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ORIGINAL

November 9, 2000

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

Re: *North Carolina RSA 1 Partnership's Report on E911 Phase II Implementation*

Dear Ms. Salas:

Pursuant to Section 20.18(i) of the FCC's rules, 47 C.F.R. 20.18(i), North Carolina RSA 1 Partnership, ("NC1"), 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
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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. 806509

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), North Carolina RSA 1 Partnership, ("NC1") 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

North Carolina RSA 1 Partnership

B. Contact Information

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

Jeff Ramsey
1185 Russ Avenue
Waynesville, North Carolina 28786
(828) 452-5757

[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).

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 NC1 currently intends to test and implement a handset-based automatic location information ("ALI") technology throughout its service territory. However, NC1 will also continue to explore its options to utilize a network-based solution. NC1 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

Currently, NC1 is considering multiple vendors and reviewing the technology that is available from them. As the E911 Phase II technology and equipment has not been concretized, NC1 cannot make a final determination as to what technology and equipment it will use. Thus, NC1 cannot finalize its verification plans. However, NC1 intends to verify the performance and operation of any installed ALI solution during installation and commissioning of the technology into the existing network. NC1 intends to seek vendor participation in the planning and verification testing stages. As soon as NC1 reaches a decision and selects its vendor, it will work closely with them to obtain greater detail on planning and verification stages.

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

C. Implementation Details and Schedule

NC1 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 NC1's timeline is dependant 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

NC1 will work closely with the PSAPs in its reliable service area to coordinate the implementation, and provide Phase II E911. NC1 intends to implement an ALI solution for its 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.

NC1 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

NC1 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 NC1 considers it to be an option.

F. Location of Non-Compatible Handsets

NC1 will use its best efforts to provide location cell site information utilizing Phase I technology. NC1 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. NC1 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

NC1 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 NC1 is obligated to deploy Phase II service in a market.[3/] To date, NC1 has not received any E911 Phase II requests from PSAPs. Nor does it anticipate receiving any in the near future. Currently, NC1 is working with public safety officials on the implementation and provision of Phase I E911.

[3/] 47 C.F.R. § 20.18(j).

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, NC1 will consult with FCC staff to discuss appropriate means of ensuring that business proprietary information, is not publicly disclosed.

Respectfully submitted,

By: _____
Jill Ramsey
Treasurer

November 8, 2000