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Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20054

Re: Comments of L. A. Urban League Business Development & Information Technology Center in support of Global Stratospheric Telecommunications Service (GSTS) RM-8784

Dear Mr. Caton:

The Los Angeles Urban League Business Development & Information Technology Center has been involved in the evolution of the "information superhighway" and the revolution in the telecommunications industry since December of 1993. We have testified before the NTIA and the California Public Utilities Commission concerning **affordable universal service** and **access** for low income communities and small business.

It has been most disturbing that **access** to the Internet or World Wide Web is **escaping** low income communities and small business because of the **transmission costs**. As a seven year veteran in radio network broadcasting, I am familiar with those costs and can be supportive of alternative means of broadcast transmissions for Internet access.

GSTS will make it possible for small businesses and community-based **organizations** like ours to have "**affordable access**" to the opportunities presented by the Information Age through the Internet and World Wide Web.

We urge you to promptly approve the petition of Sky Station International, Inc. so that communities with the least access can have more access.

Cordially,

Lynne Joy Rogers  
Director

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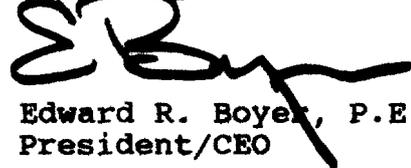
Re: Comments of Mercy Medical Airlift  
RM-8784

Dear Mr. Caton:

Attached are the Comments of Mercy Medical Airlift concerning the petition of Sky Station International, Inc. to establish a Global Stratospheric Telecommunications Service (GSTS).

An original and five copies of the Comments are provided.

Sincerely,



Edward R. Boyer, P.E.  
President/CEO

Attachments

## ADVISORY COMMITTEE

- Joe Gibbs, Chairman  
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- The Honorable Frank R. Wolf  
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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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In the Matter of Amendment of Parts 2  
and 15 of the Commission's Rules to  
Permit Use of Radio Frequencies Above  
40 GHz for New Radio Applications

Petition of Sky Station International, Inc.  
for Amendment of the Commission's  
Rules to Establish Requirement for a  
Global Stratospheric Telecommunications  
Service in the 47.2-47.5 GHz and  
47.9-48.2 GHz Frequency Bands

RM-8784

COMMENTS OF Mercy Medical Airlift.

Mercy Medical Airlift submits these Comments in support of the Petition of Sky Station International, Inc. ("Sky Station") to establish a new Global Stratospheric Telecommunications Service ("GSTS") in the 47.2-47.5 GHz and 47.9-48.2 GHz Frequency Bands. Mercy Medical Airlift urges the Commission to implement promptly appropriate rules for the implementation of GSTS so that this service can be made available to the public as soon as possible. As explained below, the telecommunications services offered by GSTS will serve the public interest by providing the air medical transport and medical-relief community with a superior method of exchanging and accessing critical health care information and communicating operational messages. Mercy Medical Airlift believes, therefore, that GSTS will lead not only to improved health care across the globe, but that it will make a difference in the number of lives saved.

## I. BACKGROUND AND STATEMENT OF INTEREST

Mercy Medical Airlift is an organization that provides, coordinates and manages a nationwide network of charitable air medical transport non-profit charity organizations serving the public good. There are scores of patients moved daily all over the U.S. and reliable, inexpensive telecommunications and position tracking data is an essential component for all operations. Federal Aviation Regulations require that MMA medical and flight crews stay in touch with our Medical Director and dispatch office. The current extremely high price of such remote communications keeps our airborne crews tied to making calls from ground pay phones every time they land - often delaying flights. When our medical crews need physician direction - they must now again find pay phones (as cellular phone won't work because they are landing in different cities and towns). This works very poorly and is frankly unreliable. Mercy Medical Airlift is involved in the transport of nearly 7,000 patients per year. Reliable low-cost communications is essential to our operation.

## II. PUBLIC INTEREST BENEFITS OF GSTS

GSTS will provide the medical community and the medical air transport community with a much needed world-wide, affordable, and reliable communications service. In the medical area, the ability to exchange information quickly and reliably is critical. In some areas, those providing medical assistance

cannot even afford to access such vital information or communicate their needs of situation. Through the low-cost global services provided by GSTS, however, the medical-relief and air medical transport communities will now be in a position to access and to transmit around the world, including to third world countries, life-saving health care information. Such information would include, for example, telemedical diagnoses of injuries and diseases. Further, GSTS will enhance universal emergency rescue and warning services. Thus, GSTS will not only assist the medical relief and air medical transport communities in meeting medical needs and treating illness and disease, but it may, in fact, prevent medical disasters from occurring in the first place.

### III. SUMMARY

In summary, Mercy Medical Airlift believes that the telecommunications service offered by GSTS will enhance international and stateside medical-relief efforts. The interest of the public is best-served by improved and increased exchange of medical information. Mercy Medical Airlift strongly supports the petition of Sky Station and urges the Commission to implement promptly rules for GSTS.

Respectfully submitted,

MERCY MEDICAL AIRLIFT



Edward R. Boyer, P.E.  
President/CEO  
P.O. Box 1940  
Manassas, VA 22110

Date Submitted: April 29, 1996



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Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20054

RE: Comments of the Association of Air Medical Services  
RM-8784

Dear Mr. Caton:

Attached are the Comments of the Association of Air Medical Services and Witness concerning the petition of Sky Station International, Inc. to establish a Global Stratospheric Telecommunications Service (GSTS).

An original and five copies of the Comments are provided.

Sincerely,

A handwritten signature in cursive script that reads "Nina Merrill".

Nina Merrill  
Executive Director

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In the Matter of Amendment of Parts 2 and 15 of the Commission's Rules to Permit Use of Radio Frequencies Above 40 Ghz for New Radio Applications.

Petition of Sky Station International, Inc. for Amendment of the Commission's Rules to Establish Requirements for a Global Stratospheric Telecommunications Service in the 47.2-47.5 Ghz and 47.9-48.2 Ghz Frequency Bands

RM-8784

#### COMMENTS OF the Association of Air Medical Services

The Association of Air Medical Services ("AAMS") submits these Comments in support of the Petition of Sky Station International, Inc. ("Sky Station") to establish a new Global Stratospheric Telecommunications Service ("GSTS") in the 47.2-47.5 Ghz and 47.9-48.2 Ghz Frequency Bands. AAMS urges the Commission to promptly implement appropriate rules for the implementation of GSTS so that this service can be made available to the public as soon as possible. As explained below, the telecommunications services offered by GSTS will serve the public interest by providing the state's manufacturers of goods with a superior method of exchanging and accessing critical information. AAMS believes, therefore, that GSTS will lead not only to improved health care across the globe, but will also make a difference in the number of lives saved.

#### BACKGROUND AND STATEMENT OF INTEREST

The Association of Air Medical Services is an internationally recognized association for providers of air medical transport services. As such, the Association recognizes its responsibilities to its membership and the services provided to their communities. The Association encourages and supports its members in maintaining a standard of performance reflecting safe operations and efficient, high quality patient care.

#### PUBLIC INTEREST BENEFITS OF GSTS

GSTS will provide the medical community and the medical air transport community with a much needed worldwide, affordable, and reliable service. We believe that the GSTS will be extremely valuable to the world public at large through provision of affordable portable broadband Internet and related digital communications. There is nothing else comparable to the GSTS and its low cost and high capacity are remarkable attributes that are the direct result of the innovative placement of stationary platforms in the stratosphere that has not before been practical.

In the medical area, the ability to exchange information quickly and reliably is critical. In some areas, those providing medical assistance cannot even afford to access such vital information or communicate their needs of situation. Through the low-cost global services provided by the GSTS, however, the medical-relief and air medical services communities will now be in the position to access and to transmit around the world, including to third world countries, life-saving health care information. Such information would include, for example, telemedical diagnoses of injuries and diseases. Further, GSTS will enhance universal emergency rescue and warning services. Thus, GSTS will not only assist the medical relief and air medical services communities in meeting medical needs and treating illness and disease, but it may, in fact, prevent medical disasters from occurring in the first place.

#### SUMMARY

In summary, the Association of Air Medical Services believes that the telecommunications service offered by GSTS will enhance international and statewide medical-relief efforts. The interest of the public is best served by improved and increased exchange of medical information. We urge an expeditious approval of the GSTS and the Commission's award of the GSTS applications as a result of the clear benefit to the worldwide public and to industry from this revolutionary new service.

Respectfully Submitted,

Association of Air Medical Services

Nina Merrill  
Executive Director  
35 S. Raymond Avenue, Suite #205  
Pasadena, CA 91105

April 29, 1996