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November 9, 2000

Magalie Roman Salas, Secretary
Office of the Secretary
Federal Communications Commission
445 - 12th Street, SW
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Attn: Patrick Forster, Senior Engineer
Room 3-A104
Policy Division
Wireless Telecommunications Bureau

Re: <u>Texas RSA 15B2 Limited Partnership</u>
<u>d/b/a Five Star Wireless,</u>
Implementation Plan of Wireless E-911 Phase II
Automatic Location Identification
Notice Pertaining to CC Docket No. 94-102

Dear Ms. Salas:

On behalf of Texas RSA 15B2 Limited Partnership d/b/a Five Star Wireless, we are transmitting herewith its Report on Implementation of Wireless E-911 Phase II Automatic Location Identification.

Please refer any inquiries or correspondence in connection with this matter to our offices.

Very truly yours,

Robert M. Jackson

Attachment
cc(w/att): Scott S. Parker, Esq.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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D/B/A FIVE STAR WIRELESS
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P.O.Box 291158
Kerrville, Texas 78029-1158

Magalie Roman Salas, Secretary
Office of the Secretary
445 - 12th Street, S.W.
Washington, D.C. 20554

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

Re: Implementation Plan of Wireless E-911 Phase II Automatic Location Identification Notice Pertaining to CC Docket No. 94-102

E-911 PHASE II STATUS REPORT

Dear Ms. Salas:

In accordance with the Third Report and Order in CC Docket No. 94-102 and the Commission's related Public Notice, Mimeo DA 00-2099, released September 14, 2000, we hereby submit our report on the status of implementation plans for Wireless E-911 Phase II Automatic Location Information ("ALI"), as follows:

Background/Contact Information

1) Carrier Identifying Information:

Texas RSA 15B2 Limited Partnership
TRS Number: 803658

2) Contact Information: Robert M. Jackson
Blooston, Mordkofsky, Jackson & Dickens
2120 L Street, N.W., Suite 300
Washington, D.C. 20037
Tel: 202-828-5515
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E-Mail: rmj@bmjd.com

E-911 Phase II Location Technology Information

1) Type of Technology: At present, we anticipate deployment of a network-based solution, probably employing both Time Difference of Arrival ("TDOA") and Angle of Arrival ("AOA") technologies throughout our single market (consisting of Kerr, Kimble, Gillespie and Kendall Counties in Southwest Central Texas). At present, we have not executed an equipment purchase and installation contract with any manufacturer of ALI equipment. However, we have begun preliminary discussions with several prospective manufacturers, including the Grayson Wireless Division of Allen Telecom. As we are a single-market provider of Commercial Mobile Radio Service, we are not in a position to test several vendors solutions, but must rely instead on data provided by the vendors and our own evaluation of that data, in making a final ALI technology decision.

2) Testing and Verification: Obviously, no testing has been conducted at this time, so no test results exist. We are in the process of preparing a Request for Proposals ("RFP") requesting location technology equipment vendors to propose a "turn-key" system which complies with all applicable requirements of the Commission's Rules. After a selection is made and the equipment installed, we will conduct live call testing from known locations to determine the accuracy and reliability before the system is accepted. It is intended that as part of the "turn-key" contract to provide location technology, the equipment vendor will be required to test the system as installed and certify to us that the system meets the location accuracy and reliability standards.

3) Implementation Details and Schedule: We anticipate issuing our RFP for ALI equipment before November 30, 2000, with a response date of January 10, 2001. We anticipate executing a contract for the necessary location hardware by March 1, 2001, with installation taking place between June 1, 2001 and July 31, 2001. This leaves two months for testing and system adjustment.

It is also anticipated that some software additions to our Lucent VCDX mobile switch will be required. However, to date, Lucent has been unable to provide information as to precisely what will be required.

The current Phase I system in much of the State of Texas utilizes a location database operated by SCC. We anticipate that the Phase II ALI solution will operate similarly using SCC's mapping program. Therefore, we do not anticipate major network revisions to accomplish Phase II ALI deployment.

We plan to adhere to the implementation schedule established by the Commission in the Fourth Memorandum Opinion and Order, released September 8, 2000. However, our ability to do so will

depend, in large measure, on the ability of equipment manufacturers to have their products operational and delivered in a timely manner.

4) PSAP Interface: See Nos. 2 and 3 above as to network and software requirements. Our four-county service area is served by three 911 routing tandem switches, four PSAPs, and three 911 providers. Essentially, each county has its own operating entity. The most populous county, Kerr County, has its own independent 911 district, which has not yet requested Phase I implementation. The other three counties operate through area Councils of Governments in conjunction with the State Commission on Emergency Communications. The implementation for these three counties will be the same, and as referenced above, should not require major network additions beyond those required for Phase I. As to Kerr County, what will be required is unknown at present. However, should Kerr County elect to participate in the state SCC database network, Phase II implementation would be similar to the other three counties.

5) Existing Handsets: Not applicable.

6) Location of Non-Compatible Handsets: Not applicable.

7) Other Information: To date, we have received no requests for Phase II ALI.

Respectfully submitted,

Texas RSA 15B2 Limited Partnership d/b/a Five Star Wireless

Dated: 9/8/2000

By: Scott S. Parker
Scott S. Parker, Officer,
General Partner