

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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JUN 19 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Request for Further Consideration of Call Back)
Number Issues Associated With Non-Service)
Initialized Wireless 911 Calls)
)

CC Docket No. 94-102
WT Docket No. 00-80

To: The Commission

COMMENTS OF SECURE ALERT, L.L.C

SecureAlert, L.L.C. ("SecureAlert"), by its attorneys and pursuant to the Commission's May 18, 2000, Public Notice (DA 00-1098), hereby files comments in the above captioned proceeding concerning the April 28, 2000 request ("Request") of the Texas 911 Agencies, the National Emergency Number Association (NENA), the Association of Public-Safety Communications Officials-International, Inc. (APCO) and the National Association of State Nine-One-One Administrators (NASNA) (collectively, the Public Safety Entities) seeking further consideration of call back number issues associated with non-service initialized 911 calls.

In brief, SecureAlert believes that requiring covered carriers¹ to process all wireless 911 calls, including those from non-service initialized handsets, continues to be in the public interest because it ensures that Basic 911 Service² is available to all individuals, regardless of their ability to pay or desire to subscribe to wireless service.

Nothing in the Public Safety Entities' Request suggests that this vital "safety net" should

¹ Covered Carriers are Broadband Personal Communication Services, Cellular Radio Telephone Services, and Geographic Area Specialized Mobile Radio Services and Incumbent Wide Area SMR Licensees in the 800 MHz and 900 MHz bands to the extent that they offer "in-network" switching, and have the capability to hand off calls seamlessly without manual subscriber intervention and reuse of frequencies. 47 C.F.R. § 20.18(a).

be discontinued, only that the 911 services provided by the Public Safety Entities might be enhanced in some instances if the wireless industry provided call back capability to *all* wireless phones, including to non-service initialized handsets. SecureAlert would support industry and/or FCC efforts to extend call back capability to all wireless phones, so long as this does not change the rules that currently apply to the provision of Basic 911 Service.

I. Statement of Interest.

SecureAlert is a Tennessee limited liability company that develops, distributes and markets wireless consumer safety products under the Magnavox brand. One of SecureAlert's newest safety products, Mobile911, is an emergency wireless phone designed to provide two-way voice access to Basic 911 Service. Mobile911 was designed to serve segments of the population that have been traditionally overlooked by the wireless communications industry. Such individuals include the elderly, handicapped, youth, and individuals having low or fixed incomes. SecureAlert conducted extensive research with people from these groups who described what they like and dislike about personal safety devices currently on the market. Most are afraid to carry weapons or self-defense sprays. Many would prefer wireless telephones for emergencies, but have other concerns about wireless service plans. Many cannot afford to subscribe to even the most basic wireless phone service, which involves recurring charges of several hundred dollars per year, even if used only in emergencies.³ Others do not want to

² "Basic 911 Service," sometimes referred to as "Phase 0" service, is defined in Section 20.18(b) of the Commission's Rules as the requirement that carriers transmit all wireless 911 calls they receive from callers dialing 911 from a handset capable of accessing their network, regardless of their call validation.

³ See, e.g., October 24, 1999 letter of Penny Paradise ("Since then I had been looking into buying a cell phone for myself just to carry in my car for emergency use. However, I did not wish to pay a monthly charge just to carry an unused phone."); March 23, 2000 e-mail of Martha Jones ("I am a single mother of 2 children and love the idea of a way to get 911 without having to get a cell phone, which I cannot afford."), at Attachment A.

depend on a device that will require that they remember to recharge batteries every few days.⁴ Still others, particularly seniors, are confused by the numerous small function keys and increasingly complex rate plans of current cellular and PCS services.⁵

Mobile911 is an analog cellular phone that enables two-way voice communication but is only capable of dialing 9-1-1. It cannot receive incoming calls, but it is similar to the millions of uninitialized and/or decommissioned cell phones in circulation that can be put to use for Basic 911 Service. However, SecureAlert improved upon this basic “safety net” in a number of ways. Mobile911 is easy to use, with a single large button to dial 911. Among its other safety features, Mobile911 has a built-in 95-decibel siren because self-defense experts recommend making lots of noise and calling for help in an emergency, and it remains operable for a long time using inexpensive batteries that do not need to be recharged. In sum, SecureAlert designed Mobile911 to be a simpler, more affordable and maintenance-free solution for people who want a wireless phone for emergencies only, or who have difficulty using a traditional cell phone. SecureAlert’s customers rely upon the ability to gain instant access to 911 emergency services with the touch of a button. A sampling of consumer and public safety testimonials about Mobile911 are included in Attachment A.

⁴ See June 4, 1999 letter of Albert Fenston, whose 84-year-old mother has difficulty using a cellular phone (“I thought perhaps a cellular phone may be the answer... but each time I visit I see it is not CHARGED! The battery is dead. I asked her did you remember to put it in the charger? She forgets! You see my problem.”), at Attachment A.

⁵ See February 25, 2000 e-mail of Debra Wood, whose father is a stroke victim (“Also, the phone is so small that he has difficulties dialing it, seeing the tiny numbers, etc. Therefore, I thought [Mobile911] would be a perfect solution for him.”); March 28, 2000 e-mail of Julie Hafley “[My grandmother] has poor eyesight and poor mobility and could really use this type of service...” at Attachment A.

II. Providing Call Back Capability is Not as Important as Ensuring That All Wireless Phones Are Able to Access Basic 911 Service

The Public Safety Entities request further consideration by the FCC of call back number issues associated with non-service initialized handsets.⁶ In particular, they indicate that “the call disconnection issues associated with the use of wireless telephones creates a public safety concern that should be further considered in this proceeding.” SecureAlert applauds the Public Safety Entities and others that are actively implementing Phase I wireless E-911 service. However, as the Public Safety Entities would presumably agree, providing call back capability is not as important a public safety concern as ensuring that all wireless phones are able to access Basic 911 Service in the first place. If the Commission should choose to revisit the issue of providing reliable call back numbers for all wireless 911 calls, SecureAlert strongly believes the FCC should not disturb its previous determination “that the public interest would clearly be better served by requiring covered carriers to forward all 911 calls.”⁷ This conclusion, along with the Commission’s designation of 911 as the universal emergency telephone number pursuant to The Wireless Communications and Public Safety Act of 1999⁸, has helped to make immediate access to emergency services available to all Americans.

SecureAlert is excited about the rapid development of technology in the wireless industry, and especially the use of advanced technology to address public safety issues associated with E-911. These technologies may one day permit the incorporation of multiple air-interface standards, call back capability, and handset-based location features

⁶ April 28, 2000 *Ex Parte* Request of the Public Safety Entities, CC Docket No. 94-102 (“*Ex Parte Request*”) at 1.

⁷ Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, *Order* DA 96-2530 (1997) 10 CR 1088 at 1099 (¶ 33) (*emphasis added*).

(*i.e.*, GPS) into later versions of the Mobile911 handset. However, adding these advanced features has its drawbacks, as well. Each new functionality adds to the cost and complexity of the unit, factors which cause many individuals to shy away from traditional wireless service. Also, many of the advanced features associated with digital wireless service are not yet widely available, or are not reliable enough to be acceptable for a personal safety device such as Mobile911, which was designed for the analog network because digital wireless networks do not have as extensive a coverage footprint as analog cellular service.

SecureAlert understands that having call back capability may be important to PSAPs in those situations where a 911 caller is disconnected. However, the Public Safety Entities have not provided any statistics regarding the percentage of 911 calls that are disconnected, nor do they explain why call back capability is so important that it would drive the Commission to adopt a policy limiting access to Basic 911 Service. For Mobile911 customers, re-establishing a connection to 911 is as simple as pushing a single button. If a person is too sick or injured to do that, chances are they would be unable to push a button to answer a returned call from the PSAP. If call back capability is required for all handsets, the availability of low cost personal safety devices like the Mobile911 handset will be threatened and a segment of the population will not have the ability to own a wireless 911 safety device.

III. Any Modification of the Commission's E-911 Policies and Rules Should Broaden, and Not Restrict, Consumer Access to Emergency Services

Fortunately, many of the nation's leading wireless carriers have always seen the wisdom in providing the public with free and unrestricted access to Basic 911 Service,

⁸ Wireless Communications and Public Safety Act of 1999, Pub. L. No. 106-81, enacted Oct. 26, 1999, at Section 4 ("911 Act").

regardless of their status as a paying customer. As described above, this wireless “safety net” has been mandated under the FCC’s policies and rules since 1997. Indeed, as the Public Safety Entities recognize, this requirement has led many individuals and businesses to donate their old wireless telephones to women’s shelters and other organizations.⁹ The phones are refurbished and programmed to dial 911 and/or other emergency numbers, and service is provided free of charge by many wireless carriers as a public service (accompanied by great public relations fanfare).

However, not all of those who would benefit from free access to Basic 911 Service are fortunate enough to be beneficiaries of such generosity. Thousands of consumers, including those that have ready access to wireless service, keep a spare phone in their glove compartment or purse, or give an old, decommissioned cell phone to their child or other loved one for use *in case of emergency only*. These individuals, along with Mobile911 users, have staked their personal health and safety on the Commission’s inclusive 911 access policy. The FCC should not ignore the public’s reliance on its current policies and rules. Any modification of the Commission’s E-911 policies and rules should therefore broaden, and not restrict, consumer access to Basic 911 Service.

IV. The Commission Must Be Careful Not to Create a “Digital Divide” Between Those Who Have Access to Basic 911 Service and Those Who Do Not

Millions of uninitialized and/or decommissioned cell phones will remain in glove compartments and purses regardless of what obligations are imposed by the Commission’s rules and what other technical standards the wireless industry eventually adopts for the provision of E-911 Phase I and Phase II services.¹⁰ Moreover, people

⁹ Public Safety Entities Request at 2, Andrea Watson “Used cell phones to protect women,” Lubbock Avalanche-Journal, April 11, 2000.

¹⁰ Industry analysts estimate that there are currently as many as *24 million* inactive wireless phones in people’s homes and businesses. See, March 14, 2000 Press Release, “Wireless Foundation & National

whose needs are not being served by traditional wireless handsets and service are taking advantage of the low-cost alternative offered by personal safety products such as Mobile911. Bearing this in mind, the Commission must be careful not to adopt E-911 policies or rules that create a “digital divide” between those who have access to Basic 911 Service and those who do not. Many Mobile911 customers are persons who cannot afford traditional cellular service, *i.e.*, the very people for whom FCC Chairman William Kennard seeks to ensure access to telecommunications services.

As noted above, Section 20.18 (b) of the Commission’s Rules currently permits anyone with a wireless phone to have access to Basic 911 Service. This requirement is consistent with many of the Commission’s laudable efforts to promote access to telecommunications services to all Americans. With regard to wireline access to emergency service, the Commission has designated access to 911 service in rural, insular and high cost areas as eligible for universal service support pursuant to Rule Section 54.101. FCC Chairman William E. Kennard has further recognized that access to wireless technologies is helping to bridge the digital divide.¹¹ Ensuring that affordable wireless access to the Basic 911 Service “safety net” is consistent with this goal, and with the Commission’s overriding mandate in Section 1 of the Communications Act to promote public safety through the use of radio communication.¹²

Moreover, the Commission’s current “open access” requirement for wireless Basic 911 Service is consistent with state regulation of pay telephones. Users of pay

Coalition Against Domestic Violence Launch National ‘Donate a Phone’ Campaign” *citing* Hershel Shostek and Associates & CTIA, February, 2000. www.wirelessfoundation.org/08media/index.cfm

¹¹ “Wire Less Is More” an address by FCC Chairman William E. Kennard to the Cellular Telecommunications Industry Association, New Orleans, Louisiana, February 28, 2000 (As Prepared for Delivery).

¹² 47 U.S.C. § 151.

phones have long been able to place 911 calls without any charge in many states as a result of state and local regulation.¹³ The Commission has previously recognized that the pay telephone is the closest wireline analogy to a wireless handset, in terms of offering a capability of accessing 911 service while the user is away from his or her home or office.¹⁴

¹³ See, e.g., Fla. Stat. Ann. Sec. 364.3375(2)(a) (West 1996) (requiring that each pay telephone station shall receive and permit coin-free access to the universal emergency telephone number "911" where operable); Idaho Code Sec. 31-4811 (1995) (pay phones to be converted to allow emergency calls without charge); Iowa Code Ann. Sec. 34A.4 (West 1996) (requiring conversion of pay telephones to allow 911 calls without depositing coins or paying other charges); Mass. Gen. Laws Ann. ch. 166, Sec. 14A (West 1996); Minn Stat. Ann. Sec. 403.04(2) (West 1996); S.C. Code Ann. Sec. 23-47-20(c)(12) (Law. Co-op. 1993); S.D. Codified Laws Ann. Sec. 34-45-13 (1995); Wis. Stat. Ann. Sec. 146.70 (West 1996).

¹⁴ Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Report and Order and Further Notice of Proposed Rule Making*, CC Docket 94-102, FCC 96-264, 3 CR 967, 11 FCC Rcd 18676 (1996) (¶ 37).

V. Conclusion.

The original rationale that led the Commission to promulgate its rules for Basic 911 Service still remains. Universal access to Basic 911 Service is in the public interest. The Commission should not threaten the basic, yet vital, "safety net" that non-service initialized handsets, and specialized personal safety devices such as Mobile911, provide to those who cannot afford or otherwise choose not to purchase a wireless service plan. SecureAlert submits that the public interest would be served by broadening the safety net, if anything, and encouraging the development of E-911 technologies that allow location and call back features to be accessed by all.

Respectfully submitted,
SecureAlert L.L.C.

By 
John A. Prendergast,
Cary Mitchell
Its Attorneys

Blooston, Mordkofsky, Jackson & Dickens
2120 L Street N.W.
Washington, DC 20037
Tel: (202) 659-0830

Michael Bernstein, Managing Member
SecureAlert, L.L.C.
109 David Lane
Knoxville, TN 37922
Tel. (865) 694-2704 x3104

Filed: June 19, 2000

Attachment A
Sampling of Consumer and Public Safety Testimonials
In Support of Mobile911 Handset

PO Box 720573
Mc Allen, TX 78501
October 24, 1999

America Service Care
109 David Lane
Knoxville, TN 37922

Re: Mobile 911TM Units

To Whom It May Concern:

Recently I ordered two Mobile 911 units and just want to say I am totally pleased with the item. I called to express this feeling and at that time suggested that your company advertise on local national television stations in our area (South Texas) because our population nearly doubles in the winter with elderly, retired people who would find this unit most helpful. I might add that your advertisement should emphasize the one time "buying" cost and that there are no other charges. Most people are skeptical that the unit will cost them additionally as cell phones do. All of the possible reasons for having one are on the box, but most people never think about them; for example, young girls taking one on a date, students in college etc. It would be a wonderful gift for many people, especially those who live alone.

I learned about the unit this past summer when I contacted Magnavox on line because my mother has a serious problem with falling and not being able to get up. I wanted something she could wear to obtain help. Because the Mobile 911 units were not yet available, I considered one of the Med Alert necklace or wrist items; however, my mother refused the idea of having one because of its distance limitations. Someone talked her into buying a cell phone and even got a carrying case for it, but it was cumbersome and she would not use it.

Since then I had been looking into buying a cell phone for myself just to carry in my car for emergency use. However, I did not wish to pay a monthly charge just to carry an unused phone. Shortly after that a person (named Sarma, I believe,) called and asked if I was still interested in the Mobile 911.

To make a long story short, as soon as I received the units, I sent my mother one. She was shown how to use it and instantly called me to tell me the Mobile 911 unit was perfect! She even said she would place it near the shower in case she might fall in the bathroom, and that by having the unit nearby, it removed her fear of going places and shopping where she has previously been afraid she might fall. On occasion she has fallen and waited hours for someone to find her.

My daughter, who showed Mom how to use the unit is also interested in obtaining one, even though her work place supplies her with a cell phone, because her career entails case work where she must go into some frightening neighborhoods. As for me, I keep mine handy and feel much safer—especially since I have to drive on isolated roads (sometimes at night) and one time had to pull over during an asthma attack.

The light weight, small size of the unit makes it handy to carry in a pocket or purse and provides a person with a real sense of security. The only thing I think might be improved would be to make the side buttons larger or easier to engage. I could not test the volume control, so do not know if it would be helpful for people who are hard of hearing. Of course, I am thinking about the elderly and those with less dexterity. Still I think the unit is a great!

Sincerely yours,



Penny D. Paradise

-----Original Message-----

From: MJones [mailto:██████████@flash.net]
Sent: Thursday, March 23, 2000 1:42 AM
To: info@mobile911.com
Subject: emergency phone

I am a single mother of 2 children and love the idea of a way to get 911 without having to get a cell phone, which I cannot afford. Do you have any programs in place of payment plans for someone like me? I am sure that I am not alone in this need, most single moms that really need this service the most cannot come up with 200.00. Please let me know. Martha M. Jones, Fort Worth, Texas

3000 Bronx Park East #12J
Bronx New York 10467
June 4, 1999

Magnavox/ American Secure Care
PO Box 23345
Knoxville TN 37933-1345
ATTN: Office of the President

RE: Emergency Response System

Dear Sir,

Perhaps you can be of assistance to me with a problem I have. My Mother is 84 years old and lives in Upstate New York (Putnam County). She lives on her monthly Social Security Check. She lives alone in a house my Father purchased 20 years ago before he passed away.

In the past year she has gotten worse in her physical condition with crippling Arthritis. I am afraid she will fall, somewhere in the house, coming down the stairs or walking in the yard. The nearest neighbor lives about 500 yards away and they work all day and are out late at night so there is really NO ONE around she can depend on. My wife and I live about 50 miles away and go up there 2 or 3 times a week to check on her and we also call every night, but if something were to happen. How could she contact help?

I thought perhaps a cellular phone may be the answer. I know they are expensive and heard that the monthly charges could also be rather high, so I wrote to MCI and explained that my Mother would only be using the 911 button and, of course, only in the event of an emergency. She gets confused on how to operate it, but I thought just to hit the 911 button would be no problem. They (MCI) were nice enough to give her the phone for free and only charge us \$9.99 a month. This was within our budget (I have two boys I'm "trying" to put through College). She has it several months but each time I visit I see it is not CHARGED! The battery is dead. I asked her did you remember to put it in the charger? She forgets! You see my problem.

I contacted the NYC Dept. of the Aged to see if there was a "device" out there that would resolve the problem and was told about your product. They also told me about the installation charge and the monthly charge of about \$30.00 a month? She has Medicare Part A & B But the woman told me they do not cover this device? Only if she were on Medicaid! I don't understand our system? You have to be on **WELFARE** to get things for free? What about all the people who WORKED all their life and now needed "help"?

I realize you are not MCI but is there anything you can do for us (price wise) to make your device "affordable" to us? My Family and I would be in your debt for any assistance you can give us. I thank you for your cooperation and understanding in this matter.

Sincerely,

Albert Fenston

-----Original Message-----

From: Debra_S._Wood@[REDACTED] [mailto:Debra_S._Wood@[REDACTED]]

Sent: Friday, February 25, 2000 1:28 PM

To: info@mobile911.com

Subject: Question re: your phone

Hello...

I am seriously considering purchasing one of your phones for my father. He is a senior citizen who still does some light driving around his home. A couple of years ago, at my suggestion, he purchased a cellular phone for emergencies which he keeps in his car. However, due to a mild stroke he had several years ago, I'm afraid that teaching him to use this phone has been somewhat of a futile effort. His short term memory is...well, very short! Also, the phone is so small that he has difficulties dialing it, seeing the tiny numbers, etc. Therefore, I thought this phone would be a perfect solution for him. At this time, I am 100% sure that if he ever really needed the cellular phone, he could not use it. However, I'm a bit leary on the 911 phone, because in the event of a car breakdown, etc., there would be no way he could call anyone with this phone. Can you give me any information as to whether or not there is anyway one could use the 911 phone in the event of a car emergency? Or what he could do if he had a car breakdown, was in an area where he could not get to a phone, and only had the 911 phone???

Thanks for any help you can provide.

Debra Wood

-----Original Message-----

From: Julie Hafley [mailto:██████████@hotmail.com]

Sent: Tuesday, March 28, 2000 4:54 PM

To: info@mobile911.com

Subject: Magnavox Mobile 911 phone

Hello-

I'm a librarian with St. Charles County in Missouri and I am enquiring about the Magnavox Mobile 911 phone. My grandmother, who has no access to a computer, would like some information sent to her. Her address is Ruth Hafley, 332 Eureka Rd., ██████████ ██████████. She has poor eyesight and poor mobility and really could use this type of service but has no computer access and could not read the computer screen, even if she did have access.

I hope you can help, but please contact me if you cannot. Thank you.

Get Your Private, Free Email at <http://www.hotmail.com>

From: Al Thompson [redacted@earthlink.net]
Sent: Wednesday, March 01, 2000 4:33 PM
To: info@mobile911.com
Subject: Your new 911 cell phone

I think this is the greatest thing since sliced bread, I just bought one and received it today. I have been borrowing my next door neighbors cell phone when I go on trips. Here is a copy of the note I sent to my E-Mail friends. Thanks for a very practical product. Al Thompson.

I just bought what I call an insurance policy, living alone it really appealed to me. It's a 911 only cell phone, has one button to press and a built in homing siren and regardless of where you are in the U.S.A., where cell phones work, you are connected directly to 911, there is no monthly fee or hookup charge. I don't have a cell phone so this is a great insurance policy for emergency help at home or on the road. I think this will be a hot seller for those who hike or travel alone like I do. Later, Al

-----Original Message-----

From: H.J. Sherrill [mailto:████████@totalaccess.net]

Sent: Friday, December 03, 1999 9:13 AM

To: info@mobile911.com

Cc: SnKitty

Subject: group sales/affiliates

Fascinating!

I've often wondered why this product/service wasn't available. With three daughters in their early twenties, I do not want to pay their cell phone bills but don't like them not having emergency communications available - you have ended the dilemma!

Before I sign up as an affiliate, I do have a couple of questions: how is the tracking on group or other offline sales handled? I see potential here as a fundraiser and service offer for local VFD's and schools as well as individual sales. I would also be interested in knowing if there is a wholesale plan for retail offline distribution available.

Truly,

H.J. Sherrill

(owner)Tietown Auction Barn

re: www.mobile911.com

cc S.J. Najvar

-----Original Message-----

From: Tom and Carol Kulikowski [mailto:████████@fast.net]

Sent: Tuesday, November 30, 1999 7:41 AM

To: info@mobile911.com

Subject: Is product returnable?

Dear Mobile 911,

I saw your product on the Today Show and thought it would be wonderful for my elderly mother. I would like it to be a surprise for her for Christmas, but if it is not returnable, I will ask her about it before purchasing. Sometimes my mother can be "anti-gadget" so I'm not sure she will think it necessary; although my siblings and I think it is great. Also, why is it not available in stores? Thank you.

Carol Kulikowski, Allentown, PA

-----Original Message-----

From: [REDACTED]@aol.com [mailto:[REDACTED]@aol.com]
Sent: Wednesday, January 26, 2000 6:21 PM
To: info@mobile911.com
Subject: comment

I really am proud of inventors for making this product. Good job. It is
good for people who don't have alot of money but want to be safe. As soon as
I start driving my own vehicle and going out late at night i will buy
one...once again good job!!

-----Original Message-----

From: John Cochran [mailto:██████████@netzero.com]
Sent: Monday, February 14, 2000 2:10 AM
To: info@mobile911.com
Subject: Travel use of the Mobile 911

Dear folks,

My wife and I don't have cell phones, we haven't really needed them (no kids at home and both work at the same place). Recently we started doing some more traveling and wondered what we would do if we had a problem on the road in some remote area or at night. Then we just read about the Mobile 911. This sounds like the perfect answer for us IF we can use this "phone" to call in problems such as car break downs. In speaking with a local police officer he felt that anytime you're stranded that's an "emergency" and hence would qualify as a 911 call. On the other hand we don't want to spend the money for this phone and then get in trouble for using it to try to contact roadside service for a flat tire. Can you help us out? We can see the value of this product for many people, we're just not sure if we qualify (and don't particularly want to get in trouble or "abuse" the 911 system).

Many thanks!!!

-----Original Message-----

From: Stacy St. Clair [mailto:████████████████████@hotmail.com]

Sent: Tuesday, February 22, 2000 11:42 AM

To: info@mobile911.com

Subject: 911 phone

Hello. My name is Stacy St. Clair. I was hoping that I could receive more information on your mobile 911 phone. It sounds perfect for my needs. My mailing address is:

Stacy St. Clair
1000 Brookview Ct.
Morgan Hill, Ca. 95037

Or you can e-mail me with the information. I'm mostly interested in where I can purchase this phone.

Thank you so much.

Stacy St. Clair

-----Original Message-----

From: Eileen Geist [mailto:██████████@email.msn.com]
Sent: Monday, February 28, 2000 6:15 PM
To: info@mobile911.com
Subject: Emergency phone

Thank you, Thank you for introducing your Mobile911 emergency phone!

Living alone has often given me thought about what would happen if, God forbid, that an accident would happen that I'd have no help.

Question: when calling 911, will they call family members, or perhaps AAA for assistance? Or is it strictly for police and medical personnel?

I appreciate your help.

Sincerely, Eileen

-----Original Message-----

From: Randy Dutton [mailto:r[REDACTED]@home.com]

Sent: Wednesday, March 22, 2000 9:21 PM

To: info@mobile911.com

Subject: Pool Safety 911 Phone

Do you have a 911 cell phone that can be affixed to a wall next to a public pool? And if you don't have one, can you make one? Health Code requires a phone to be near a public pool for emergencies. Currently our Homeowners Association has to pay about \$62/month for a pay phone. If a 911 phone were installed, similar to a pay phone, it should meet Code and as the Treasurer of the Association I could save significant \$. If residents want to make a social call they can walk the short distance to their home besides most have cell phones! The national market could be significant and the pool phones could provide you with additional marketing exposure.

Sincerely,
Randy Dutton

-----Original Message-----

From: Jay Dean [mailto:████████@butlerpd.com]
Sent: Sunday, January 02, 2000 1:59 AM
To: info@mobile911.com
Subject: Group Sales-Pricing

Inquiring about Group Sales for POSSIBLE purchase by our Police Dept. for Senior Citizens and or Crossing Guards.
Please forward information on pricing plans available for group & government special pricing.

In addition, if possible, sample Mobil 9-1-1 Emergency Communicator be forwarded to Dept. for inspection & review by PD & groups.
Please forward replies to below.

--
Sgt. Jay Dean
Butler Police Dept.
10 High St.
Butler, NJ 07405
Voice: (973)-████-████
FAX: (973)-████-████
E-Mail: ██████@butlerpd.com
--

-----Original Message-----

From: PCPROSECUTOR@n[REDACTED].net [mailto:PCPROSECUTOR@n[REDACTED].net]
Sent: Wednesday, January 05, 2000 10:47 AM
To: info@mobile911.com
Subject: Domestic Violence Protection

Dear Sirs:

I am a Victim Liaison with the Putnam County Prosecuting Attorney's Office in West Virginia. Lately, I have been running across articles on the Internet describing community donations by cell phone providers to high risk victims of domestic violence. Your product looks to be the most user friendly and emergency oriented. Do you offer any kind of program wherein your product could be donated, in affiliation with area victim service providers, to high risk victims of domestic violence?

Thank you for attention to this matter.

Susan Wendelken

Victims Liaison Division

-----Original Message-----

From: dvangaasbeck [mailto:dvangaasbeck@charter.net]
<mailto:dvangaasbeck@charter.net>

Sent: Monday, January 31, 2000 5:02 PM

To: info@mobile911.com

Subject: mobile911 possibilty

Hi! My name is Darlene VanGaasbeck. I have been teaching women's self defense courses for over a decade now. I have been looking for a product similar to yours to use in emergencies for myself and for my students. I am a RAD (Rape Aggression Defense)certified instructor and we suggest using a cell phone to call 911 in our course manual. RAD courses are taught all over the U.S. and Canada at more than 350 univerisities. I have a few concerns/comments about your product and may be interested in selling/buying your product.

My comments first. Your product is a good one for the home. The 911 feature with one button is a plus and the battery power supply is a plus. The alarm can be a plus when it is on. The feature which tells you if an area will receive a cell phone transmission is also a prudent one. This phone would be good for use in emergencies where power is out or phone lines are dead during natural disasters, house break-in etc.

My concerns next. I am not convinced how well this product will work on the road in emergencies. Is it true that 911 can not be used from many interstate highways? Many mobile phone companies provide other numbers for those areas where 911 can't be used. Have you done any research to find out which interstate highways will work for 911 and in which states? I would like to see the research. Secondly, a secondary power source would be wise like an adapter to use the cigarette lighter in the car as a power source in case batteries are dead. Thirdly, while I understand why you may have designed it this way, it is dangerous to make the built in alarm so easy to turn off. If a women is being assaulted say in her car and she calls 911, the alarm goes off when she makes the call giving her assailant more reason to get to her quickly ie. getting into the car to stop her while

the alarm is off. Some 911 systems now have the capability to track the approximate location source of the call even if the caller can not talk. You may want to think about putting the alarm in a detachable part of the phone so the alarm can be detached from the phone so the phone and the alarm can be used at the same time.

Additional comments about your comparisons of other safety options to that of a regular cell phone and a dog. You choose the most expensive of these options to compare. Cell phones can be purchased and used without a monthly package. One does not have to be on a cell phone service provider to have 911 call go through which you know since that is the way your product works. Though one does have to have the phone activated at some point. Thus far in my investigations, I have found the phone free plus \$200 for a one year service activation. If the phone is only used for emergencies then \$200 is all you pay. Your phone seems prohibitively expensive when compared this way. Women who are domestic violence victims who certainly could use such a product could never afford such a product. Would you consider lowering the cost. I think you will sell three times as many.

I may be interested in purchasing/selling your product. I hope you will seriously consider my concerns in designing future models of your product. As I said it is a well designed product for use in the home. I believe with the features I discussed above that this product has potential to be excellent rather than just good and would be useful for travel as well as home use.

I do not currently have a business web site to take advantage of your affiliation program. What other offers do you have available? Would it be possible to get one model free to show to my students. I currently teach 60-130 women per year and I am getting ready to expand my self defense business. In two years, I hope to double the number of women I instruct per year. My non-business web site is <http://www.nsm.smcm.edu/Chemistry/Darlene/apsdhome.htm>. RAD's website is <http://www.rad-systems.com>.

Regardless, I will tell other RAD instructors about your product. While RAD and it's instructors don't normally sell self defense products they do like to be aware of products that might be useful for students who want them. RAD's primary function is to educate women about viable self defense options and to provide them training in those options.

I look forward to hearing from you. Thank you for your time in this matter.