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October 25, 1997
Via Overnight Mail

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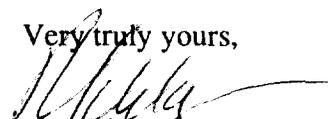
Federal Communications Commission
Secretary of the Commission, Room 202
1919 M. St., N.W.
Washington, DC 20554

EX PARTE OR LATE FILED

To The FCC:

Enclosed please an original of the Ex Parte Reply to Comments from Zoltar Satellite Alarm Systems, Inc. and eight copies. Please distribute them to the Commission and conform and return the cover sheet in the enclosed self addressed stamped envelope. Your attention to this matter is appreciated.

Very truly yours,


RON SCHLAGER

028

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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In the Matter Of)
Revision of the Commission's Rules)
To Ensure Compatibility with)
Enhanced 911 Emergency Calling Systems)

CC Docket No. 94-102
RM-8143

To: The Commission

EX PARTE REPLY TO COMMENTS

Respectfully submitted,

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EXHIBITS

Ira Brodsky, FCC Emergency 911 Mandate: Is It Security Or Is It Surveillance”
RCR, September 1, 1997

Stephania H. Davis “In My Opinion The Business Of Saving Lives” Telephony ,
May 26, 1997

Jon Healey. “Cell Phones As Personal 911 Alarms Win Patent” San Jose Mercury
News , September 16, 1997

George Lurie, “Zoltar Alarms Awarded Patent To Integrate GPS With Wireless”
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Jonathan Marshall, Cell Phones New Role-Emergency Locators, San Francisco
Chronicle, July 22, 1997

Tom McHale, “Digital Market Up--Digital Handset Sales In U.S. Increase 73%”,
Electronic Buyer News, March 10, 1997

Newsbytes News Networks, “Enhanced 911 to Ease Consumer Confusion,”
December 19, 1996.

Duane Noriyuki, Just Think of It as A Big Eye In The Sky Los Angeles Times,
April 27, 1997

Laurence Swasey, “Subscribers Will Pay For E-911”, Wireless Week September 8,
1997

Maura Thurman, “Lost? Doctor Prescribes Cellphone In A Satellite” Marin
Independent Journal, August 4, 1997

EX PARTE REPLY TO COMMENTS

A. INTRODUCTION:

Zoltar Satellite Alarm Systems (hereinafter referred to as "Zoltar") has been awarded a U.S. patent covering the integration of global positioning systems (hereinafter "GPS") with wireless communications for use in personal safety and security devices. The devices covered by this patent can take a variety of forms, all of them small and highly portable. One significant application under the patent is the integration of GPS technology with electronic sensors and wireless phones to create a personal alarm system. Zoltar is an innovator of the technology and supports the development of a E911 system that is functional, versatile and effective to promote the public safety and continue to be useful through the 21st century.

B. REGULATORY OVERVIEW AND ACTION REQUESTED

1. OVERVIEW

The *Report and Order* as promulgated by the Federal Communications Commission (hereinafter referred to as either the "FCC" or "Commission") adopts the following requirements for covered wireless service providers. (Phase I)

First, covered carriers are required to send a call back number and cell segment information to public safety answering points ("PSAPs") within 18 months of the effective date (enacted October 1, 1996) of the *Report and Order*. (Fed. Register Vol. 61, No. 150, p. 40,348-40,352, August 2, 1996.) Phase 1 was to be *initiated* by October 1, 1997 and to have been *completed* within six months.

Second, at the request of a PSAP, covered carriers are required to process and route 911 calls from non-service initialized mobiles.

Third, covered carriers are required to provide access to 911 services to the speech and hearing impaired within 12 months of the effective date of the *Report and Order*.

Fourth, within five years, covered carriers are required to provide PSAPs the longitude and latitude of a wireless caller, accurate to 125 meters in 67 percent of all cases (Phase II)

2. REGULATORY GOAL: In the best interests of the public safety and security the Commission has taken the position that it is necessary to develop and implement a nationwide wireless 911 and E911 system. The Commission proposes to modify the Rule to require greater accuracy by requiring the implementation of a system that utilizes longitude, latitude and altitude that would be able to quickly provide coordinates of the caller's location. This three-dimensional system would replace the two-dimensional system initially covered by the *Report and Order*.

3. ACTION REQUESTED: Zoltar agrees with the regulatory goal and requests that the Commission modify the enforcement so that the rule applies only to new wireless phones.

C. STATEMENT OF GROUNDS AND SUPPORT OF THIS REQUEST

1. *The Report and Order* Should Be Applied To New Cell Phones Only.

A phase in of regulation is consistent with previous Commission policy. In the past, FCC rule making regarding wireless phones has been applied to *new handsets made after the effective date of the regulation*. By analogy, when the FCC required an electronic change, requiring that cell phones select between band A and band B for the purposes of selecting the strongest channel to transmit a 911 call, the rule was applied to *new handsets only* made after the date of the rule.¹ *The Report and Order* will require electronic modification and is expected to last for several decades.

Phased in controls have been utilized in other areas involving technological advances including pollution control, airbags and computer upgrades and compatibility.² This approach appears reasonable and has been commonly applied to regulatory changes so that they can be enacted expeditiously and economically.

¹ 59 Fed.Register 54878 (1994)

² Other areas in which prospective application of a rule applied include air pollution standards from new motor vehicles and new motors fr06jn97R(access gpo.gov) ; passenger equipment safety standards fr23se97P(access gpo.gov), lifesaving equipment fr20my96R(access gpo.gov), Terrestrial microwave fixed radio services fr28my96R(access gpo.gov), telephone number portability fr25jy96R(access gpo.gov), standard design certification for the system 80 + design fr21my97R(access gpo.gov).

2. A Policy Promoting Retrofit of Existing Equipment Should Be Abandoned As A Short Term Solution to A Long Term Commitment.

The enforcement of the current FCC policy seems to favor a "mainframe" solution when wireless handsets are more economical and are looking more like personal computers as consumers are demanding more from the wireless industry. The FCC policy for a "mainframe solution" is estimated by the **Cellular Telephone Industry Association**, of Washington, D.C., to require 130,000 cell sites. This is an increase of almost 100,000 cell sites over the present installed base. All of the cell sites will require specialized equipment at an estimated cost of \$50,000 per site for a total cost as high as \$6.5 billion dollars.³ Due to the frequent resistance of communities to have towers placed in their neighborhoods the build out of a network system could take many years and still leave many holes in the rural areas.

The alternative policy is the implementation of wireless handset solution, which would allow the consumer to upgrade their equipment and take advantage of the bundle of "services" that could be offered. With the rapid technological advances being made with GPS and the appeal of a potential simple elegant solution it would be unwise to issue a mandate that would effectively exclude a handheld solution. **James Lee**, a spokesman for **Qualcomm., Inc.**, a provider of cellular network technology, states "if the solution is simple and elegant the industry may grasp it as a whole."⁴ A handset-based solution to E911 opens the

³Edward Warner, "CTIA Pushing Model E911 Law" **Wireless Week**, June 23,1997, pp. 14

⁴ Maura Thurman, "Lost? Doctor Prescribes Cellphone In A Satellite" **Marin Independent Journal**, August 4, 1997, pp. C-2.

door to a constellation of applications--from fleet management to personal navigation to location based pricing--all under consumer control. The users can initiate a position fix, or request continuous tracking, at the push of a button. GPS is currently being used to help locate mobile phone callers, although such products are not yet available to the public.⁵ In the future, states **Charles Trimble**, chair of the U.S. GPS Industry Council, head of the world's largest manufacturer of GPS equipment, "GPS will further expand its uses."⁶ Such smart terminals would enable the carriers to benefit from data traffic without bearing the burden of infrastructure investment. A handset solution will leave the wireless industry free to offer various combinations of service with E911, enhancing both systems, and allowing the market to determine the best form of the service to be rendered.

3. New Service Options Will Increase Consumer Demand For New Handsets.

Turnover of existing handsets will naturally occur as consumers take advantage of new services offered by the wireless providers. Over 80% of cell phone purchases are made for safety reasons.⁷ Wireless phones are invaluable tools for personal safety but people need to understand that emergency dispatchers do not know the callers' phone number or location. Recent developments and demonstrations for enhanced or E911 services will solve these

⁵ Jon Healey *quoting* Tricia Tan of Trimble Navigation Ltd. "Cell Phones As Personal 911 Alarms Win Patent" **San Jose Mercury News**, September 16, 1997 pp. C-6

⁶ Duane Noriyuki, Just Think of It as A Big Eye In The Sky **Los Angeles Times**, April 27, 1997 pp. E-1.

⁷ Stephania H. Davis "In My Opinion The Business Of Saving Lives" **Telephony**, May 26, 1997

dispatchers do not know the callers' phone number or location. Recent developments and demonstrations for enhanced or E911 services will solve these problems.⁸ Location capable cell phones will replace existing handsets as consumers opt to use E911 services. **Public Opinion Strategies** of Alexandria, Va., commissioned by E911 technology provider **The Associated Group Inc.** of Bala Cynwyd, Pa., reported the following findings:

- Once the public is aware of a cellular phone's limitation in regard to 911 services, interest in location services is created.
- Cellular users and potential users overwhelmingly feel that wireless enhanced location capability is an important and valuable service and they are generally unaware (62%) that 911 operators do not know the caller's location.
- Many existing and potential users said the location service would be seen as a competitive advantage in the marketplace. Overall, consumers were more likely to switch to the carrier that offered the technology.
- According to the report if one carrier offers emergency location service for a mandatory fee and a competing carrier does not offer the service, the carrier offering the location service with a mandatory fee will have a potential net customer gain of 32% if the fee is \$1.00 per month and a potential net customer gain of 25% if the fee is \$1.50 per month.
- With a mandatory monthly fee of \$1.00, 88% of the potential customers would switch toward the service. If there were a mandatory monthly fee of \$1.50, 84% of the potential customers would move to the service.

⁸ Newsbytes News Networks, "Enhanced 911 to Ease Consumer Confusion," December 19, 1996.

- Cellular users and potential users rank the emergency location service as more important than many other features currently offered by carriers, including caller ID, voice mail, paging and digital.

In summary, the survey quantified that consumers *are* willing to pay for the service and providers *will* gain a competitive and economic advantage by offering it.⁹

4. The Commission's Long Range Rule Making Plan Is Best Served By Applying the Current *Report and Order* To New Handsets Only.

Concurrent with the *Report and Order* the Commission proposed new or additional regulations to include a three dimensional location system which provides the longitude, latitude and altitude of the wireless 911 caller within a radius of 40 feet with 90% accuracy. This *Report and Order* is best served by devoting the resources to *new* handsets which will promote investment in a system compatible with the long range goals of the Commission. GPS-equipped phones should be able to pinpoint callers much more accurately than alternative methods and in the future will be able to do so within a range of 15 meters.¹⁰ A policy requiring enforcement of the *Report and Order* on *new handsets* only, allows the Commission to maximize benefits and minimize the capital investment made by the carrier and provide the long range goal of the Commission for a highly accurate locating system.

⁹ Tom McHale, "Digital Market Up--Digital Handset Sales In U.S. Increase 73%", **Electronic Buyer News**, March 10, 1997 pp. 31.

¹⁰ Jonathan Marshall, Cell Phones New Role-Emergency Locators, **San Francisco Chronicle**, July 22, 1997 pp. C-4 quoting Clem Driscoll

Instead of shifting the focus towards the *past* for a short range solution, insuring compliance with the FCC *Report and Order* by requiring the retrofiting of 40 million cell phones, the focus should shift towards the *future*. As GPS does not require further infrastructure changes, it can be incorporated into the millions of digital handsets which are projected to be sold in the United States by the year 2000.¹¹

5. The FCC Enforcement of the *Report and Order* For New Handsets Only Would Be Consistent With The Administration Policy To Have A Civilian System Containing Enhanced Capabilities That Is Compatible With The Existing Military System.

The Global Positioning System was developed as a military navigational tool, first used in Somalia and later in the Persian Gulf, guiding troops and equipment through desert terrain void of geographical reference points. Last year President Clinton issued a directive to bring the accuracy of the civilian code closer to that of the military. That has triggered an all out sprint in the private sector to develop new applications for GPS. Private industry has already developed technology which increases GPS accuracy in some cases to the foot.¹²

According to the "EMS Agenda" put out by the **National Highway Traffic Safety Commission** the single most important piece of information provided in an emergency call is location. GPS continues to improve its location accuracy while at the same time decreasing both the size and cost of the GPS chip. The technology

¹¹ Tom McHale, "Digital Market Up--Digital Handset Sales In U.S. Increase 73%", **Electronic Buyer News**, March 10, 1997 pp. 31.

¹² Duane Noriyuki, "Just Think Of It As A Big Eye In The Sky" **Los Angeles Times**, April 27, 1997 pp. E-1.

should advance to a point where it becomes so precise that a person could be found in pitch black darkness.¹³ Applying the *Report and Order to new handsets* would promote a civilian GPS infrastructure compatible with that of the military.

6. Independent Experts Support The Policy That The FCC *Report and Order* Should Be Applied To New Handsets.

(1) **Herschel Shosteck & Associates**, a wireless phone analyst, has made the following observations:

Terminal (handset) solutions hold the advantage of minimum capital cost for carriers, but carry the disadvantage of not serving the embedded base of the terminals. However, installing an extensive infrastructure with diminishing revenue per new subscriber will only exacerbate the revenue crisis facing the carriers. The carriers do not have a large capital base with which to invest in a large network infrastructure. New technology in new handsets will generate new revenues to the carriers and will be a useable and appealing marketing tool of the carriers. The consumer is already willing to subscribe to the service¹⁴, up to \$3.30 per month, because safety is a very important consideration to the consumer.¹⁵

The severe economic impact that the network solution will have on the consumer and providers will be lessened by applying the *Report and Order to new*

¹³ Duane Noriyuki "Just Think Of It As A Big Eye In The Sky *Los Angeles Times* April 27, 1997, pp. E-1.

¹⁴ Stephanie H. Davis, "In My Opinion: The Business of Saving Lives, *Telephony*, May 26, 1997.

¹⁵ Laurence Swasey, "Subscribers Will Pay For E-911", *Wireless Week* September 8, 1997

handsets only instead of *forcing* a universal network application. If implementation is too expensive and too onerous, somebody will balk.¹⁶

Terminals (handsets) are becoming smarter. These smart terminals will enable carriers to benefit from data traffic without bearing the burden of an infrastructure investment.

(2) **Ira Brodsky**, President of Datacomm Research Co. in Chesterfield, Mo. has made the following observations:

GPS works on tree lined streets, in urban canyons and even (to moderate depths) inside buildings. Handset based GPS also consumes less power, requires less time to acquire a first fix, and is more economical. GPS utilizes triangulation in locating its callers, an existing technology, which is effective where other methods might fail, for example where there is a hole in the cell coverage.

A handset based solution opens the door to a constellation of applications--from fleet management to personal navigation to location based pricing--all under consumer control. The user can initiate a position fix, or request continuous tracking, at the push of a button. Integrating GPS in the handset is consistent with the trend towards smarter phones with enhanced data input/output capabilities.¹⁷ Encouraging adoption of GPS in *new handsets* will provide new and enhanced services to consumers and new revenues to carriers to help build new infrastructure.

Having every mobile telephone operator build its own locating network when a global solution is available for free is wasteful. But building terrestrial

¹⁶ Jon Healey, "Cell Phones As Personal 911 Alarms Wins Patent", **San Jose Mercury News**, September 16, 1997 pp. C-6

¹⁷ Ira Brodsky, "FCC Emergency 911 Mandate: Is It Security Or Is It Surveillance" **RCR**, September 1, 1997.

locating networks when GPS can be shown to be more reliable and accurate is just plain unwise.

Brodsky points out that the current FCC mandate favors a "mainframe" solution at a time when wireless handsets are looking more and more like personal computers.

In summary, GPS works well in rural areas where other systems may not,¹⁸ and it is in the rural areas where 70 percent of all deaths due to trauma occur. Integrating GPS in the handset is consistent with consumers continued demand for more features from their handsets and the industry trend towards smarter phones.

7. The FCC Enforcement Of the *Report and Order For New Handsets Only* Would Alleviate Right of Privacy Concerns.

GPS is capable of providing accuracy without compromising ones right to privacy. In this respect GPS is the preferred option. It offers the caller *more privacy* as their location would only become known when the caller hits a 911 or panic button, or *voluntarily* selected an option allowing them to be located instead of tracking callers continuously.¹⁹ The network "solution" would allow carriers and others to locate people who had no desire to be found and that can be unnerving. Fortunately, there is a simple remedy; move locating to the handset where it can be controlled by the end users.

¹⁸ Jonathan Marshall Cell Phones' New Role-Emergency Locators, **San Francisco Chronicle**, July 22, 1997 pp. C-4

¹⁹ Jonathan Marshall *quoting* Clem Driscoll Cell Phones' New Role-Emergency Locators, **San Francisco Chronicle**, July 22, 1997, pp. C-4

D. COST RECOVERY AND TECHNOLOGICAL LIMITATIONS ARE TWO MAJOR INDUSTRY REASONS FOR SEEKING A SUSPENSION OF THE *RULE AND ORDER*

Concern over cost has been voiced in numerous Petitions for Reconsideration, including Petitions submitted by the following entities:

- **PCIA** is concerned about the funding mechanisms which require the wireless carriers to assume large capital expenditures without a time frame for reimbursement (p. 4);
- **Personal Communications LP**, is concerned over the lack of a viable cost recovery mechanism for 911 implementation (p. 2), the “unreasonable” expectation of free 911 service from mobile phones (p. 3); and the method and time frame for reimbursement where large infrastructure upgrades are warranted (p. 7);
- **AT&T** is concerned over the lack of a recovery mechanism to recover cost of equipment upgrades (p. 2);
- **Ameritech** is concerned that the FCC implicitly has placed the burden of recovering costs only on the covered carriers (p. 16); and,

XYPPOINT Corporation proposes that the revenue to support the wireless 911 system should come from service initialized subscribers and that service should be limited to those subscribers (p. 6).

Concern over technical implementation has been voiced as well in Petitions filed by the following entities:

- **PCIA** claims the compatibility deadline is too demanding to deploy within the time frame (p. 3);

- **Nokia Telecommunications Inc.** has expressed concern over implementation of a system with 67% accuracy within 5 years given the various environmental conditions and differing technologies (p. 3);
- **Telecommunications Industry Association** is concerned with the technical limitations and ability to timely meet the requirements set forth in the *Report and Order*. (Executive summary p. 1);
- **Ameritech** is concerned over longitude and latitude reporting requirements (p. 6).

Both cost and technical concerns may be reduced in part or eliminated by modifying the *Report and Order* to apply to new mobile phones only.

The survey conducted by **Public Opinion Strategies** found that overall, consumers were willing to pay for E911, were more likely to switch to the carrier that offered the E911 technology and that both users and potential users ranked emergency location services as more important than many other features currently offered by the carrier.²⁰ (See section C-3, above.)

If the Commission applies the *Report and Order* to new wireless phones only, the industry will be more likely to generate the revenue stream it needs to support the infrastructure and will enable the carriers to comply with the deadlines set forth in the *Rule and Order*. This type of modification would also be consistent with the Commission's regulatory flexibility analysis provided pursuant to the Regulatory Flexibility Act.²¹

²⁰ Laurence Swasey, "Subscribers Will Pay For E-911" **Wireless Week**.

²¹ 2 USC §1531 Each agency shall unless prohibited by law assess the effects of regulatory actions on State, Local and Tribal governments and the private sector (other than to the extent that such regulations incorporate requirements specifically set forth in the law)(emphasis added)

E. ECONOMIC IMPACT

The goal of the Commission is, in part, to provide a uniform, nationwide system capable of locating the caller utilizing altitude, longitude and latitude.

One of the main problems with the implementation of the Commission's *Report and Order* is how the existing 40 million cell phones in use will be treated during the implementation of E911. While it is possible to build a tiny GPS receiver on a chip into the handset the cost of conversion could run into billions of dollars. These problems could be eliminated by revising the *Report and Order* so that only new phones need to come equipped with the technology.²² While the older cell phones may still exist, it may be analogized to the 1957 Chevy, they are still out there but they are not the mainstream of the future where regulatory policy should be focused. If digital is here to stay, and it appears to be the wave of the future, it would be a staggering waste of resources to retrofit existing cell phones that are ultimately going to be replaced anyway and would not be consistent with the Commission's proposed policy of creating a three dimensional location system since a retrofit of existing phones could utilize a two-dimensional land based system only.

For a two-dimensional land based TDOA system to be effective nationwide three cell transmitters must receive the signal simultaneously to perform the proper triangulation. This is problematical when attempting to transmit (1) while you are in motion; (2) when you are at the edge of any cell; (3) where there is a hole in the cell; or (4) in rural areas where it is unlikely there will be three cells within range capable of receiving the signal. Overcoming such large gaps in

²² Jonathan Marshall, "Cell Phones' New Role-Emergency Locators", *San Francisco Chronicle*, July 22, 1997 pp. C-4

coverage will require a substantial investment in the infrastructure estimated to run into the billions of dollars for new equipment and towers.

A consumer driven GPS system, revised to encompass only *new phones* would provide the most economical use of resources in meeting the compliance goals while providing the accuracy and broad application of E911 which the Commission seeks. The implementation of policy in phases would be consistent with other federal agency policies requiring a phase in of technological changes.

1. Cost and Price To Industry

Applying the *Report and Order* to new handsets only minimizes industry costs because it allows industry to finance its requirements using the revenue stream created by consumers demanding E911 and other enhanced features. The public has already expressed an interest when notified of the existing limitations. This allows for industry to focus on long term investment and infrastructure rather than on short term retrofitting of an existing cell system which is becoming obsolete with the advent of digital technology. The digital market expects annual sales of new cell phones to be in the millions.²³

Concern over costs associated with a network solution has also been voiced by numerous carriers (*See* Section D). The cost of the network build out solution is estimated to run between 5 to 6 billion dollars. Wireless carriers are concerned about their ability to finance the infrastructure and are concerned about the viability of the proposed mechanism through which their investment will be recovered. In addition to build out costs there are likely to be huge legal costs and

²³ Tom McHale, "Digital Market Up--Digital Handset Sales In U.S. Increase 73%", **Electronic Buyer News**, March 10, 1997 pp. 31.

long delays as well as many communities have declared a moratorium on the construction of cell site antennas in their backyard.

Conversely, GPS does not require further local infrastructure changes and the cost could at least be shared with consumers when upgrading their cell phones or purchasing of services bundles which include E911 thereby easing the economic impact of implementation on the wireless providers.

2. Economic and Employee Productivity

It would be *counter productive* to require a retrofit on some 40 million cell phones utilizing a two-dimensional land based system incorporating a technology that is giving way to digital. The Commission's current policy requires massive capital investment into retrofitting a technology which is becoming obsolete. Given the number of new and improved service options available the Commission should instead modify its policy to encourage rapid evolution of digital handset technology.

3. Competition

Applying the *Report and Order to new handsets only* will encourage faster evolution of technological enhancements. This will foster competition as carriers will seek to improve market share by offering competing bundles of services, which will incorporate E911.

The network solutions have not been proven, are expensive and, in order to become successful, must overcome the challenge of handling AMPS, CDMA and TDMA for digital cellular and CDMA,TDMA and GSM for PCS.

4. Effect On Market Supplies

The market has already indicated an ability to manufacture and supply the necessary handsets.²⁴ The technology to supply the full location information as required by the *Report and Order* is already available.²⁵

5. Employment

Enforcement of the *FCC Report and Order* is likely to enhance employment in the new sectors advanced to incorporate the new technology. Burgeoning markets for wireless telephones will create new jobs among carriers and manufacturers of smart terminals. As terminals come to resemble pocket computers, new uses will create new markets. It is anticipated that current personnel will be retrained.

6. Effect of Energy Supplies

The implementation of the *Report and Order* on new cellular phones, only, will lead to earlier compliance because the technology already exists. GPS was designed specifically for locating. Handset based GPS takes less time to acquire a first fix, consumes less power and is more economical.²⁶

F. ENVIRONMENTAL IMPACT

By choosing a handset solution the environmental impact of Commission's regulation is minimized. To achieve national coverage via a network solution could require the construction of as many as 100,000 new cell site towers. Local

²⁴ Tom McHale, "Digital Market Up--Digital Handset Sales In U.S. Increase 73%", **Electronic Buyer News**, March 10, 1997, pp. 31.

²⁵ Ira Brodsky, "FCC Emergency 911 Mandate: Is It Security Or Is It Surveillance" **RCR**, September 1, 1997.

²⁶ Ira Brodsky, "FCC Emergency 911 Mandate: Is It Security Or Is It Surveillance" **RCR**, September 1, 1997.

communities, especially in rural areas where the most construction is anticipated, have indicated a strong opposition to such construction for environmental and cost reasons. Political and legal resistance could involve delays in implementation for years, if not decades. Encouraging a terminal-based GPS solution removes these obstacles.

G. CONCLUSION

“The American people deserve a regulatory system that works for them, and not against them: a regulatory system that protects and improves their health, safety, environment, and well being and improves the performance of the economy without imposing unacceptable and unreasonable costs on society.”²⁷

By adopting the policy of enforcement of the *Report and Order* for new handsets only the Commission minimizes the impact on industry, maximizes the coverage of E911 services, meets its implementation targets and promotes an E911 system that is in the best interest of the public health and safety.

ZOLTAR SATELLITE ALARM SYSTEMS

DATED: October 25, 1997



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²⁷ Executive Order, 12866 September 30, 1993

CERTIFICATION

The undersigned certifies that, to the best knowledge and belief of the undersigned, this petition includes all information and views on which the petition relies and that it includes representative data and information known to the Petitioner which are unfavorable to the Petition.

DATED: October 25, 1997

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