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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

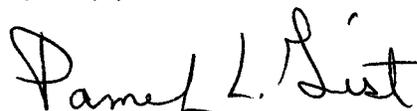
Cellular Network Partnership, An Oklahoma Limited Partnership
d/b/a Pioneer Cellular
Form 499 Filer ID No. 801762

Dear Ms. Dortch:

On behalf of Cellular Network Partnership, An Oklahoma Limited Partnership d/b/a Pioneer Cellular, 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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**CELLULAR NETWORK PARTNERSHIP, AN OKLAHOMA LIMITED
PARTNERSHIP
d/b/a PIONEER CELLULAR**

WT Docket 94-102

FCC Rule Section 20.18(i)

Supplemental E-911 Phase II Implementation Plan Report

Pursuant to the Commission's wireless enhanced E911 rules, this document serves as a supplemental report on Implementation Plans of Wireless E911 Phase II Automatic Location Identification for Cellular Network Partnership, An Oklahoma Limited Partnership d/b/a Pioneer Cellular.

Background/Contact Information

(1) **Carrier Identifying Information**

Cellular Network Partnership, An Oklahoma Limited Partnership
d/b/a Pioneer Cellular
Form 499 Filer ID No. 801762

(2) **Contact Information**

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E911 Phase II Location Technology Information for CDMA

(1) Type of Technology

Pioneer Cellular provides wireless services using CDMA digital technology. Pioneer Cellular has acquired Cellular Station KNKN607 serving Cellular Market Area 600 - Oklahoma 5 B1 - Roger Mills ("OK 5 B1"), where wireless services have been provided using GSM digital technology. Pioneer Cellular has chosen to deploy CDMA2000 in OK 5 B1 as part of an ongoing effort to integrate the new network into the existing network, adapt to current market conditions, and provide customers a more extensive roaming environment.

In the CDMA service area of OK 5 B1 Pioneer Cellular will utilize a handset-based solution to make available Phase II E911 services, with support services provided by Intrado. For as long as the legacy GSM system is active in OK 5 B1, Phase II location data for 911 calls made on GSM handsets will be provided to PSAPs via legacy network-based technology and support services provided by Polaris.

(2) Testing and Verification

Pioneer Cellular will review and evaluate test results and accompanying technical information provided by Intrado, the selected vendor of E911 equipment, services and software. Pioneer Cellular will assess testing and verification methods and procedures of the OK 5 B1 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

Pioneer Cellular expects to complete implementation of handset-based Phase II services on the OK 5 B1 CDMA network within thirty days. All digital handsets deployed on the CDMA system will have automatic location identification capability.

(4) PSAP Interface

Pioneer Cellular will work with each PSAP in the OK 5 B1 service area to mutually determine the best method of delivering the new handset-based Phase II information and utilization by the PSAP. Pioneer Cellular 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 Pioneer Cellular's handset-based E911 network solution.

(5) Existing Handsets

Pioneer Cellular's handset-based solution will create a Phase II capability that will provide enhanced ALI information immediately upon commencement of implementation in OK 5 B1. 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.

(6) Location of Non-Compatible Handsets

Pioneer Cellular will employ a handset-based solution in a manner that will ensure that E911 calls placed on handsets that are not compatible with the handset-based solution will be delivered to the PSAP with E911 Phase I information within any PSAP area that is Phase I capable. 911 calls initiated on handsets that are incompatible with either of Pioneer Cellular's technology solutions will continue to be delivered to the PSAP with E911 Phase I information.

(7) Other Information

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