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November 8, 2000

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OFFICE OF THE SECRETARY

WRITER'S CONTACT INFORMATION
(202) 828-5528

Magalie R. Salas, Secretary
Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

Attention: **Patrick Forster, Senior Engineer (3-A104)**
Policy Division
Wireless Telecommunications Bureau

Re: **Knoxville Wireless, L.P.**
Implementation Plans of Wireless E911 Phase II Automatic Location Identification
Notice Pertaining to CC Docket No. 94-102

Dear Ms. Salas:

On behalf of Knoxville Wireless, L.P., we are submitting herewith its Report on Implementation of Wireless E911 Phase II Automatic Location Identification.

Please direct any questions or correspondence regarding this filing to our office.

Very truly yours,

Gerard J. Duffy
Richard D. Rubino

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Attachment

KNOXVILLE WIRELESS L.P.
311 North Chancery
McMinnville, Tennessee 37110

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie R. Salas, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Attention: Patrick Forster, Senior Engineer (3-A104)
Policy Division
Wireless Telecommunications Bureau

Re: Implementation Plans of Wireless E911 Phase II Automatic Location Identification
Notice Pertaining to CC Docket No. 94-102

E911 PHASE II STATUS REPORT

Dear Ms. Salas:

In accordance with the Third Report and Order in Docket No. 94-102 and the Commission's related Public Notice, Mimeo No. DA00-2099 (released September 14, 2000), we hereby submit our report on the status of implementation plans for Wireless E911 Phase II Automatic Location Identification, as follows:

Background/Contact Information

1) Carrier Identifying Information: Knoxville Wireless, L.P.
TRS Number: Not Yet Assigned – Network not constructed or providing service to the public.

2) Contact Information: Gerard J. Duffy, Esq.
Richard D. Rubino, Esq.
Blooston, Mordkofsky, Jackson & Dickens
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E911 Phase II Location Technology Information

Response to Item Nos. 1 – 7.

Knoxville Wireless, L.P. holds the license for Broadband Personal Communications Service station KNLH632. The five-year construction deadline for this license does not expire until April 28, 2002. We have not yet determined the technology that will be used in the build-out of our licensed PCS system, including whether we will use a network based or handset based solution to comply with the E911 ALI Phase II requirement. Once such a determination is made, we will file a supplemental report which will indicate the type of technology, as well as the equipment vendor, timetable for deployment, and program to ensure a successful implementation. Such report will be filed within 30 days of our implementation decision, in accordance with Rule Section 20.18(i). Testing to verify the Phase II capability will be conducted in accordance with the Empirical Testing Method per OET Bulletin No. 71 and the equipment manufacturer's requirements.

Knoxville Wireless, L.P. is owned by various rural telephone companies who serve local exchange areas in rural Tennessee and who will be providing PCS service primarily to rural or non urbanized communities. Because of the higher per pop cost of a rural buildout, and reduced expectation of revenues (due to lower population density), we must be careful in choosing the technology and signaling format that we will use. We have been monitoring the progress of the various Phase II E911 technologies under development, and have obtained, through our consultants, basic information concerning network-based vendors such as Allen Telecom/Grayson Wireless Division, Cell-Loc, Inc./Times Three, Inc., TruePosition, Inc., U.S. Wireless Corp., and XYPOINT Corporation; handset-based vendors such as SnapTrack, Inc. and others such as Motorola, Inc., Nokia and Ericsson. We are also aware of a hybrid approach under development by Focusystems, Inc. Based on this information, we have come to the following preliminary conclusions:

1. All of the above products are still under development, and we expect that all will progress significantly over the next 6 to 12 months. We believe that none of these vendors appears to be ready to promise delivery to smaller carriers of a finished product by October 1, 2001, because the vendors are likely to concentrate on the largest carriers. However, we expect that this situation will change substantially by the time we are ready to deploy Phase II technology, and we therefore believe that progress made in rolling out Phase II capabilities in urban areas will allow us to more rapidly deploy a proven technology in our less populated service area.

2. If we were implementing Phase II today, we would be concerned about the high cost of a network solution, as well as the problems associated with the use of triangulation and similar techniques in a rural setting, where towers are widely spaced and may be separated by uneven terrain. We would likewise be concerned with the sparsity of

pricing and delivery information for handset ALI technology, and the fact that GPS solutions are generally limited by the ability of the handset to have a clear line of sight to the GPS satellite (which may limit the effectiveness of E911 calls made from indoors, heavily forested areas, etc.) Again, we are aware that the manufacturers are addressing all of these issues, and expect that they will be largely resolved by the time we deploy our system and receive a PSAP request for Phase II capability.

In order to ensure that we timely achieve compliance with the Commission's E911 requirements, once we have chosen our overall PCS technology, we will promptly evaluate the status, pricing and availability of all Phase II technologies at that time, and evaluate their effectiveness and feasibility based on the signaling format we have chosen. If we affiliate with other carriers based on our choice of format, the Phase II solution chosen by the affiliated carriers will be factored into our evaluation. We will also consult with industry sources, especially other rural telephone companies engaging in the provision of PCS, to determine which solution works best for rural areas. We will then decide on a vendor and proceed to implement the chosen solution in accordance with the Commission's Rules. It is contemplated that we will use customer mailings, bill inserts, store promotions and similar efforts to make our customers and potential customers aware of the availability and benefits of Phase II capability. Depending on the timing of our activation and related PSAP requests, our system may be Phase II compliant from the initiation of service, in which case it is expected that virtually all customers placed on the system will be Phase II compliant.

Because we have not implemented service, we have not received any PSAP Phase I or Phase II requests, with respect to our PCS system, to date. In this regard, we are aware of no areas of the state within our service area that have deployed E911 Phase I or Phase II.

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Upon the commencement of service to the public and receipt of a PSAP request, we stand ready to implement E911 ALI Phase II. We will remain in contact with our local PSAP, and as necessary will update this report to keep the Commission apprised of our progress.

Respectfully submitted,

KNOXVILLE WIRELESS, L.P.

By Leroy Krombs
Officer of General Partner

Dated: November 7, 2000