LP's customers have upgraded to ALI-capable handsets.

VI. Detailed Information on the Status in Achieving Compliance

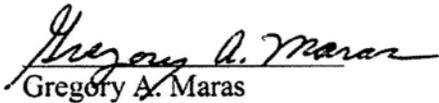
As discussed in Section V *supra*, WA8LP had successfully met the 95% ALI-capable handset penetration rate.

DECLARATION OF GREGORY A. MARAS

I, Gregory A. Maras, do hereby declare under penalty of perjury the following is true and correct:

1. I am the Secretary of Inland Cellular Telephone Company, General Partner of Washington RSA No. 8 Limited Partnership.
2. I have reviewed the foregoing Quarterly Handset Penetration Status Report for the period ending January 31, 2008, and believe it to be true and correct to the best of my knowledge, information and belief.

This declaration is executed on this 31st day of January, 2008.



Gregory A. Maras
Secretary of General Partner
Inland Cellular Telephone Company