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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

FCC meeting
December 17th, 1997 2 p.m.
Wireless Telecommunications Bureau

Participants

- John Cimko-Chief
- Nancy Booher-Deputy Chief
- Ron Netro-Engineer
- Won Kim-Attorney
- Dr. Adam Shapiro-physician
- Dr. Dan Schlager-President and Founder of Zoltar Injury Prevention Institute and Zoltar Satellite Alarm Systems

To Whom It May Concern:

As per protocol, this is a letter to notify you of a meeting that occurred discussing a revision of the commissions's rules to ensure compatibility with enhanced 911 emergency calling systems. CC Docket No 94-102. This meeting was a follow up to the filing of our ex-parte reply comments which were submitted in October of 1997.

It was our contention that the present rules do not allow handset technology (particularly but not specifically GPS) to fairly compete with network technology solutions. It is our belief that the rules should apply only to new phones and then the best location technology solutions can prevail. Previous adoption of new safety technology such as seat belts and airbags has followed this model of introducing new technology into society. This modification would not provide any disadvantage to a network solution should public service answering points prefer to adopt network technology for localization.

We have further concerns over why there should be exclusion of satellite phones and the discussion of waivers to rural areas. These are two particular situations where localization may be needed most, since 70 percent of all deaths occur in rural areas.

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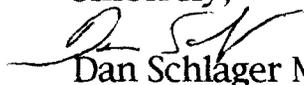
Satellite phones are projected to be used in areas where cellular is unavailable i.e. rural areas or by highly mobile (international)business travelers often unfamiliar with the terrain. These are situations that can be solved by a GPS handset solution, and would provide improved rescue services to rural areas. With the closing of many rural emergency departments and hospitals, these areas (which can be served by satellite but not cellular systems) are going to be more dependent on a well integrated and responsive emergency medical systems.

We appreciated the opportunity to express our viewpoint and we thank the wireless division at the FCC for the time they spent with us and for the time and devotion they have spent in pursuit of a policy that will provide the most benefit to the most people.

I will continue to work on the improvement of personal safety and security devices and would be available to answer any more questions concerning a handset-terminal solution. It is my personal belief that there will be new personal safety devices such as "smart" defibrillators, "smart" smoke and carbon monoxide detectors, "smart" lifepreservers, and "smart" airbags in cars which will be based on a GPS-wireless integration technology. Rescue systems such as the helicopters and ambulances are already using a GPS based technology to dispatch and localize the emergency. We feel that GPS should be given the opportunity to compete on a level playing field in the wireless 911 solution. That could be accomplished by making the mandate apply just to new phones.

As GPS technology continues to improve at the rapid rate that it has shown over the past five years, it should be able to supply altitude and accuracy that far exceeds the mandate at a reasonable cost to the consumer.. I look forward to working with you on this exciting project to improve public safety.

Sincerely,


Dan Schlager MD