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Federal Communications Commission
Office of the Secretary

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: Amendment of E-911 Phase II Implementation Plan Report

WT Docket 94-102

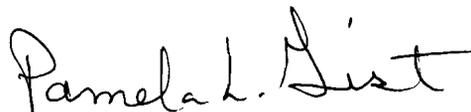
Cross Wireless, L.L.C.
Form 499 Filer ID Number 821696

Dear Ms. Dortch:

On behalf of Cross Wireless, L.L.C., and pursuant to Section 20.18(i) of the rules of the Federal Communications Commission, submitted herewith is the company's amended E911 Phase 2 implementation plan.

Should any questions arise with respect to this matter, please communicate directly with this office.

Very truly yours,



Pamela L. Gist

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CROSS WIRELESS, L.L.C.

WT Docket 94-102

Amended E-911 Phase II Implementation Plan Report

FCC Rule Section 20.18(i)

Background/Contact Information

(1) Carrier Identifying Information

Cross Wireless, L.L.C.
Form 499 Filer ID No. 821696

(2) Contact Information

John C. Ruhl, Wireless General Manager
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E911 Phase II Location Technology Information

(1) Type of Technology

Cross Wireless, L.L.C. (“Cross Wireless”) provides wireless services using GSM digital technology. Deployment of CDMA2000 as an overlay of the GSM network in Cross Wireless’ service area will commence as part of an ongoing effort to adapt to current market conditions and to provide customers a more extensive roaming environment.

In the new CDMA service area Cross Wireless will utilize a handset-based solution to make available Phase II E911 services, with support services provided by Intrado. So long as Cross Wireless continues to operate the legacy GSM system, Phase II location data for 911 calls made on GSM handsets will be provided to PSAPs via Cross Wireless’ legacy network-based technology and support services provided by Polaris.

(2) Testing and Verification

Cross Wireless will review and evaluate the test results, accuracy and accompanying technical information provided by Intrado, the selected vendor of E911 equipment, services and software. Cross Wireless will assess testing and verification methods and procedures of the new system based on sound engineering and statistical practices, referring to the principles and standards set forth in OET Bulletin 71 and any updates thereto. Testing and verification will be incorporated into routine procedures once the handset-based solution is in service.

(3) Implementation Details and Schedule

- Cross Wireless expects to implement handset-based Phase II services on the CDMA network during the fourth quarter of 2010. All digital handsets deployed on the CDMA system will have automatic location identification capability.
- Cross Wireless will notify the FCC of any substantial change in its schedule for CDMA implementation and deployment of the handset-based location technology.

(4) PSAP Interface

Cross Wireless will continue to work with each PSAP to mutually determine the best method of delivery of Phase II information and utilization by the PSAP. Cross Wireless will deploy the necessary hardware and software to timely deliver the Phase II information to PSAPs to assist their use of the information delivered by Cross Wireless' handset-based E911 network solution.

(5) Existing Handsets

Cross Wireless' handset-based solution will provide enhanced ALI information immediately upon commencement of implementation. All handsets deployed on the CDMA network will be location capable. Calls made from existing GSM handsets will be routed by the networked-based E911 solution presently in place for the GSM network.

(6) Location of Non-Compatible Handsets

911 calls initiated on handsets that are incompatible with either of Cross Wireless' technology solutions will continue to be delivered to the PSAP with E911 Phase I information.

(7) Other Information

Cross Wireless remains dedicated to implementation of E911 Phase II ALI capabilities that comply with the Commission's accuracy requirements to the greatest degree technically possible.