

CC Docket No. 94-102 – Status Report

Filed by: Keystone Wireless, L.L.C.
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Date: November 3, 2008

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By Electronic Submission:

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STATUS REPORT
November, 2008
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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:

Keystone has received Phase I and/or Phase II requests from all nine of the PSAPs in its market, and has completed installation of its Phase I deployments in all nine counties in its market. All of the Phase I installations in Keystone’s market are using NCAS solutions with Intrado as the central hub, which is a requirement for moving to the Phase II E-911 deployment.

Keystone and Essential Management Services, LLC (“EMS”), Keystone’s liaison with the various PSAPs and the State of Pennsylvania, 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. 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, neither 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, nor any PSAP has expressed any concerns or issues with respect to Keystone’s Phase II E-911 implementation efforts.

EMS also continues to work with PEMA regarding Keystone’s Wireless 9-1-1 Cost Recovery Plan (“CRP”), which was initially submitted to PEMA in March of 2007, revised in November of 2007 (CRP 2007/2008), and again in March of 2008 (CRP 2008/2009). As previously reported, PEMA granted partial approval of Keystone’s CRP 2008/2009, but advised that the approved funds will not be available to wireless carriers in this fiscal year (all funds having been committed to PSAP’s). Thus, funding is pending the availability of funds in fiscal year 2009/2010. In light of this delay, Keystone has explored other funding sources, but given the current economic climate, has been unsuccessful in securing alternative funding. EMS is

continuing to assist Keystone with its communications with the PEMA and with keeping the PSAPs in Keystone's market advised of the status of the PEMA funding for Keystone's Phase II deployment.

Implementation of Phase II Service:

As previously reported, Keystone has been working with Polaris Wireless to come up with a network-based Phase II solution for its market, and has taken preliminary steps in the process of negotiating a contract for this Phase II solution. Final negotiations have been postponed until PEMA makes a commitment respecting the funding for Keystone's Phase II deployment or Keystone finds other funding. Since its last Status Report, Keystone has had further discussions with Polaris Wireless to explore the possibility of structuring a payment plan over several years, but to no avail. Upon receipt of a commitment of funds from the PEMA and the execution of a definitive agreement with the manufacturer of the Phase II solution, Keystone will be able to schedule a final market study, which will determine the exact Phase II solution to be deployed in Keystone's market. Keystone hopes to be able to commence Phase II deployment late in either the second or third quarter of 2009.

Even when Keystone implements the network-based Phase II E-911 solution, which utilizes triangulation techniques, it will not reach the requisite 67% and 95% accuracy requirements prescribed by §20.18(h)(1) or (2) of the Commission's rules at the PSAP level in all parts of the licensed area, because only a portion of Keystone's service area is susceptible to triangulation techniques. Keystone's service area is very rural or less densely populated and the cell sites are spread far apart. However, Keystone expects to meet the Commission's requirements in the core population areas of the market. Thus, Keystone probably 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 constructed one new cell site in its market, which provides coverage to areas of its market not previously covered. Keystone is in the process of completing construction of another new cell site that it anticipates will be completed in the first quarter of 2009.