Before the

Federal Communications Commission

Washington, D.C. 20554

In the Matter of	)	
	)	
Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems	)	CC Docket No. 94-102
	)	
Phase II Implementation Report	)	

To: The Commission

KODIAK WIRELESS, LLC
REPORT ON ENHANCED 911 PHASE II IMPLEMENTATION

Pursuant to Section 20.18(i) of the Commission's rules, 47 C.F.R. § 20.18(i), Kodiak Wireless, LLC ("Kodiak"), hereby submits its report on plans for implementing Phase II enhanced 911 ("E911") service.[1] The information provided herein is responsive to the requirements set forth in the Commission's rules and is organized in accordance with the guidance provided in the Wireless Telecommunications Bureau's Public Notice of September 14, 2000.[2]

BACKGROUND/CONTACT INFORMATION

(1) Carrier Identifying Information

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[1] Kodiak is the cellular licensee in the A2 portion of the Alaska 2 - Bethel RSA.

[2] Public Notice, *Wireless Telecommunications Bureau Provides Guidance on Carrier Reports on Implementation of Wireless E911 Phase II Automatic Location Identification*, CC Docket No. 94-102, DA 00-2099 (rel. Sept. 14, 2000).

As Kodiak commenced initial operations of its cellular system in Kodiak, Alaska on October 18, 2000, it has not been subject to FCC Form 499 filing obligations to date, and therefore it does not yet have a TRS number.

(2) Contact Information

Correspondence or other inquiries regarding the instant report should be addressed to the following persons:

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E911 PHASE II LOCATION TECHNOLOGY INFORMATION

(1) Type of Technology

Kodiak is a new entrant to the wireless arena with a cellular license to serve the A2 portion of the Alaska 2 - Bethel RSA, which commenced operations on October 18, 2000. Due to the rural nature of its service area, Kodiak implemented an analog system network for its cellular operations. Based on current technology and vendor representations, Kodiak intends to test and implement a handset only technology to meet its E911 Phase II cellular location requirement. As a result of its research, Kodiak has determined that given the current rural

nature of the area where it is providing service, the ALI-capable handset solution will provide the best method for implementing 911 location abilities into its system. Further, given the topology of Kodiak's service area, mountainous with large valleys and a portion of the Pacific Ocean, accurate triangulation cannot be used in the area. The ALI-capable handset technology will use a GPS chip located in the handset which will broadcast Latitude and Longitude information back to the cellular switch on either of the location channels associated with Kodiak's cellular system or over the control channel under certain adverse system conditions. Kodiak understands that most major handset vendors will include this technology in their handsets in the near future. It is Kodiak's understanding that the ALI-related equipment that will be provided by Kodiak's switch provider, Nortel, will be capable of detecting the coordinate information as part of a 911 call and format it for delivery to the PSAP. Kodiak reserves the right to change its plan and select an alternative ALI technology, as permitted under the Commission's rules.[3]

As noted above, given the rural nature and the topology of its service area, Kodiak has determined that the use of ALI-capable handsets is the best approach to meeting its Phase II obligations. However, based on current information from vendors, it is possible that the ALI-capable handsets necessary to implement a handset-based solution may not be available in time to comply with the October 1, 2001 deadline for carriers to initiate the sale of such handsets to customers.[4] Kodiak will use every effort to meet the October 1 deadline, assuming the handsets are available. However, in the event that the handsets are not available in time for the October 1, 2001 deadline, Kodiak will reassess its options, given the particular nature of its service area.

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[3] *See Third Report and Order*, 14 FCC Rcd. 17388, ¶ 89 (1999).

[4] *See* 47 C.F.R. § 20.18(g)(1)(A).

(2) Testing and Verification

As previously mentioned, Kodiak recently began operations on October 18, 2000, thus there has been no testing or verification of handset accuracy within Kodiak's system. Testing will commence as soon as the handsets and network software and hardware are available. Test methods will follow the guidelines provided in OET Bulletin No. 71. Additionally, it is Kodiak's understanding from its vendors that the necessary network equipment will be available by 3Q2001. Kodiak will implement the necessary equipment in its system once it is made available.

(3) Implementation Details and Schedule

In order to implement its handset-based solution, Kodiak will need to install certain hardware and software components into its network system. Kodiak's cellular switch will require a software addition in order to read ALI information originating with the handset and reformat that information as required by the PSAP. Based on information provided by its vendor, such equipment will tentatively be available in 3Q2001. Kodiak will begin implementing and testing these hardware and software upgrades as soon as they become available.

(4) PSAP Interface

Where a PSAP requests Phase II service, Kodiak will implement software and hardware for Phase II functionality and test the Phase II service to verify end-to-end E911 Phase II functionality. PSAPs will capture the emergency call Calling Line ID and then access a database for the location of the calling line. Kodiak notes that the requesting PSAPs themselves will need to upgrade the E911 network, and add a new graphic capable computer capable of displaying a

continuous map of Kodiak's service area. Further, the PSAP will need software that is capable of interpreting the GPS information and accurately displaying the information on a display map.

(5) Existing Handsets

In order to inform its customers of the need to upgrade or replace their existing handsets, Kodiak intends to initiate a program informing its customers of the availability and benefits of GPS capable handsets as soon as its network has been upgraded and the phones are available for sale to the general public. Given the uncertainty regarding when such handsets will become available, and Kodiak's only recent institution of service, further information regarding Kodiak's upgrade program or plans are not available at this time.

(6) Location of Non-Compatible Handsets

In order to accommodate handsets that are incompatible with Kodiak's ALI system or handsets that do not have ALI capability, Kodiak intends to make available for rent to its customers ALI capable and compatible handsets. Additionally, Kodiak will notify all system subscribers of the system handset only configuration and will offer incentives to encourage subscribers to convert to the new technology handsets as soon as possible. Kodiak notes that Phase I location information will still be provided to those callers not using ALI-capable handsets. Further, as requested by the Commission, Kodiak intends to take the necessary steps to ensure that its system is interoperable with ALI systems used by other carriers and conform to general standards that permit to provide 911 ALI for any ALI-capable handset that complies with this general standard.

(7) Other Information

As Kodiak recently commenced operations on October 18, Kodiak has received no Phase II requests from any PSAPs, to date. As to additional information that will assist the Commission and affected parties, such as PSAPs, Kodiak notes that its E911 Phase II obligations are also necessarily contingent on PSAPs being "capable of receiving and utilizing the data elements associated with the service," and having a cost recovery mechanism in place.[5] Kodiak has not been notified as to whether any PSAPs in its markets have met these prerequisites.

CONCLUSION

The instant report is submitted on behalf of Kodiak Wireless, LLC, pursuant to the requirements set forth in Section 20.18(i) of the Commission's rules. Further information will be provided upon Commission request.

Respectfully submitted,

KODIAK WIRELESS, LLC

By: _____

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November 9, 2000

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[5] 47 C.F.R. § 20.18(j).

* Practice limited to matters and proceedings before Federal courts and agencies.