DOCKET FILE COPY ORIGINAL

PATTON BOGGS LLP
ATTORNEYS AT LAW

2550 M Street, NW
Washington, DC 20037-1350
202-457-6000

Facsimile 202-457-6315

RECEIVED

JAN 10 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

January 10, 2001

Janet Fitzpatrick Moran
(202) 457-5668
jmoran@pattonboggs.com

VIA COURIER

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, DC 20554

94-102

Re: Gap Cellular, L.C. – E-911 Phase II Implementation Report

Dear Ms. Salas:

GAP Cellular, L.C. ("GAP"), by its attorneys, hereby submits its E911 Phase II Implementation Report. An original, four (4) paper copies, and a diskette copy of this report are enclosed.

GAP notes that its cellular system began service on November 20, 2000, and therefore it was not operational on the November 9, 2000 deadline for E911 reports. Further, GAP has recently temporarily taken its system out of service until permanent interconnection arrangements, currently scheduled to be deployed on January 21, 2001, can be implemented.

If you have any questions regarding this matter, please call me at the number above.

Sincerely,

Janet Fitzpatrick Moran

Janet Fitzpatrick Moran

enclosures

cc: Wendy Austrie (hand delivered)
David Kaufman, Esq.
J. Michael Rhoads
ITS (diskette copy)

RECEIVED

JAN 10 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

E911 Phase II Implementation Report

Gap Cellular, LC ("Gap") hereby submits its report on its plans for implementing Phase II enhanced 911 service, pursuant to Section 20.18(i) of the Commission's Rules, 47 C.F.R. §20.18(i); the Commission's *Fourth Memorandum Opinion and Order*, FCC 00-326, released September 8, 2000, in CC Docket No. 94-102; and *Public Notice*, DA 00-2099, released September 14, 2000, in CC Docket No. 94-102.

Carrier Identifying Information:

Name/Address: Gap Cellular, LC
16 W. 127th - 83rd Street
Burr Ridge, IL 60521

TRS Number: Not Available1

Contact Information: Brian Schuchman, E911 Technical Liaison
16 W. 127th - 83rd Street
Burr Ridge, IL 60521
Tel.: (630) 986-9898
Fax: (630) 325-7251
E-mail: brian@commnetwireless.com

E911 Phase II Location Technology Information:

Type of Technology:

Gap intends to employ a handset-based solution. At this time, it does not appear that any practical network-based solution will be commercially available to carries of Gap's size and scope. Gap is a small operator, too small to purchase its equipment directly from manufacturers. Gap usually purchases equipment from wholesale distributors, and intends to acquire handsets employing ALI technology from a wholesale distributor. Gap intends to use whatever ALI-capable handsets are available from the wholesale distributor.

Implementation; Existing Handsets; Schedule:

In the initial phases of the deployment schedule, the use of handset-based ALI technology will: (i) require Gap's current customers to replace their handsets with more expensive ALI-capable handsets, if they want the enhanced 911 service, and (ii) require new customers to purchase more expensive handsets employing ALI technology. In the later phases of the deployment schedule, when the interim penetration benchmarks increase significantly, the

1 Gap began operation of its cellular system in late 2000. Since Gap was not operational in June, 2000, it was not required to file TRS or FCC Form 499 reports, and has not been assigned a TRS number.

use of handset-based ALI technology will, in all probability, require handset upgrades as well.

One of the wholesale distributors with which Gap regularly does business advises that it expects to have one ALI-capable handset model available by the latter half of 2001, but that it will not have any other ALI-capable handset models available before 2003 or 2004. This wholesale distributor also advises that the handsets available in 2001 will be very expensive.

Gap intends to comply with the FCC's penetration benchmarks. However, Gap also anticipates that ALI-capable handsets will be made available to larger operators first, and that the wholesale distributors will have only limited supplies of ALI-capable handsets. Thus, there may not be a sufficient supply of ALI-capable handsets to meet Gap's needs. If and when other E911 equipment becomes available, Gap will consider acquiring same.

If Gap is required to make any changes in its implementation plans, it will notify the Commission of same within thirty days of the adoption of any changes, as required by Section 20.18(i) of the Commission's Rules.

Testing and Verification:

Gap intends to verify conformance with the Phase II accuracy requirements by acquiring handsets that the manufacturers represent are accurate within the limits specified by the Commission's Rules. Gap will rely on information received from its wholesale distributors that provides some assurance that the manufacturers are offering ALI-capable handsets that comply with the accuracy rules. Additionally, Gap intends to follow the guidelines in OET Bulletin No. 71 for determining the accuracy of its ALI solution.

Location of Roamers:

Gap should be able to provide incoming roamers the same location information it provides to its own customers with ALI-capable handsets, provided such incoming roamers have handsets that employ CDMA and ALI technology. Even if Gap is not able to find the exact location of a roamer, it should, at least, be able to locate the cell site with which the roamer is connected.