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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

November 9, 2000

Magalie Roman Salas, Secretary
Federal Communications Commission
445-12th St. TW-A235
Washington, DC 20554

Re: *Washington RSA No. 8 Limited Partnership's Report on E911 Phase II Implementation*
(Cellular Market No. s 700B, 388B2, 389B2)

Dear Ms. Salas:

Pursuant to Section 20.18(i) of the FCC's rules, 47 C.F.R. 20.18(i), Washington RSA No. 8 Limited Partnership, the licensee of Washington RSA No. 8, Idaho RSA 1 B2, and Idaho RSA 2 B2, collectively ("WA8LP"), hereby reports its plans for implementing Phase II enhanced 911 ("E911") service.

Please do not hesitate to contact the undersigned with any questions you may have at (202) 783-4141.

Sincerely,

WILKINSON BARKER KNAUER, LLP

By: William J. Sill
Laura A. Schink

Enclosures

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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	)TRS No: 801744

To: The Commission

REPORT ON ENHANCED 911 PHASE II IMPLEMENTATION

Pursuant to Section 20.18(i) of the FCC's rules, 47 C.F.R. 20.18(i), Washington RSA No. 8 Limited Partnership, the licensee of Washington RSA No. 8, Idaho RSA 1 B2, and Idaho RSA 2 B2, collectively ("WA8LP"), hereby reports its plans for implementing Phase II enhanced 911 ("E911") service. This report is responsive to the requirements set forth in the FCC's rules and is organized in accordance with the Wireless Telecommunications Bureau's guidance.[1/]

I. BACKGROUND/CONTACT INFORMATION

A. Licensee Name

Washington RSA No. 8 Limited Partnership

[1/] 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).

B. Contact Information

Correspondence or other inquiries regarding this report should be addressed to:

Gregory A. Maras
Secretary/Director of Engineering
P.O. Box 688
Roslyn, WA 98941
Phone: (509) 649-2500
Fax: (509) 649-3300
Email: gmaras@inlandnet.com

II. E911 PHASE II LOCATION TECHNOLOGY INFORMATION

A. Type of Technology

Based upon current technology and vendor representations received in response to multiple requests for information and requests for proposals WA8LP currently intends to test and implement a handset-based automatic location information ("ALI") technology throughout its service territory. WA8LP reserves the right to change its plan and select an alternative ALI technology, as permitted under the Commission's rules.[2/]

B. Testing and Verification

As the E911 Phase II technology and equipment has not been concretized, WA8LP cannot make a final determination as to what technology and equipment it will use. Thus, WA8LP cannot finalize its verification plans. However, WA8LP intends to verify the performance and operation of any installed ALI solution during installation and commissioning of the technology into the existing network. WA8LP intends to seek vendor participation in the planning and verification testing stages. WA8LP has tentatively concluded that it will be utilizing Nortel as its vendor and is working with Nortel to obtain greater detail on planning and verification stages. Accordingly, on October 16, 2000, WA8LP sent a letter to Nortel requesting

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

information regarding the availability of E911 ALI technology. Unfortunately, to date, WA8LP has not received a response from Nortel. A copy of WA8LP's letter to Nortel is provided as *Attachment I.*

C. Implementation Details and Schedule

WA8LP is currently working within the following timeframe for implementation of an ALI handset-based solution that will comply with the FCC's E911 Phase II directives:

1st Quarter 2001 – Technology evaluation and vendor negotiations for ALI compliant handsets

2nd Quarter 2001 – Technology selection and vendor selection. Equipment orders placed.

3rd Quarter 2001 - ALI installation and commissioning. Verification trials.

4th Quarter 2001 – Compliance with E911 Phase II ALI handset requirements.

It must be noted that WA8LP's timeline is dependent on several external factors, which may impact the success or achievements made. For example, the co-operation and readiness of the local PSAP and the availability date of E911 Phase II compliant equipment will either assure that the deadline is made or missed.

D. PSAP Interface

WA8LP has contacted all of the PSAPs within Washington State and Idaho[3/] to discuss Phase II implementation and will be working with these PSAPs to provide Phase II E911. A copy of the letter that was sent to all the PSAPs, as well as a copy of the two responses WA8LP received, are provided as *Attachment II.* WA8LP intends to implement an ALI solution for its

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[3/] Letters requesting information were sent on October 16, 2000 to the PSAPs of the following counties in Washington State: Asotin, Columbia, Whitman. In addition, letters were sent to the PSAPs of the following Idaho counties: Clearwater, Idaho, Latah, Nez Perce and Lewis. To date, WA8LP has only received responses from the PSAPs in two of these counties.

network that will comply with the Telecommunications Industry Association (TIA) issued interim standard, TIA J-STD-036, Enhanced Wireless 9-1-1 Phase II. The current issue was released in June 2000.

WA8LP will be seeking vendor compliance with this standard for the PSAP interfaces. This standard specifically addresses the requirements of carriers to report position information to emergency services systems, as mandated by the FCC.

E. Existing Handsets

WA8LP has no immediate plans to implement a handset retrofit program to replace existing customer owned non-ALI handsets with ALI compatible handsets. Rather, existing customers will be able to purchase ALI compliant handsets for use with their existing active account. However, to the extent that handset retrofitting is economical and available WA8LP considers it to be an option.

F. Location of Non-Compatible Handsets

WA8LP will use its best efforts to provide location cell site information utilizing Phase I technology. WA8LP will continue to review any vendor's plan for providing ALI information compatibility for ALI non-compatible handsets but at this time has no plans to implement a technology solution for non-compatible handsets. Based upon responses from PSAPs to date, WA8LP believes that by the time the land line networks and the designated PSAP's facilities have been upgraded, the number of non-compatible handsets will be significantly reduced by the introduction of compatible handsets into the marketplace.

G. Other Information

To date, WA8LP has not received any E911 Phase II requests from PSAPs. Presently Phase I discussions are taking place between PSAPs and carriers in Washington State, and Idaho regarding the terms and conditions under which Phase I will be provided.

WA8LP notes that PSAPs must be "capable of receiving and utilizing the data elements associated with the service," and have a cost recovery mechanism in place before WA8LP is obligated to deploy Phase II service in a market.[4/] At this point none of the PSAPs in WA8LP's reliable coverage areas have independently contacted WA8LP nor have the majority responded to WA8LP's letters. Those PSAPs that did respond candidly acknowledged that at this time they are not prepared to request Phase II E911 service due to economic and/or technological constraints (*See Attachment II*).

III. CONCLUSION

As discussed herein, the instant report is submitted pursuant to the requirements set forth in Section 20.18(i) of the FCC's rules. In the event that additional information is requested, WA8LP will consult with FCC staff to discuss appropriate means of ensuring that business proprietary information, is not publicly disclosed.

Respectfully submitted,

By: Gregory A. Maras

Gregory A. Maras
Secretary

November 8, 2000

[4/] 47 C.F.R. § 20.18(j).

ATTACHMENT I

INLAND CELLULAR TELEPHONE COMPANY
Corporate Offices

103 S. 2nd St.
P.O. Box 688
Roslyn, WA 98941
Telephone: (509) 649-2500
Fax: (509) 649-3300

October 16, 2000

Mr. Jim Torbert
Nortel Networks
5405 Windword Parkway
MS 46D-03-C60
Alpharetta, GA 30004

Re: E911 Phase II Reporting Requirements

Dear Mr. Torbert:

Inland Cellular Telephone Company ("Inland") as general partner of Washington RSA No. 8 Limited Partnership and Eastern Sub-RSA Limited Partnership is currently preparing the information required by the Federal Communications Commission ("FCC") in the upcoming Enhanced 911 ("E911") Phase II Carrier Report ("Report"). Under the E911 rules, cellular and other CMRS carriers are required to report their Phase II implementation and deployment plans to the FCC *not later than November 9, 2000.* However, Inland's ability to comply with the FCC's deadline is being hampered by our inability to obtain information from Nortel Networks ("Nortel"). I have previously made several requests of Nortel for the information, but none has been forthcoming. Without an account manager, Inland is not receiving the support that it needs or deserves.

The information which must be provided in the report includes basic information concerning the carrier's Phase II plans, including but not limited to the technology the carrier plans to employ (*i.e.*, network-based, handset-based or hybrid), whether this technology requires replacement or upgrades of any wireless handsets, and how the carrier plans to verify compliance with the Phase II accuracy requirements. More detailed information which must be provided includes the strategy and schedule for the roll-out of the ALI technology, and hardware and software changes needed to transmit Phase II data to PSAPs. For your reference I have attached a copy of the FCC's Public Notice which sets forth the reporting requirements.

As our sole cellular network equipment vendor, Nortel has at its disposal the very information that we must have in order to file the E911 Phase II Report. In general, please provide information concerning the equipment and software we will have to add to our network to support E911 Phase II as well as information concerning the anticipated date upon which Phase II compliant GPS handsets will be commercially available. We also request that you provide information concerning each of the points enumerated in the Public Notice.

If the Partnerships fail to file their E911 Phase II Reports by November 9, 2000, they face the specter of FCC sanctions. We cannot make the filing without Nortel's information. Thus, we must insist that you provide Inland with the requested information by no later than October 23, 2000. Inland is disappointed in Nortel's response to our previous requests for CALEA and E911 Phase II information. While Inland is pleased with Nortel's equipment, a strong business relationship can only be forged if Inland is properly supported by Nortel.

Please send the requested information directly to me at the above address or via e-mail at gmaras@Inlandnet.com or telecopy it to (509) 649-3300.

Sincerely,

Gregory A. Maras | bf

Gregory A. Maras
Secretary
Inland Cellular Telephone Company,
General Partner of Washington RSA No. 8
Limited Partnership and Eastern
Sub-RSA Limited Partnership

ATTACHMENT II

City of Lewiston
IDAHO'S ONLY SEAPORT

POLICE DEPARTMENT 1224 'F' STREET LEWISTON, IDAHO 83501
(208) 746-0171 • FAX (208) 746-6179

October 19, 2000

Gregory A. Maras
Inland Cellular Telephone Company
~~103 S. 2nd Street~~
Roslyn, WA 98941

Gregory:

I received a copy of your letter that was sent to Toni Greer at the Nez Perce County Sheriff's Office. I am working with Bill Reynolds, who is the GIS Specialist for Nez Perce County, on getting E-9-1-1 implemented in the county of Nez Perce.

Currently, we have Basic 9-1-1 for the City of Lewiston dispatch center and Basic 9-1-1 for the Nez Perce County dispatch center. Nez Perce County is completing rural addressing and then we will be moving forward with installing E-9-1-1 equipment for two PSAP locations, one for Nez Perce County Sheriff's Office and the other one at the Lewiston Police Department.

At this time since neither entity is E-9-1-1 we're not ready to implement Phase I or Phase II of E-9-1-1 wireless services.

I hope this information will be helpful to you. Please feel free to contact me with any questions.

Sincerely,

Cindy Felton

Cindy Felton
Computer Specialist
Lewiston Police Department

19 October 2000

Gregory A. Maras
Secretary
Inland Cellular Telephone Company
P. O. Box 688
Roslyn, WA 98941

Roger Trump
Columbia County
E 9-1-1 Coordinator
P.O. Box 5
Dayton, WA. 99328

Dear Mr. Maras:

The following information is in response to your request of 16 October 2000. Our local committee has not yet discussed Phase II and won't until a clear delineation of responsibilities for our needs and equipment have been identified. For that reason, Columbia County has not budgeted for Phase II capabilities.

Columbia County already is using State monies to support the existing system and will need to access additional funding to support any new capabilities. Those funds will be requested when the state and cellular companies are ready to proceed with Phase II.

Columbia County does not have a scheduled date to be Phase II compliant and will not have such a schedule until everything is in place for the County to proceed. In that same responsible manner, we will request Phase II from Inland Cellular when all funding and an estimate of installation of necessary equipment are secured.

Sincerely,

Roger Trump

INLAND CELLULAR TELEPHONE COMPANY
Corporate Offices

103 S. 2nd St.
P.O. Box 688
Roslyn, WA 98941
Telephone: (509) 649-2500
Fax: (509) 649-3300

October 16, 2000

Mr. Roger Trump
Columbia County E911 Coordinator
P.O. Box 5
Dayton, WA 99328

Re: E911 Phase II Reporting Requirements

Dear Mr. Trump:

Inland Cellular Telephone Company ("Inland") as general partner of Washington RSA No. 8 Limited Partnership and Eastern Sub-RSA Limited Partnership is currently preparing the information required by the Federal Communications Commission ("FCC") in the upcoming Enhanced 911 ("E911") Phase II Carrier Report ("Report"). Under the E911 rules, cellular and other CMRS carriers are required to report their Phase II implementation and deployment plans to the FCC *not later than November 9, 2000.* The capabilities of the PSAP are an integral aspect of Inland's deployment schedule and thus your input is essential if we are to provide a full and accurate report to the FCC.

Designated PSAPs ("PSAP") play a pivotal role in the provision of Phase II E911 services to the public. If a carrier modified its system to provide Phase II information to the PSAP and the PSAP is unable to process the information, the public will not have E911 Phase II service. We note that currently, Inland has received a request for Phase I E911 service and that Inland and other carriers are working with King County to determine whether a mutually agreeable Phase I Carrier-PSAP Agreement can be developed.

So that we can provide the FCC with meaningful information concerning the scheduling of our buildout and operation of Phase II E911, we need the following information:

* When have you budgeted the acquisition and buildout of your Phase II capability?

* Have you discussed equipment and software availability with vendors?

* Will this require the approval of additional monies from the State Legislature or a local governmental body? If so, in what fiscal year will those funds be requested?

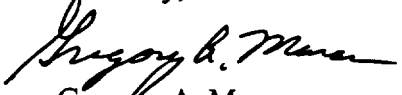
* When do you have scheduled that the PSAP will be Phase II compliant?

* When are you planning to request Phase II Service from Washington RSA No. 8 Limited Partnership and Eastern Sub-RSA Limited Partnership d/b/a Inland Cellular.

The receipt of this information is crucial to Inland's ability to provide a meaningful Report to the Commission. Please provide answers to the above questions no later than-*October 23, 2000*, so that we will have sufficient time to factor in your information and provide the FCC with a thorough Report by November 9, 2000. You may reach me at the above address, via e-mail at gmaras@inlandnet.com or by telecopier at (509) 649-3300.

We appreciate your assistance in providing this important information.

Sincerely,



Gregory A. Maras
Secretary
Inland Cellular Telephone Company,
General Partner of Washington RSA No. 8
Limited Partnership and Eastern
Sub-RSA Limited Partnership