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FEDERAL COMMUNICATIONS COMMISSION
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FCC MAIL ROOM

6 April 1993

Before the Federal Communications Commission
Washington, D.C. 20554

92-76

In the Matter Of

Amendment of the Commission's Rules	)	CC Docket 92-76
to Establish Rules and Policies Pertaining	)	
to a Non-Voice, Non-Geostationary	)	
Mobile Satellite Service	)	

COMMENTS OF
THE INTERAGENCY COMMITTEE ON SEARCH AND RESCUE
(ICSAR)

1. BACKGROUND

The Interagency Committee on Search and Rescue (ICSAR) is made up of seven federal agencies having search and rescue (SAR) responsibilities under the United States National Search and Rescue Plan. The FCC is a member of the ICSAR and has certain regulatory and operational SAR obligations which should align FCC concerns with those of ICSAR. In reference to the subject NPRM ICSAR requests the FCC to note:

- The great importance of emergency communications to search and rescue (SAR),

- That there has been no suitable substitute for Emergency Locator Transmitters (ELTs) and Emergency Position Indicating Radio Beacons (EPIRBs); this proposed rule making would seem to offer a substitute or supplemental system,

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• The proposed non-voice, non-geostationary orbit mobile satellite service (NVNG MSS) offers the potential to greatly improve emergency communications to benefit SAR and disaster response operations,

• That the effectiveness for the NVNG MSS to contribute to the SAR and Disaster Response Efforts is dependent upon the degree to which the NVNG MSS is compatible with existing SAR networks.

2. COMMENTS

ICSAR endorses the FCC position that the regulations and policy suggestions recommended by the pre-rulemaking advisory committee are in the best interests of the public. However, ICSAR believes the location and routing for distress messages need to be further detailed. In addition, it is essential that the new services being proposed provide interoperability with the existing SAR response capabilities by utilizing the PSDN communications interface.

ELTs and EPIRBs are DISTRESS beacons. Accident conditions under which a distress beacon is intended to operate dictate that an immediate SAR response is needed. Time is absolutely critical in saving survivors.

The NPRM indicates that the NVNG MSS terminals might be used as an emergency signaling device similar to the way in which the ELTs and EPIRBs operate. This could provide several advantages over the present ELT/EPIRB system including the availability of 2-way communications and improved detection & location coverage.

Failure of the NVNG MSS system providers to properly address the distress location, message routing and communications interoperability could result in misrepresentation to the public on what they can expect when an NVNG MSS terminal is used in distress situations. The system providers need to establish a mechanism for routing distress messages to the responsible authorities utilizing the PSDN network.

3. ICSAR RECOMMENDATIONS

ICSAR recommends approval of the subject rule making with the proviso that the providers specifically address how to:

a. Determine the grid coordinates of the distress signal.

b. Determine the appropriate SAR response organization according to type of user (e.g. aircraft, ship or individual) and location (e.g. AFRCC, Coast Guard,State Police, County Sheriff, etc.)

c Route the distress message to the responsible organization.

d. Design the communications interface with Search and Rescue Organizations to utilize the PSDN.

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