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November 9, 2000

VIA COURIER

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
TW-A325
Washington, DC 20554

Re: **Report of Amarillo License, L.P. and High Plains Wireless, L.P. on Plans for Implementation of Wireless Enhanced 911 Phase II Automatic Location Identification (ALI) Systems; CC Docket No. 94-102**

Dear Ms Salas:

On behalf of Amarillo License, L.P. ("Amarillo License") and High Plains Wireless, L.P. ("High Plains"), we hereby submit their Plans for Implementation of Wireless Enhanced 911 Phase II Automatic Location Identification Systems in CC Docket No. 94-102.

Background/Contact Information

1. Carrier Identifying Information:

   Carrier Name: Amarillo License, L.P.
   Carrier TRS Number: 804507[1]

   Carrier Name: High Plains Wireless, L.P.
   Carrier TRS Number: 819746

[1] Amarillo License does not serve any customers or have any revenues. All service is provided by and revenues are received by its parent company Amarillo CellTelCo. Therefore, Amarillo License does not have a TRS number, and the TRS number of Amarillo CellTelCo is provided. However, the Commission's list of TRS numbers erroneously shows the name as Amarillo Cellular Telephone Company. Amarillo Cellular Telephone Company is a fictitious name. The correct legal name is Amarillo CellTelCo.

2. The name, title, address, telephone number, facsimile number and e-mail address of the person or persons responsible for the carrier report.

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Title: Technician
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E911 Phase II Location Technology Information

1. Type of Technology: Identification of the Phase II location technology(ies) that the carrier plans to deploy across its service territory, *e.g.*, network-only, handset-only, hybrid or a combination thereof. Please also include a complete description of the technology(ies) that is/are chosen and the name of the corresponding vendor or vendors. Indicate what technology will be used in each individual area of the carrier's service territory.

Amarillo License, L.P. ("Amarillo License") and High Plains Wireless, L.P. ("High Plains") will utilize throughout their service areas Geometrix system architecture and technology developed by Grayson Wireless, a division of Allen Telecom, Inc. ("Allen Telecom"). Geometrix is a network overlay wireless caller location system that provides E911 Phase II compliant caller location information in response to commands initiated by Amarillo License's and High Plains' wireless network. The command is initiated each time a customer dials 911. A Geometrix system consists of two types of components: Wireless Location Sensors ("WLS") and the Geolocation Control System ("GCS"). A WLS unit is installed at each base station in Amarillo License's and High Plains' network. The WLS units are precise RF measuring devices which, under the control of the GCS, analyze and measure voice channel signals from mobile stations calling 911. The GCS unit, centrally located at a wireless network Mobile Switching Center ("MSC"), is connected to each of the remote WLS units by a DS0 facility in order to initiate location activities at the WLSs and to receive measurements from them. The GCS analyzes the information received from the WLS units, computes the locations of wireless 911 callers, and forwards these locations to Public Service Answering Points (PSAPs) via a Mobile Positioning Center ("MPC"). The MPC is the same MPC that was established pursuant to E911 Phase I implementation. In addition to its system control, analysis, and communications functions, the GCS monitors the Geometrix system, collects and summarizes system operational data, and initiates alarms in the event of system problems.

All Geometrix WLS units employ precise Time Difference of Arrival ("TDOA") measuring and analysis techniques to determine wireless 911 caller locations. In addition, in some rural applications where base station spacing is extreme, selected WLS units in a Geometrix system may have their TDOA capability supplemented with Angle of Arrival ("AOA") analysis. In such cases, TDOA and AOA work in conjunction with each other to produce precise location of emergency callers. TDOA applications, by far the most prevalent in a typical Geometrix system, require passive connection of WLS units to existing host wireless network antennas at the base station. AOA

applications may require replacement of existing antennas with calibrated panel antenna units. All Geometrix systems employ powerful proprietary processing to achieve outstanding improvements in gain and multipath mitigation.

2. Testing and Verification: A description of the testing method used, or to be used, to determine the accuracy of the ALI solution(s) selected, and a description of the results of tests already conducted. Note: the Commission provided guidelines for determining accuracy of ALI solution in OET Bulleting No. 71, issued April 12, 2000. Copies of this bulletin can be downloaded from the Commission's Web site, at http://www.fcc.gov/oet/info/documents/bulletins/.

Geometrix has been rigorously field-tested. The field-testing has been performed with Geometrix WLS units installed at host wireless network base stations and connected to in-service host wireless network antennas. All test calls have been made from a wide variety of commercially available subscriber handsets operating in their normal mode and with their standard antennas. Similarly, the wireless networks hosting the tests have been operated in their normal manner, including full power control. All Geometrix-determined positions have been compared with Differential GPS ("DGPS") at the test points, or precise measurements to the test points from the nearest point where a DGPS position could be obtained. In conjunction with installing Amarillo License's and High Plains' location system, Allen Telecom will test the systems as described above.

3. Implementation Details and Schedule: A complete description of the carrier's strategy and schedule for the installation of the hardware and software needed to implement its chosen technology (handset-based, network-based or hybrid systems). For example, indicate whether both hardware and software changes will be necessary and fully describe the precise nature of the changes. In addition, please provide the roll-out schedule for the installation of the ALI technology(ies).

Geometrix systems are designed for simple and rapid implementation. Geometrix is compatible with existing Phase I Mobile Positioning Centers (MPCs), connects with MPCs by means of a standard TIA J-36 E-5 interface, and receives and responds to all location requests over this link. Amarillo License and High Plains have already implemented E911 Phase I. Therefore, no further hardware or software changes will be required of Amarillo License's or High Plains' wireless network, except for those few cell sites that would need antenna upgrades for AOA measurements. Amarillo License and High Plains will deploy the Geometrix system to provide Phase II 911 enhanced service to at least 50 percent of its coverage area or 50 percent of its population beginning October 1, 2001, or within 6 months of a PSAP request, whichever is later; and to 100 percent of its coverage area or 100 percent of its population within 18 months of such a request or by October 1, 2002, whichever is later.

4. PSAP Interface: A description of hardware and software changes necessary to transmit Phase II data to PSAPs and the carrier's strategy and schedule for the installation and/or modification of such hardware or software changes.

The Geometrix system does not connect directly with PSAPs. All exchanges between Geometrix and PSAPs take place through the MPC. Thus, the interface with PSAPs is determined by the MPC, as are any PSAP hardware or software changes required to support this interface.

5. Existing Handsets: A description of the carrier's strategy and schedule for the upgrade and/or replacement of existing customer handsets, if applicable.

Since Amarillo License and High Plains will be deploying network-based solutions for E911 Phase II, and Geometrix works with all existing handsets in use by Amarillo License's and High Plains' customers (including roamers), no modification or replacement of handsets is required.

6. Location of Non-Compatible Handsets: A description of the best efforts that carriers employing a handset-based or hybrid system will take to accommodate handsets that are incompatible with the carrier's ALI system, *e.g.*, handsets that do not have ALI capability, or handsets that are ALI - capable, but are not compatible with the carrier's particular handset-based or hybrid system.

Because Amarillo License and High Plains will be deploying network-based solutions, there are no handsets capable of operating on Amarillo License's or High Plains' system that will be non-compatible.

7. Other Information: Please provide any information, including a description and history of any Phase II requests received from PSAPs, that will assist the Commission and affected parties in monitoring and coordinating the deployment of E911 Phase II in accordance with the timetables set forth in the Commission's rules.

Amarillo License and High Plains have not received any PSAP requests for Phase II implementation.

Please address any inquiries regarding this matter to the undersigned.

Respectfully submitted,

Eliot J. Greenwald
James W. Ferguson

cc: Jay Whaley, Policy Division
Sue Parrish

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