

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:)
)
Revision of the Commission’s Rules)
To Ensure Compatibility with) CC Docket No. 94-102
Enhanced 911 Emergency Calling Systems)
)
Phase II Compliance Deadlines for Non-)
Nationwide CMRS Carriers)

August 2, 2004 Quarterly Report

QWEST WIRELESS, LLC
AUGUST 2, 2004 IMPLEMENTATION STATUS REPORT

Introduction and Summary

Qwest Wireless, LLC (“Qwest Wireless”)¹ submits this quarterly E911 Phase II Implementation Status Report, and appended Affidavit, as required by the Federal Communications Commission’s (“Commission”) *Phase II Stay Order*.² In that *Order*, the Commission granted extensions of E911 Phase II network upgrade and interim handset deployment deadlines to Tier II and Tier III wireless carriers and established quarterly reporting requirements for affected carriers.³ The purpose of these reports is to provide specific and

¹ This filing is submitted on behalf of Qwest Wireless. The report includes the activities for the former TW Wireless, LLC which, as of February 19, 2004, was merged into Qwest Wireless. Prior to the merger, TW Wireless, LLC was a wholly-owned subsidiary of Qwest Wireless. Qwest Wireless provides broadband Personal Communications Services (“PCS”) in a number of markets.

² *In the Matter of Revision of the Commission’s Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems – Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers, Order to Stay*, 17 FCC Rcd. 14841 (2002) (“*Phase II Stay Order*”).

³ *Id.* at 14850 n.45.

verifiable information to the Commission so that it can better monitor Tier II carriers' progress on E911 wireless deployment and compliance with the Commission's requirements.⁴

Status of Phase I and Phase II Requests

Attached as Appendix A, Qwest Wireless provides detailed information regarding its Phase I and Phase II deployments in the standardized form wireless carriers have been directed to use in DA 03-1902.⁵ Appendix A provides information on all the Public Safety Answering Points ("PSAPs") in Qwest Wireless' region with respect to 911/E911 activity where Qwest Wireless has been involved in some fashion.

With respect to both Phase I and Phase II requests, Qwest Wireless has deployed all valid requests received to date within a six-month period, with the exception of deployment requests that Qwest Wireless has renegotiated with PSAPs or where there have been delays associated with the PSAP or its serving local exchange carrier ("LEC"). Appendix A identifies in the "Reason" column all deployments where Qwest Wireless has currently suspended deployments. Where the reason for the deployment delay is a PSAP request or a delay associated with a LEC deployment, Qwest Wireless will proceed with the deployment once the matters between those parties are resolved.

Handset Based Solution Benchmark Status

In its *Phase II Stay Order*, the Commission required Tier II wireless carriers to "begin selling and activating" ALI-capable handsets starting March, 2003, further requiring that all handsets sold and activated be ALI-capable by May 31, 2004.⁶ Qwest Wireless met this

⁴ *Id.* at 14851 ¶ 31.

⁵ *Public Notice, Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation*, 18 FCC Rcd. 11420 (2003).

⁶ *Phase II Stay Order*, 17 FCC Rcd. at 14849 ¶ 27.

benchmark in advance of the May date. Beginning April 2004, Qwest Wireless began selling and activating only ALI-capable handsets. The next handset benchmark established by the *Phase II Stay Order* is December 31, 2005. By that time, carriers must ensure that the penetration of location-capable handsets among its subscribers reaches at least 95%. At this time, Qwest Wireless has no reason to expect it will not reach that benchmark as well.

Respectfully submitted,

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APPENDIX A

In Appendix A, Qwest Wireless has sorted the PSAP information as follows: Phase I requests are provided first, followed by the Phase II requests. Within each of those categories, PSAP requests that have been deployed are identified first; those awaiting deployment are presented second with relevant reasons for delayed deployments provided.

APPENDIX B

AFFIDAVIT

I, Carol Miller, Vice President-Network Operations, have reviewed the attached Qwest Wireless, LLC August 2, 2004 Implementation Status Report required by the Federal Communications Commission. I attest, under the penalty of perjury, that it is true and correct to the best of my knowledge.

/s/ Carol Miller

August 2, 2004