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November 9, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

WRITER'S CONTACT INFORMATION
(202) 828-5540

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: **South Central Utah Telephone Association**
Implementation Plans of Wireless E911 Phase II Automatic Location Identification
Notice Pertaining to CC Docket No. 94-102

Dear Ms. Salas:

On behalf of South Central Utah Telephone Association, 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,

John A. Prendergast

John A. Prendergast
Richard D. Rubino

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Attachment

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

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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 Information, as follows:

a. Background/Contact Information

1) Carrier Identifying Information: South Central Utah Telephone Association
TRS Number: **805929**

2) Contact Information: John A. Prendergast, Esq.
D. Cary Mitchell, Esq.
Blooston, Mordkofsky, Jackson & Dickens
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b. E911 Phase II Location Technology Information

South Central Utah Telephone Association ("SCUTA") is a rural telephone cooperative in Escalante, Utah, that was organized in January 1952 with 110 subscribers and incorporated March 1953. Today the Company provides wireline service to more than 14,000 access lines, including

homes and businesses in much of the rural markets of South Central Utah. Those subscribers live in Kane, Garfield, Wayne, Sevier, Piute Counties and western Washington, Iron and Beaver Counties plus Mohave County Arizona. In addition to the wireline services, South Central Communications operates a broadband PCS network operating on the F-Block frequencies in the St. George, Utah Basic Trading Area (BTA392). The system operates under call sign KNLG233.

SCUTA uses Nortel equipment in its wireless CDMA network, and it is therefore largely dependent upon Nortel for the testing and/or approval of Phase II ALI solutions to be used in its network. The St. George BTA encompasses areas served by seven (7) different PSAPs. While 9-1-1 calling capability has been implemented in all of these jurisdictions, none of these PSAPs has requested Phase I or Phase II E911 service. The PSAPs in SCUTA's operating territory are as follows:

Sevier County
Beaver County
Iron County
Washington County
Garfield County
Kane County
Colorado City, Arizona

At the request of the counties listed above, SCUTA's wireline staff has been working with QWEST to consolidate ALI database information that was "split" because of the acquisition of certain landline exchanges by SCUTA from US West (the predecessor in interest to QWEST). The efforts of SCUTA and QWEST, which are discussed more fully below, should facilitate the ability of these entities to utilize E911 ALI data

SCUTA takes its obligation to provide enhanced 911 services seriously and is committed to working with its equipment vendor and the public safety community to make Phase II ALI capability available to its customers as soon as practicable.

1. Type of Technology:

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; and 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.

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.

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 lack 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 wooded 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.

At this stage, SCUTA is inclined to select network-based ALI for its wireless system, due to the unlikely availability of ALI-compliant handsets to smaller carriers. SCUTA has not yet selected a particular vendor of network-based ALI technology. Out of an abundance of caution, we request a waiver of the November 9, 2000 report deadline, to the extent that it can be interpreted as requiring a choice of a particular vendor by that date. As discussed below, no PSAP in our service area is close to being able to use Phase II information.

2. Testing and Verification

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.

3. Implementation Details and Schedule

SCUTA plans to roll out its location technology as soon as the need and a cost recovery mechanism is demonstrated, or within 6 months after an official PSAP request is received, whichever occurs first.

Once a PSAP request has been received, SCUTA plans to adhere to the implementation schedule established by the Commission in the *Fourth Memorandum Opinion and Order* in CC Docket 94-102. Its ability to do so will depend, in large part, on the ability of the equipment manufacturers to have their products operational and delivered on time.

4. PSAP Interface

To date, our area has PSAP interfaces that range from those which have up-to-date software and hardware, to PSAP locations that are still using basic 9-1-1 technology. As noted above, we have not had any PSAP requests for Phase I or Phase II service.

PSAP Name	Provider	Status
Sevier County	PSAP equipment and software provided by QWEST	Appears up-to-date. Software allows 10 – 20 digits of ALI data
Beaver County	PSAP equipment and software provided by QWEST	Will require software upgrade.
Iron County	PSAP equipment and software provided by QWEST	Appears up-to-date. Software allows 10 – 20 digits of ALI data
Washington County	PSAP equipment and software provided by QWEST	Will require software upgrade.
Kane County	PSAP equipment and software provided by QWEST	Will require software upgrade.

Garfield County	PSAP equipment and software provided by QWEST	Still in transition from basic 9-1-1 to E911 service. Addressing and E911 still not fully online.
Colorado City, AZ	PSAP equipment and software provided by QWEST	Expressed interest in QWEST.

SCUTA uses a combination landline and wireless switch to provide service in its territory. SCUTA furnishes 9-1-1 services directly to PSAPs and indirectly through the QWEST tandem which connects to some of the PSAPs. Wireless 9-1-1 service is retranslated and provided to separate directory numbers located at the PSAPs.

1999-2000 Landline ALI Database Consolidation Work: In the past, SCUTA has provided ALI database information for its own service areas. In 1999, SCUTA was faced with significant costs to upgrade its ALI database system, due to various issues with its ALI equipment vendor (Lucent). At the same time, several counties requested that QWEST and SCUTA simplify their operations by operating from one common database and offer them a single company interface for E911 service. SCUTA and QWEST subsequently held meetings with the counties and PSAP personnel and determined that ALI data would transition to the QWEST ALI database, furnished by SCC. SCUTA would then phase out and remove its ALI database and equipment without charging any parties for upgrades to the unsupported Lucent equipment. This ALI database consolidation project is nearing completion, and SCUTA expects the work should finish before the end of the year. We feel this will help to simplify the network and to position better the PSAPs and serving companies when Phase I and Phase II rollout begins.

5. Existing Handsets

Does not apply to network-based solution.

6. Location of Non-Compatible Handsets

Does not apply to network-based solution.

7. Other Information

In order to ensure that we timely achieve compliance with the Commission's E911 requirements, we will consult with industry sources, especially other rural telephone companies engaging in the provision of broadband PCS services, 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.

7. Other Information

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We stand ready to timely implement Phase II E911 service in accordance with the Commission's Rules. We will remain in contact with our local PSAPs, and as necessary will update this report to keep the Commission apprised of our progress.

Respectfully submitted,

South Central Utah Telephone

Association

By

Dated: November 8, 2000