

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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MAR - 2 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

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In the Matter of )  
 )  
Amendment of Part 22 of the Commission's )  
Rules to enable a cellular telephone user ) CC Docket No.  
effective and reliable access to 911 service ) 94-102

COMMENTS OF THE  
AD HOC ALLIANCE FOR PUBLIC ACCESS TO 911  
OPPOSING CERTAIN PROVISIONS OF THE "CONSENSUS AGREEMENT"

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## Summary

The Ad Hoc Alliance for Public Access to 911 (the "Alliance")<sup>1</sup>, is the only representative of consumers in this proceeding. In this filing, the Alliance urges the rejection of that part of the proposed "Consensus Agreement," that would allow carriers to limit access to 911 emergency service only to "service initialized mobile radio handset in a home service area or a subscribed-to roamed service area... ." (Page 5, provision entitled "9-1-1 availability") To accept this "Agreement" may well represent the first official sanction of a limitation on access to 911 service by the public.

The Alliance by petition for Rule Making filed on October 27, 1995, asking the Commission to amend Section 22.923 to require all cellular carriers to connect promptly all 911 calls without precondition. The Alliance also asked that the Commission require

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<sup>1</sup> The members of the Alliance are: Alliance for Technology Access, Arizona Consumer League, National Consumers League, World Institute on Disability, National Emergency Number Association - California Chapter, Crime Victims United, Justice for Murder Victims, California Cellular Phone Owners Association, Florida Consumer Fraud Watch, Center for Public Interest Law, Consumer Action, Consumer Coalition of California, Consumers First, California Alliance for Consumer Protection, Californians Against Regulatory Excess, The Office of Communication of the United Church of Christ, Utility Consumer Action Network, Children's Advocacy Institute and Honorable Donald Vial (past president of the California Public Utilities Commission).

that all newly constructed mobile and portable stations be equipped to scan all of the cellular telephone control channels assigned to both System A and to System B and select and use the channel with the strongest signal whenever a 911 call is placed. The Alliance petition was put out for comment and reply comments and has since been consolidated into the instant docket.

To accept the industry negotiated "Consensus Agreement" would be, in effect, to deny the Alliance's petition. The record, however, provides no technical or factual basis for doing so. The fact that at least one of the nation's leading cellular providers, GTE Mobilnet, already provides free, unrestricted access to 911 to all callers, is *prima facie* evidence that the Alliance proposal is feasible. It is also clearly in the public interest. To approve the proposed "Consensus Agreement" provisions on this issue would, therefore, be arbitrary and capricious.

At the heart of the opposition to the Alliance seems to be the fear by the cellular providers that they will lose revenues from broader and improved public access to 911 emergency services. The Alliance does not object to public or user funding of 911 services for cellular 911 services. We suggest the possibility of a 911 fee attached to the sale of each hand set. If there are to be any public funds given to wireless carriers, these funds should be

offset against the profits reasonably expected to be made from other uses of the 911 equipment and technology. Any charges for this access should not include air time charges and be limited to the actual incremental cost of using the cellular system together with any costs incurred by PSAPs in connection with handling cell calls.

The Alliance believes that the public safety institutions that have signed onto this Agreement are misguided. Our best interpretation of their complicity in the industry effort to restrict public access to 911 is that they have been squeezed by the industry into a trade-off of the public interest in unrestricted 911 access for consensus on other issues, especially funding questions for infrastructure improvement.

The Commission's responsibility is to the public. The issue is simply this: Should a consumer who dials 911 on a cell phone always be connected? The answer as a matter of policy clearly is yes. The question then is: Are there any other reasons that this cannot be achieved? The record in this proceeding is devoid of any evidence of other reasons, and indeed, it is already being accomplished by many carriers.

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**COMMENTS OF THE  
AD HOC ALLIANCE FOR PUBLIC ACCESS TO 911  
OPPOSING CERTAIN PROVISIONS OF THE "CONSENSUS AGREEMENT"**

The Ad Hoc Alliance for Public Access to 911 (the "Alliance")<sup>2</sup> by counsel, hereby submits these comments opposing certain provisions of the "Consensus Agreement" between wireless industry representatives and certain public safety groups. The Alliance urges the FCC to reject that part of the agreement which allows cellular carriers to restrict access to 911 service. (Page 5, "9-1-1 availability (Par. 41)")

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<sup>2</sup> The members of the Alliance are: Alliance for Technology Access, Arizona Consumer League, National Consumers League, World Institute on Disability, National Emergency Number Association - California Chapter, Crime Victims United, Justice for Murder Victims, California Cellular Phone Owners Association, Florida Consumer Fraud Watch, Center for Public Interest Law, Consumer Action, Consumer Coalition of California, Consumers First, California Alliance for Consumer Protection, Californians Against Regulatory Excess, The Office of Communication of the United Church of Christ, Utility Consumer Action Network, Children's Advocacy Institute and Honorable Donald Vial (past president of the California Public Utilities Commission).

The Alliance filed a Petition for Rule Making on October 27, 1995. That Petition was placed on public notice on November 13, 1995 and consolidated with Docket No. 94-102. The Alliance petition asks the Commission to amend Section 22.923 of the Commissions Rules to require all cellular carriers to promptly connect all 911 calls without precondition. The Alliance also proposed that the Commission amend Part 22, sub part K, paragraph 22.933 by supplementing OET Bulletin No. 53 to require that all newly constructed mobile and portable stations be equipped to scan all of the cellular telephone control channels assigned to both System A and to System B and select and use the channel with the strongest signal whenever a 911 call is placed.

On February 16, 1996 the Commission asked for additional comment concerning the so called "Consensus Agreement" filed on February 13, 1996 by the Cellular Telecommunications Industry Association (CTIA), National Emergency Number Association (NENA), Association of Public-Safety Communications Officials (APCO), and National Association of State Nine One One Administrators (NASNA). That portion of the "Consensus Agreement" entitled "9-1-1 availability (par. 41)" on page 5, if adopted, would defeat the Alliance proposal and permit cell carriers to continue to refuse to provide access to 911 service to the public at large.

The Alliance is the only representative of consumers in this proceeding. The Alliance was not invited to participate in the discussions that lead up to the "Consensus Agreement", and therefore appreciates this opportunity to comment and respectfully submits the following:<sup>3</sup>

I.

**Prompt, unrestricted and efficient access to the Nation's 911 system is in the public interest and the provisions of the "Agreement" restricting such access should not be approved.**

The invaluable contribution to the public health and safety of 911 service to the country is beyond question, and the growing contribution of cell phone use to reach 911 is widely recognized and encouraged.

We do not intend to reargue each element of our previous filings. We incorporate them by reference in this submission.<sup>4</sup> We believe the issue here is whether every consumer who has a cell phone ought to be able to reach 911 when the number is dialed on

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<sup>3</sup> In its Public Notice the Commission said "Commentators are invited to address any legal, factual, or policy issues associated with the request to adopt the Consensus Agreement." The Alliance has not been included in the negotiations between the industry and public safety agencies. Indeed, it was not even served a copy of the Agreement at the time it was filed with the Commission. The Alliance urges the Commission to use its good offices to encourage the industry and government agencies to include the Alliance in its discussions. Clearly the users of cell phones have the greatest interest in the issues at stake in this proceeding.

<sup>4</sup> Petition for Rule Making filed on October 27, 1995, Reply Comments of the Alliance, filed on, January 16, 1995, and Supplemental Reply Comments filed on February 2, 1996.

that cell phone. The record before the Commission in this proceeding is clear not only that it is in the public interest, but that the industry itself has promoted the use of cell phones as a public safety matter.

Indeed, the promotional efforts of communities, public service agencies and carriers to encourage the use of 911 have been very successful. Exhibit 4 to CTIA's letter of February 12, 1996 to Chairman Reed E. Hunt is a CTIA brochure entitled "The Vital Link".<sup>5</sup> This brochure promotes the use of cell phones for emergencies, crime and "help when you need it". The brochure quotes Chairman Hunt as saying "We have become reliant on wireless phones for personal and community safety." It goes on to state "Wireless phones can prove a VITAL LINK to the police or highway patrol. Every month 600,000 callers report burglaries, car jackings, drunken drivers, and other dangerous situations."

In its news release<sup>6</sup> describing the "Consensus Agreement", CTIA acknowledges that:

"Two-thirds of today's wireless telephone subscribers say they bought their phones for safety and security reasons. Nine out of 10 people polled by the Gallup organization as part of Motorola's Wireless Impact survey said their wireless phone makes them personally feel more safe and secure. And 90 percent said they are more willing to lend a helping hand to a stranger now that they have a wireless phone."

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<sup>5</sup> Appendix A hereto.

<sup>6</sup> Appendix B.

The Alliance believes that the carriers free use of that spectrum for enormous profit carries with it a public service obligation that should prevent carriers from requiring that a person be pre-subscribed to a service before having access to 911 service. Responsible carriers agree with the Alliance position. We have the good example of GTE Mobilnet which already provides free, unrestricted access to 911 to all callers and is affirmatively working to properly route emergency calls in all of its service areas.<sup>7</sup> Other carriers are also acting responsibly -- some are not. For example, in Chicago all emergency 911 calls from "unauthorized" roamers are blocked by Ameritech and Cellular One<sup>8</sup>. BellSouth is also blocking in Miami and Nashville. These examples are only a few instances of blocking.

Why the difference in attitude between carriers? We think that the very clear answer is GTE Mobilnet (and other like minded carriers) are content with the substantial profits they already receive from their cell service and that they recognize their public service obligation not to gouge the public or deny service in emergency situations.

In light of this evidence, it is inconceivable to the Alliance that the Commission would sanction restrictions on the use of 911

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<sup>7</sup> See GTE Mobilnet Comments, December 15, 1995.

<sup>8</sup> In Chicago, Ameritech brands its cellular service as American Radio, Cellular One service is provided SBC Corporation.

by the public. Yet, that is precisely what the Commission will do if it approves the entire "Agreement."

The question is how much should the public pay to support the rapidly growing use of wireless access to this critical emergency service? The "Consensus Agreement" suggests at page 3:

"[i]n moving to Phase II, a cost recovery mechanism is needed to fund both carrier (wireless and wireline) and PSAP investment in E9-1-1 technology and 9-1-1 cost of service. This could be in the form of public appropriations or bond issues, with or without a separate 9-1-1 subscriber line fee (e.g. 75 cents a month), which carriers would be compensated at customary rates to collect." (Emphasis added).

Assuming that \$.75 is a reasonable sum to apportion between PSAP and carrier for cost of service, and assuming that five years is the useful life of a cell phone, then \$37.88 represents the discounted net present value<sup>9</sup> of the required contribution. Compare this amount with the monthly cost of cell service<sup>10</sup> which a consumer must now buy in order to obtain access to the nation's 911 system in some parts of the country where emergency service to "unauthorized" roamers is denied!

The Alliance has no objection to the public and/or the cell users paying a reasonable fee to cover the cost of 911 service.<sup>11</sup>

However, what should be taken into account with respect to any fee

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<sup>9</sup> Using a discount rate of 7%.

<sup>10</sup> Representative rates may be found in Appendix D,

<sup>11</sup> The Alliance earlier suggested that the cost of 911 service could be attached to the cost of the cell phone, which is now given away by many cell carriers to their subscribers. In this way the PSAP could receive the funds necessary to staff and improve their emergency systems somewhat in advance of the cost of providing those upgrades.

paid to cell carriers is that they have received the use of billions of dollars worth of the public's spectrum for free!

We submit that CTIA's cold and callous demand that 911 users be subscribers to their systems is incredibly brazen. The carriers have been reaping enormous profits from selling access to this country's 911 emergency services and that practice should be stopped now!<sup>12</sup>

## II.

**APCO, NENA & NASNA have apparently been misled and/or pressured to accept the provision in the "Consensus Agreement" that would block emergency 911 calls from "unauthorized" roamers.**

What is apparently not understood is that useful ANI cannot be made available in all cases. The CTIA solution to this problem is to block emergency calls from all callers except those from cell subscribers located within their home service areas and "authorized" roamers.<sup>13</sup>

**(a) Scare tactics are being used to mislead public safety organizations into believing that E911 rules will not be adopted unless the Cellular Industry demands are met.**

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<sup>12</sup> The Alliance is concerned that there is a hidden agenda on the part of the industry in their effort to gain FCC approval of their restriction on access to 911. Specifically, we are concerned that should the Commission approve the "Agreement," the cellular industry would use it as a shield against liability in those cases where consumers reasonably attempt to use a cell phone to reach 911 in an emergency, fail to reach it because service is blocked, and they suffer significant injury or loss of property as a direct result. The Commission should not be a party to such a scheme.

<sup>13</sup> An "authorized" roamer is one who has subscribed to roaming service and there is an agreement between his carrier and the carrier where he is located to accept service.

In its opposition to the Alliance position, CTIA stated "[e]ven though CTIA and its members support the goal of broadening the availability of enhanced 911 ("E911")), the two proposals advanced by the Alliance, if adopted, will actually thwart this goal."<sup>14</sup> The stated reason given for this inane statement is PSAPs need call back capability if the caller is disconnected. The lack of call back capability in all cases is not a factor that will "thwart" "the availability of 911." This is a pure and simple misrepresentation intended to cause the public service agencies to fear that no E911 technology will be available unless they agree to the restriction of all 911 service to "authorized users."<sup>15</sup>

On February 6, 1996, the attorneys for APCO filed a letter to Chairman Reed Hundt that discussed a survey of PSAP managers conducted by APCO and NENA on January 12 - 14, 1996.<sup>16</sup> A little less than 40% of those surveyed responded. The results show that approximately 10% of all 911 calls originate from wireless phones.

Question 8 asked the respondents to place a check mark in boxes in front of statements representing "potential" 9-1-1/PBX or Centrex

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<sup>14</sup> Comments dated December 15, 1995, page i.

<sup>15</sup> In the instance of an "authorized roamer" all that can be passed to the PSAP is the caller's long distance number. In order to reach that caller, the PSAP would have to either dial the long distance number and hope that the caller had activated "follow me" service or dial the local access number and then the long distance number. It is far more likely that the caller will call be if the call is dropped -- a simpler and quicker result. The same is true of "unauthorized" roamers.

<sup>16</sup> Attached as Appendix C. A copy of the survey, summary of the results and list of comments from the respondents was attached.

problems. Seventy-three per cent checked "Lack of info on precise location of the caller has led to delays in emergency responses." Question 10 is the same type of question concerning "potential cellular/PCS 9-1-1 problems"<sup>17</sup> however, the question concerning ALI was omitted. Fortunately, the respondents to the survey were given the opportunity to add remarks to their response and 17 took the time to make comments. Over 65% of the commentators indicated that the lack of ALI was a problem but only 12% indicated a need for ANI<sup>18</sup>. No where is the question asked "Do you want the cell carriers to block emergency calls when ANI information is not available?" The answer is obvious -- of course not!

In the "Consensus Agreement", APCO/NENA/NASNA say that they are willing to accept ALI information that is only accurate 70-75% of the time.<sup>19</sup> The important point is that the PSAP wants and needs as much information as possible to respond to emergencies. The same is true of ANI. This does not mean that some emergency calls should be blocked until or unless ANI is available 100% of the time.

As further evidence of scare tactics, see the cover letter for the survey which was signed by both Executive Directors of APCO and NENA. It states in part "We have now learned that two or three

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<sup>17</sup> Page 4 of the summary. Emphasis added.

<sup>18</sup> These percentages are a little misleading on such a small scale however, since APCO/NENA used that approach we did the same.

<sup>19</sup> Page 2, par. 3.

factors are threatening to significantly delay and, perhaps, threaten the very issuance of these rules [implementing E911] (more likely the PBX/Centrex portion of the rule) in an FCC 'Report and Order' document" in CC Docket 94-102. Two of the factors were related to government shutdowns. The third factor "is a recent volley of pressure being applied on the Commission by those for profit organizations who would rather not have these rules or any effective rules in place."

Nothing is said in this cover letter about wireless communications. Nothing appears in the Commission's *ex parte* files that would give rise to these concerns except a presentation by Multi-Media Telecommunications Association arguing for an exemption for small PBX systems.<sup>20</sup> Yet we do not doubt that this concern is genuine.

**(b) Stalling tactics of the wireless industry coupled with increasing cell telephone traffic is forcing public service agencies to accept CTIA terms and conditions**

The bread and butter argument that props up an unjustified refusal to begin to implement new technology is "more study, more time" is needed before such technology can be deployed. APCO and NENA first took steps in late 1992 to force the Wireless Industry to put new technology in place to assist the PSAP in providing the

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<sup>20</sup> Filed on February 15, 1996 under cover of a letter from attorney Robert F. Aldrich. See Appendix C.

best emergency service available.<sup>21</sup> In April of 1994, William Stanton, Executive Director of NENA was quoted as saying "Technology can be developed to solve those [ALI] problems but research by wireless industry has lagged, Stanton said: "Some blame the public safety industry for that. We didn't do anything and now we see the train coming down the tracks.'"<sup>22</sup> Since 1994, the number of 911 cell calls has increased from approximately a half million calls per month to nearly 50,000 calls per day. Clearly this increase in volume when coupled with the fear that no rules will be adopted covering the deployment of E911 technology (particularly ALI) placed the public service agencies under enormous pressure to accept the "Consensus Agreement."

Obviously, the Wireless Industry has been stonewalling in order to create this pressure and thereby achieve some economic benefit for cell carriers. In June 1994, the State of California and APCO commissioned a study of location systems and technology by C.J. Driscoll & Associates.<sup>23</sup> Based in part on this study, the Personal Communications Industry Association (PCIA) and NASNA, NENA and APCO issued an Emergency Access Position Paper which recommends a migration path for 911 caller location. This position paper was

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<sup>21</sup> See comments submitted to the Commission by these entities in the proposed rulemaking for personal communications services. **These comments emphasized the need for PCS to provide Automatic Location Information!**

<sup>22</sup> WIRELESS INDUSTRY GRAPPLES WITH CONCERNS ON 911 INCOMPATIBILITY, *Common Carrier Week*, April 4, 1994.

<sup>23</sup> The study, entitled "Survey of Location Technologies to Support Mobile 911" was released in 1994.

submitted to the Commission in 1994 as the positions of these organizations.

In its reply comments, filed March 17, 1995, BellSouth said it was skeptical of the Driscoll study finding that ALI, accurate within 125 meters, could be available within 5 years.<sup>24</sup> PCIA stated that location information to this degree of accuracy is at least 8 years away.<sup>25</sup> Now we are told, in the "Consensus Agreement", that "[t]he Wireless Industry will achieve, during new Phase II -- no longer than 5 years from the FCC's adoption of rules -- the ability to locate, in latitude and longitude, a wireless caller within 125 meters . . ."<sup>26</sup> **In fact,** "[T]he PSCs believe some vendors can meet **now** the new Phase II requirement . . . and that others will achieve this level of performance will in advance of 5 years."<sup>27</sup>

The "Consensus Agreement" also provides that the Wireless Industry will "immediately" provide ANI. The Wireless Industry has always had the ability to send ANI where local landline has signaling capacity. In Rochester, New York and Seattle, Washington the cell carriers are already sending ANI information to the PSAP. Why the delay?

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<sup>24</sup> Page 4.

<sup>25</sup> PICA Comments at 16, 20.

<sup>26</sup> Page 4 of the "Consensus Agreement".

<sup>27</sup> Page 2 of the "Consensus Agreement", fn 3. Emphasis added.

The foregoing illustrate the sad fact that some regrettably reluctant carriers will stall and delay the implementation of new technology unless and until it suits their own economic interests without regard to the public interest. This very same attitude forms the basis for the opposition to the Alliance petition.

### III.

#### **The importance of selecting the strongest signal in 911 situations**

It seemed obvious to us that two carriers, with different cell sites, covering 90% of their service area, would have locations where one would provide coverage and the other did not. Such gaps in coverage are especially critical for portable cell phones which are operating on cell systems designed for mobile telephone use. Approximately 70% of all new cell phone sales are portable units. A mobile cell phone operates at approximately five times the transmission power of a portable unit. Thus, in areas of weak coverage a mobile unit may be able to communicate with the cell system whereas the portable cannot.

The display on all cell phones indicates the signal strength of the nearest cell transmitting site. The public does not understand that this signal indicator does not represent the power of the cell telephone. Thus, especially in the instance of portable users, the ability of a cell phone to communicate with the cell site may have little to do with the signal level shown on the

cell phone display. As a result, users may not understand that they may not be able to place an emergency call in spite of the "in service" display on their cell phones. Given the enormous importance of prompt placement of 911 calls, it also seemed evident to the Alliance that cell phones must have the capability of selecting the strongest signal from either carrier.

In order to validate our conclusions we carried out a test in Los Angeles, California on February 22, 1996. Attached as Appendix D are copies of the service area maps and rate sheets given to us by the two Los Angeles carriers --- Airtouch and LA Cellular.<sup>28</sup> Our tests were conducted in the middle of the two service areas. The results are shown in Appendix E.

Our test demonstrated areas where there was dramatic disparity between the signal levels of the two carriers. At some locations a cell call could be completed on one carrier and not on the other. At other locations the situation reversed! The results of this test were even more dramatic than we anticipated and show beyond question that selection of the strongest signal in emergency situations is of crucial important to the public.

#### IV.

**Any compensation to cell carriers for "investment in E911 technology and 911 cost of service" should be balanced against the incremental income to be received by carriers from other uses of this technology.**

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<sup>28</sup> Airtouch and LA Cellular do not block 911 calls!

The "Consensus Agreement" proposes, on page 3 under the heading "Financial and legal liability", that the cell carriers be compensated for the equipment and costs of providing Enhanced 9-1-1 ("E911") service. The Alliance has no quarrel with this proposal as a general proposition. However, it should be noted that the deployment of automatic location information ("ALI") technology will spawn a wide range of new services, in addition to E911. These services include deterring fraudulent use of cell phones, stolen vehicle recovery, roadside assistance, routing travelers to their destinations, home incarceration monitoring and fleet vehicle location. At the end of the day, cell carriers will profit from their investment in E911 technology. Are the non-profit PSAPs or the public going to share in this windfall? Of course not. Thus, we find it somewhat disingenuous for these carriers to ask for public money to build and operate these systems while blocking access to 911.

## V.

### Conclusion

The Commission should reject the provision entitled "9-1-1 availability" on page 5 of the "Consensus Agreement" and should

require open and unimpeded access to the nation's 911 system. Any charges for this access should not include air time charges and should be limited to the actual incremental cost of using the cellular system together with any costs incurred by PSAPs in connection with handling cell calls. The Alliance suggests that such costs be collected in advance at the time a cell phone is purchased. Any public funds given to wireless carriers should be offset against the profits reasonably expected to be made from other uses of the 911 equipment and technology.

It is unthinkable to believe that the first major policy decision by the Commission following the adoption of the new Communications Act would include a provision that limits public access to emergency services. The public interest in unimpeded access to 911 from every telephone, cell phone or other communication device is self evident. We do not say a person at a pay phone must have change to reach 911, yet that is precisely what we are saying about a person who finds him/herself in an emergency with a cell phone that for whatever reason may not be subscribed or authorized to roam in a particular location.

We respectfully request the Commission to reject the provision in the Consensus Agreement, to substitute instead the Alliance position.

Respectfully Submitted

A handwritten signature in black ink, appearing to be 'S. Simon', with a long horizontal flourish extending to the right.

Ad Hoc Alliance for Public Access to 911  
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March 4, 1996

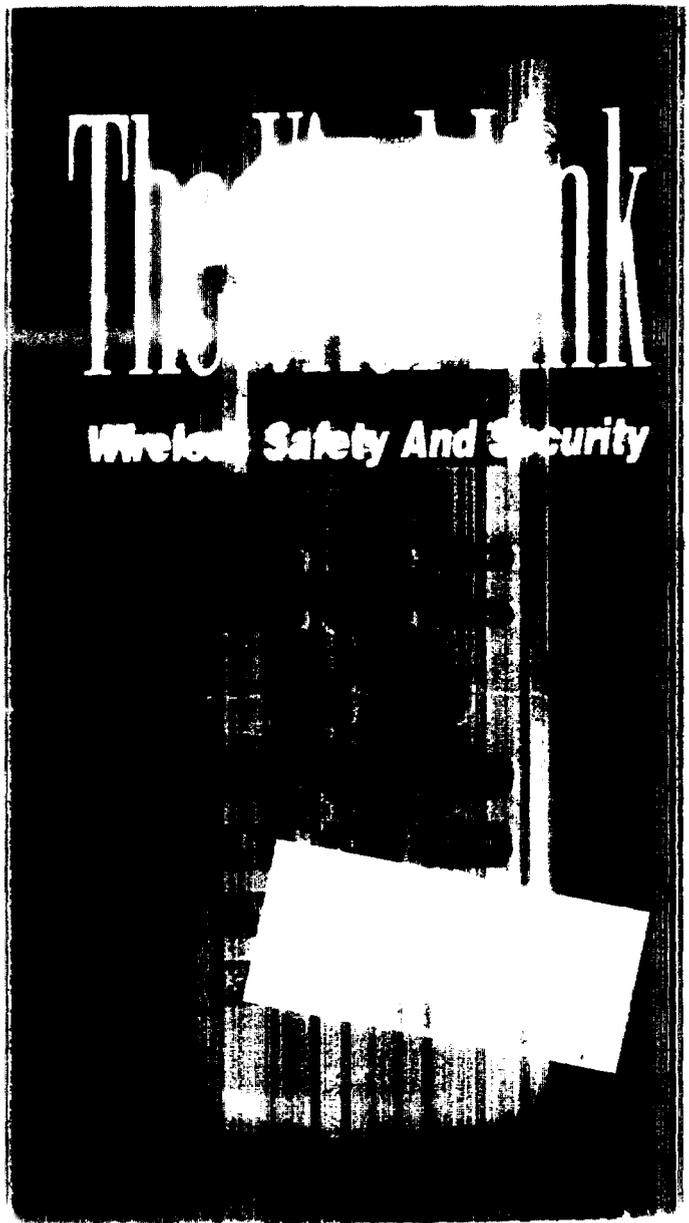
EXHIBIT A  
THE VITAL LINK



Emergency

Non-Emergency

Repair



## THE VITAL LINK — SAFE DRIVING PRACTICES

*Driving safely is your first responsibility.*

— John Andretti, NASCAR star and racing star

To ensure your safety and the safety of others, please remember the following helpful hints:

- Always buckle up
- Keep your hands on the wheel and your eyes on the road.
- Position your phone correctly, within easy reach.
- Use a hands-free phone while driving.
- Use speed dialing.
- When possible, pull off the road or ask a passenger to dial.
- Never take notes while driving.
- For safety, allow voice mail to answer calls.

## THE VITAL LINK — EMERGENCIES

*"Wireless phones are a VITAL LINK for every emergency situation."*

— Angel Rodriguez, Director of Operations for State Civil Defense, Puerto Rico

Emergencies can include a car crash, a breakdown in severe weather, fire, or natural disasters such as earthquakes or hurricanes. Medical emergencies include heart attacks or other conditions requiring immediate expert attention.

Emergencies occur when:

- A life is in danger
- Physical harm has occurred or is threatened.

### Be prepared for an emergency

Record these numbers and the state's emergency numbers before calling your wireless phone. Many locations have special emergency numbers for emergency services. Record these numbers and the state's emergency numbers. Then you will be prepared to provide the following information:

- Your name and wireless phone number
- What happened
- The number of injured victims
- The exact location of the emergency

**Important:** Don't hang up until the operator asks you to end the call.

emergency calls each year. Due to this tremendous volume, emergency operators urge callers to be sure a real emergency exists before calling. If the situation is not an emergency, alert the local or highway patrol on their non-emergency number.

*"The good you do comes back to you in the end."*

Alando Walker, 1995 CTIA Good Samaritan Award Winner, used his phone to call an ambulance for a woman in labor whose car had broken down on I-85 in Atlanta. The baby was safely delivered at the hospital a short time later.

## THE VITAL LINK — CRIME

*"We have become reliant on wireless phones for personal and community safety."*

— Reed Hunt, Chairman, Federal Communications Commission

Wireless phones can provide a VITAL LINK to the police or highway patrol. Every month 600,000 callers report burglaries, carjackings, drunken drivers, and other dangerous situations. Many neighborhood watch groups rely on wireless phones. If you see suspicious behavior or a crime, call your local police or highway patrol.

## THE VITAL LINK — HELP WHEN YOU NEED IT

*"When I get paged, I pull over and make calls. I have to coordinate care for patients, so it's very important that I respond quickly."*

— Mary Mrozinski, Nursing Supervisor,  
Fort Myers, Florida

Use your wireless phone to get help when you or other motorists are stranded. You can alert the highway patrol, call a mechanic, tow truck, or your auto club, and contact loved ones, childcare providers, or business contacts. Remember not to use emergency numbers unless a genuine emergency exists.

Wireless phones can increase your safety and the safety of those around you by providing a VITAL LINK in both emergency and non-emergency situations.

**EXHIBIT B**