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November 9, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

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

Re: **Montana Wireless, Inc.**
Report on Implementation of Wireless E911
Phase II Automatic Location Identification
CC Docket 94-102

Dear Ms. Salas:

On behalf of Montana Wireless, Inc., we are submitting herewith its report on implementation of a wireless E911 automatic location identification system.

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

Very truly yours,

Harold Mordkofsky

Attachment

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List ABCDE

MONTANA WIRELESS, INC.
1221 North Russell Street
Missoula, Montana 59808-1805

Magalie R. Salas, Secretary
Federal Communications Commission
Washington, DC 20554

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

Re: **Report on Implementation of Wireless E911**
Phase II Automatic Location Identification
CC Docket 94-102

Dear Ms. Salas:

In accordance with the Commission's *Third Report and Order*, in CC Docket 94-102, released October 6, 1999, as modified by the Commission's *Fourth Memorandum Opinion and Order*, released September 8, 2000, we hereby submit this report of our plans for implementing a wireless Enhanced 911 (E911) Phase II automatic location identification (ALI) system, as follows:

Background/Contact Information

1. Carrier Identifiying Information:

   Name of Carrier: Montana Wireless, Inc.
   TRS Number: 818046

2. Contact Information:

   Any inquiries concerning this report may be referred to:

   Harold Mordkofsky
   Blooston, Mordkofsky, Jackson & Dickens
   2120 L Street, N.W.
   Washington, D.C. 20037
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Montana Wireless, Inc. (MWI) is the licensee of station WPOI210 in the Broadband Personal Communications Service (PCS). Station WPOI210 is a license partitioned from the 30 MHz Block A license granted to GTE Macro Communications Corporation (GTE), on June 23, 1995, for the Spokane-Billings Major Trading Area (MTA). On November 1, 1996, the Commission approved the application to partition to MWI a portion of GTE's license for the Spokane-Billings MTA, to include the Missoula and Kalispell Basic Trading Areas (BTAs) and Powell County, from the Butte BTA. MWI utilizes Nortel's CDMA equipment for its PCS network.

E911 Phase II Location Technology Information

1. Type of Technology: MWI presently intends to implement a handset-based solution utilizing Qualcomm's GPS One technology, in conjunction with GTE/Telecommunications Services, Inc.'s (TSI's) PSAP solution. This technology will be used over MWI's entire network.

2. Testing and Verification: Thus far, MWI has not performed any testing. The product described above was only recently released and testing has not been feasible. However, the manufacturers' initial test results indicate that performance will exceed FCC requirements. When the equipment becomes available, MWI will begin testing by first segregating its service area into separate environments: urban, suburban, rural flatland, rural mountainous and areas served by repeaters. Test calls will be placed from various locations, including stationary locations, inside and outside of buildings, and mobile locations. Location information will be compared to handheld GPS readings. Testing will then be arranged with local PSAPs. All testing will be in accordance with the Commission's *OET Bulletin No. 71*, or equivalent methods and procedures.

3. Implementation Details and Schedule: MWI plans to adhere to the implementation schedule established by the Commission in the *Fourth Memorandum Opinion and Order*. 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. MWI has requested location technology status from its handset suppliers. However, none has been able to commit to a schedule.

4. PSAP Interface: MWI will use the services of GTE/TSI, its current SS7 services provider. A data link will be established from MWI's serving signal control point (SCP) to the ALI database serving the local PSAPs, and between the SCP and a local server collecting the results of the location

query. The voice portion will be forwarded to the selective router, as usual. The location will be sent to the ALI database along with the number of the party initiating the E911 call. The PSAP will receive this information over existing data links.

5. Existing Handsets: MWI will continue to keep abreast of its current handset suppliers' location identification deployment plans. These suppliers currently include Nokia, Kyocera and Motorola. MWI's subscribers will be informed beginning in 2001, by way of bill inserts, of the coming availability of ALI-capable handsets and given the opportunity to acquire them when available. Subscribers will also be informed of the December 31, 2005 date by which basically all handsets used must be ALI-capable.

6. Location of Non-Compatible Handsets: Beginning with the October 1, 2001 date for starting to sell and activate ALI-capable handsets, we will tout their advantages to new subscribers and recommend that non-compatible handsets be restricted for use at campus locations, i.e, indoor locations in manufacturing plants and elsewhere where we will be basically providing fixed service. We will use a "best practices" solution in connection with providing ALI to non-compatible handsets, assuming, of course, that the PSAP is equipped to utilize Phase II ALI data. It appears that such solutions are currently in development and, at this stage, MWI is not committed to any particular solution.

7. Other Information: MWI has reviewed a number of options for providing E911 Phase II ALI. Its network supports approximately 3,000 users with plans to grow to 6,000 over the next three years. Geographically, its service area encompasses about 2,500 square miles. These demographics have required extensive use (almost 50 percent) of repeaters. MWI's network architecture and its limited size mandate a handset-based solution as the economical approach to providing Phase II ALI. The use of a network solution would require the addition of costly equipment at each of the base station and repeater locations. The repeater sites are not served by any data transport media. Their locations are, in some cases, so remote that data lines of any type are extremely expensive. MWI has calculated its capital expense for a network-based solution to be between $1.75 million and $2.25 million, which it regards as prohibitive, especially in the absence of any cost recovery mechanism.

As of the present, MWI has not received any PSAP requests for either Phase I or Phase II deployment.

Respectfully submitted,

Montana Wireless, Inc.

By Joan MacDonald
Officer

Dated: 11-8-00