

Before The
Federal Communications Commission
Washington, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

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

COMMENTS OF THE
CELLULAR TELECOMMUNICATIONS INDUSTRY ASSOCIATION

The Cellular Telecommunications Industry Association ("CTIA")¹ respectfully submits these comments in response to the Commission's *Public Notice*² seeking additional comment concerning call back capabilities for non-service initialized handsets.³ The concerns raised by the Public Safety Entities⁴ have long been recognized

1 CTIA is the international organization of the wireless communications industry for both wireless carriers and manufacturers. Membership in the association covers all Commercial Mobile Radio Service ("CMRS") providers and manufacturers. CTIA represents more broadband PCS carriers and more cellular carriers than any other trade association.

2 *Public Notice, Comment Sought on Request for Further Consideration of Call Back Number Issues Associated with Non-Service Initialized Wireless 911 Calls*, DA 00-1098 (Rel. May 18, 2000).

3 A "non-service initialized" handset means that the user is not purchasing service from a wireless carrier. See *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Memorandum Opinion and Order*, ¶¶ 13, 108, 12 FCC Rcd 22665 (1997) (*First Reconsideration Order*); see also, *Notice of Proposed Rule Making*, at n.46, 9 FCC Rcd. 6170 (1994). When a handset has never been initialized, or the subscription has lapsed, the handset is not associated with a dialable telephone number. *First Reconsideration Order*, at ¶ 108.

4 The "Public Safety Entities" are 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

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by the Commission,⁵ and therefore a full record has been developed describing the difficulty of devising a technical solution to this problem. While no technical solutions have been developed since the Commission last received comment on this issue, the marketplace has responded to the Commission's policy choice mandating the forwarding of all wireless 911 calls (in preference to sending PSAPs only validated calls) by developing and marketing handsets specifically designed for dialing 911 that are physically incapable of receiving calls. The widespread availability and use of such handsets means that technical solutions, even if they were available (which they are not), are not sufficient to address the legitimate concerns raised by the Public Safety Entities.⁶ Rather than pursue a futile search for technical solutions that are incapable of solving the

Administrators (NASNA). The Texas 911 Agencies, in turn, are comprised of the Texas Commission of State Emergency Communications (a state agency) and the following local Texas Emergency Communications Districts: Tarrant County 911 District, Bexar Metro 911 Network, Brazos County Emergency Communication District, DENCO Area 911 District, 911 Network of East Texas, Galveston County Emergency Communication District, Greater Harris County 911 Emergency Network, Henderson County 911 Communication District, Howard County 911 Communication District, Kerr Emergency 911 Network, Lubbock County Emergency Communication District, McLennan County Emergency Assistance District, Midland Emergency Communication District, Montgomery County Emergency Communication District, Potter-Randall County Emergency Communication District, and Texas Eastern 911 Network.

⁵ The Commission itself recognized that carriers would not always be able to provide reliable call back numbers for 911 calls from non-service initialized phones. *See In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Report and Order and Further Notice of Proposed Rulemaking*, 11 FCC Rcd 18676, 18694-96 ¶ 38 (1996) (*E911 First Report and Order*).

⁶ The specific issue raised by the Public Safety Entities is the lack of a valid call back number for "donated wireless telephones ... distributed by many organizations." *See* April 28, 2000, *Ex Parte Request for Further Consideration of Call Back Number Issues Associated with Non-Service Initialized Wireless 911 Calls*, CC Docket No. 94-102, at 2 and the Attachments thereto.

call back problem raised by the Public Safety Entities, CTIA urges the Commission to take the lead in working with the Public Safety Entities and the wireless industry to address this issue through education and training. In this regard, the efforts of CTIA's The Wireless Foundation should serve as the model for other organizations that donate wireless telephones to help victims of crime and domestic violence. The Wireless Foundation's guidelines specifically call for each phone to be activated on a wireless network with a unique telephone number. As a result, there are no technical impediments to calling back a properly commissioned phone used in The Wireless Foundation's "Call to Protect", "ClassLink", and "Communities on Phone Patrol" ("COPP") programs.

I. Technical Solutions to the Call back Problem Remain Illusive

In the *E911 First Report and Order*, the Commission recognized the disadvantages associated with requiring all 911 calls to be processed, and specifically noted concerns that calls from handsets without a code identifier may not provide usable ANI and call back, and that such handsets may facilitate hoax and false alarm calls.⁷ Based on the record before it at the time, the Commission acknowledged "that it is not currently possible for carriers to provide reliable call back numbers for all wireless 911 calls" and asked interested parties to address the evaluation and development of these capabilities in their annual status reports.⁸

In response to the Commission's request, the Wireless E 911 Implementation Ad Hoc ("WEIAD") group, consisting of representatives from the wireless industry, the public safety community, and consumer groups, convened a technical workshop to define

⁷ *E911 First Report and Order*, at ¶ 38.

⁸ *First Reconsideration Order*, at ¶¶ 109-110.

the problem and suggest possible courses of action.⁹ One year later, in its 1999 Status Report to the Commission, the WEIAD parties reported that with respect to efforts to solve the problems of callback to uninitialized handsets, “[t]he technical impediments that forced the policy choice of forwarding all calls ... have not yet been overcome.”¹⁰

Today, the WEIAD parties’ conclusion is still an accurate statement. Given the mobility of wireless users, and the use of a radio interface to connect users to carriers’ networks, the serving carrier must “validate” each user to establish the service features associated with the caller as well as generate a billing record and prevent fraud. In order to comply with the Commission’s rules,¹¹ wireless carriers’ networks either bypass or disregard the call validation process for 911 calls from non-service initialized handsets. The unfortunate result, under existing technologies, is that it is not technically possible to provide call back to a non-service initialized handset.¹²

As the Commission notes, the Ad Hoc Alliance proposed that wireless carriers issue a "Temporary Local Directory Number" ("TLDN") to support 911 call back.¹³ As

⁹ See Report of CTIA, PCIA, APCO, NENA, NASNA, ALLIANCE, CC Docket 94-102 (filed Jan. 30, 1998).

¹⁰ Report of CTIA, PCIA, APCO, NENA, NASNA, ALLIANCE, CC Docket 94-102 (filed Feb. 1, 1999), at 7.

¹¹ Wireless carriers “must transmit all wireless 911 calls without respect to their call validation process.” See Section 20.18(b), 47 CFR §20.18(b).

¹² See generally, Ex Parte Presentation of the Wireless E911 Coalition, CC Docket No. 94-102 (filed July 10, 1997); Comments of the Cellular Telecommunications Industry Association, CC Docket 94-102 (filed July 28, 1997); and Additional Comments of Southwestern Bell Mobile Systems, Inc., CC Docket 94-102 (filed July 28, 1997).

¹³ *First Reconsideration Order*, ¶ 109.

CTIA stated at the time this issue was first presented, TLDNs are used in a roaming environment, they are used solely for call delivery (and not call back) and are valid for only 20 seconds to facilitate call delivery.¹⁴ More importantly, TLDNs must be translated to a unique subscriber code in order to support call back. In the case of a non-service initialized subscriber, the TLDN would be mapped to the number programmed into the handset by the manufacturer or previous user. If the phone number is within the carrier's line range, given the pressure on numbering resources, there is an excellent chance that the number has been assigned to a new, service initialized, user. Since the new user is registered on the carrier's system, call back will be directed to the new user. If the phone number is not within the carrier's line range, call back would be routed to the carrier associated with the NPA-NXX programmed into the handset. Since that carrier has no record of the user, the call back could not be routed to the serving carrier.¹⁵ Moreover, the implementation of wireless Local Number Portability ("LNP") will further complicate resolution of this issue.¹⁶

The Commission was well aware of this problem,¹⁷ and adopted rules that provide for the different treatment of 911 calls from non-service initialized phones. Call validation, authentication, and registration are the keys to the Intelligent Network features

¹⁴ Comments of the Cellular Telecommunications Industry Association, CC Docket 94-102 (filed July 28, 1997), *id.* at 6-7.

¹⁵ Or, as noted in Part II, below, the phone number may be a non-dialable number which cannot be routed to any carrier.

¹⁶ See Comments of the Cellular Telecommunications Industry Association, CC Docket 94-102 (filed July 28, 1997), *id.* at 3-5.

¹⁷ See n. 5, *supra*.

of wireless networks. As the Commission recognized, in order to process all 911 calls, wireless carriers must bypass these functions, and in so doing, users of non-initialized phones also bypass capabilities provided users of service initialized phones. As noted below, education and training promise a better, and more timely, solution to these problems than a redesign of the core architecture of wireless networks.

II. New “911” Handsets Prevent Carriers from Providing Call back

While technical solutions at the network level remain illusive, specialized “911” handsets, designed solely to dial 911 on an uninitialized basis, have become a reality. Highlighting the dynamics of a competitive marketplace, at least one wireless handset manufacturer has responded to the Commission’s decision to require carriers to transmit all 911 calls by developing and marketing handsets specifically designed to dial 911, and only 911, without being activated by a carrier. CTIA purchased one such phone, the Magnavox Mobile911, after seeing it advertised in The New York Times.¹⁸ Since this phone is not designed to be activated, it is not marketed through carriers’ distribution channels. Instead, it is marketed through mass media advertisements,¹⁹ the Internet,²⁰ and affiliate sales channels.²¹ These distributors claim that the Magnavox Mobile911 has

¹⁸ See "*Why pay for cellular phone service if you need it only for emergencies?*", The New York Times Magazine, March 12, 2000, p. 70, attached as Exhibit 1.

¹⁹ *Id.*

²⁰ An Internet search for “Magnavox Mobile911” identified hundreds of web sites selling the phone. See Google Search, attached as Exhibit 2 (first 100 results).

²¹ See generally, Exhibit 2 at p. 3.

been featured on “The Oprah Winfrey Show”, “The Today Show”, CNN, NPR’s “All Things Considered”, and “The New York Times.”²²

CTIA submitted the Magnavox Mobile911 handset to Intertek Testing Services, an FCC designated Telecommunication Certification Body (“TCB”).²³ Intertek Testing Services found that the Magnavox Mobile911 “does not have a standby state and cannot be paged when powered down. ... When the 911 button is pushed the mobile turns on, finds a base station and originates a call. The number called by the mobile is 911. When the call is terminated by either the base station or the mobile, the mobile returns to its off state and cannot be paged.”²⁴ Indeed, one distributor highlights the fact that this phone cannot receive calls by stating: “Mobile911 is ideal for students, because it doesn’t disrupt classes with incoming calls.”²⁵

The Intertek Testing Services report also found that the phone number (*i.e.*, the Mobile Identifying Number) associated with the tested phone was a non-dialable number: 123-456-7890, and that the Magnavox Mobile911 phone will not register with a carrier’s system or accept a page.²⁶

²² See <<www.mobile911.com>>, attached as Exhibit 3.

²³ *Public Notice*, Office of Engineering and Technology and Common Carrier Bureau Announce the Designation of Telecommunication Certification Bodies (TCBs) to Approve Radiofrequency and Telephone Terminal Equipment, DA 00-1223 (rel. June 2, 2000). To be designated by the FCC, a TCB must be accredited by the American National Standards Institute.

²⁴ Letter Report, Intertek Testing Services, Project: CTIA - 00-25 (June 15, 2000), attached as Exhibit 4.

²⁵ See Exhibit 1; see also, <<www.comtrad.com>>, attached as Exhibit 5.

²⁶ Exhibit 4, *id.*

The widespread availability and use of handsets that are programmed with non-dialable numbers, that will not register with a carrier's system, and that are physically incapable of receiving a call, prove conclusively that technical solutions, even if they were available (which they are not) are not sufficient to address the legitimate concerns raised by the Public Safety Entities.

III. Education and Training Is the Key to Solving the Call Back Problem

Rather than pursue a futile search for technical solutions that are incapable of solving the call back problem raised by the Public Safety Entities, CTIA urges the Commission to take the lead in working with the Public Safety Entities and the wireless industry to address this issue through education and training. CTIA respectfully submits that the Commission has a duty to advise the public of the safety benefits associated with the use of service-activated handsets to call 911.

The specific issue raised by the Public Safety Entities is the lack of a valid call back number for "donated wireless telephones ... distributed by many organizations."²⁷ On April 6, 2000, the National Emergency Number Association ("NENA") sent a letter to the National Coalition Against Domestic Violence ("NCADV") that foreshadowed the Public Safety Entities' April 28, 2000, Ex Parte Request.²⁸ NENA's letter informs the NCADV of certain limits on the technical capabilities of the wireless phones used in the "Call to Protect" program, and offers NENA's assistance in reviewing the instructions provided users of these phones, as well as NENA's assistance in answering any questions

²⁷ See n. 6, *supra*.

²⁸ NENA's April 6, 2000, letter is attached as Exhibit 6.

regarding 911 services.²⁹ NENA is to be applauded for its commitment to such education and training efforts.

In this regard, the efforts of CTIA's The Wireless Foundation can serve as the model for other organizations that donate wireless telephones to help victims of crime and domestic violence. The Wireless Foundation, with the generous support of the wireless industry, has provided more than 32,000 handsets through the Foundation's "Call to Protect", "ClassLink", and "Communities on Phone Patrol" ("COPP") programs. Each of the sixty-three wireless carriers participating in these programs has received a detailed description of The Wireless Foundation's guidelines. These guidelines specifically call for each phone to be activated on a wireless network with a unique telephone number.³⁰ As a result, there are no technical impediments to calling back a properly commissioned phone used in the "Call to Protect" and "Communities on Phone Patrol" ("COPP") programs sponsored by The Wireless Foundation.

²⁹ See Exhibit 6. On May 5, 2000, The Wireless Foundation responded to NENA's letter. A copy of the Foundation's letter is attached as Exhibit 7.

³⁰ The Wireless Foundation's Guidelines for both the "Call to Protect" and the "COPP" programs instruct carriers to set up a subscriber account for each donated phone, and to program the phones for both 911 and one non-emergency number. Phones used in the "ClassLink" program are specifically intended to provide both inbound and outbound calls and are programmed like other service initialized phones.

Conclusion

CTIA shares the concerns raised by the Public Safety Entities. Rather than pursue a futile search for technical solutions that are incapable of solving the call back problem, CTIA urges the Commission to take the lead in working with the Public Safety Entities and the wireless industry to address this issue through education and training.

Respectfully submitted,

**CELLULAR TELECOMMUNICATIONS
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Its Attorneys

June 19, 2000

Exhibit 1

Why pay for cellular phone service if you need it only for emergencies?

Magnavox® Mobile911™ integrates wireless 911 communication and an emergency siren to create affordable and effective emergency help...without monthly fees.



The second our children come into this world...that's the second we begin to worry. And as they grow the list of worries grows right along with them. Some say you can only do so much to protect loved ones—your sixteen-year-old driving off for the first time, or your aging parents who are starting to feel insecure—but don't believe it. One of the most effective ways of protecting them is also one of the simplest. It's called Magnavox® Mobile911™, and it represents a new age in safety and security. Will it stop you from worrying? Of course not...but it just might help you worry less.

The personal safety solution. Magnavox Mobile911 is a revolutionary cellular communication device that calls 911 with the push of a single large button. This enables two-way voice communication with 911 operators. It also features two buttons that trigger a loud siren when pushed simultaneously. This makes the unit an ideal way to scare someone away and to attract attention in an emergency. Best of all, Mobile911 is the only wireless communication device that doesn't require any service fees or activation

costs. The purchase price is all you pay. It is, quite simply, the most effective and affordable way to get help in a potential or actual emergency situation.

Peace of mind in the palm of your hand. Law enforcement experts know that there are two basic rules to follow in an emergency situation: attract attention and call for help. Whether you want wireless 911 access for yourself, your children or your parents, you'll have the satisfaction of knowing that help is only the push of a button away. Security is the number one reason people buy cellular phones, but they involve activation charges, usage fees and service contracts. Personal sirens are designed for quick, effective use, but they are useless in a medical

The Mobile911 Advantage			
	Mobile911	Cell Phone	Guard Dog
Product Cost:	\$199 <small>(One-time Price)</small>	Free <small>(Best U.S. Price)</small>	Free <small>(From the Pound)</small>
Annual Service:	\$0 <small>(No Hidden Charges)</small>	\$454 <small>(Average U.S. Cell Bill)</small>	\$900 <small>(Not Including Training)</small>
Total Year 1:	\$199	\$454	\$900
Total Year 3:	\$199	\$1,362	\$2,700
Maintenance:	Check Batteries Once a Year	Charge Battery Weekly	Feed, Water, and Walk Daily

features a signal test button that allows you to verify that there is a signal available to call a 911 operator wherever you are.

Try it for yourself...it's risk-free. In this increasingly unsafe world, wouldn't it be nice to know that help is only the push of a button away? Mobile911 comes with a 90-day manufacturer's limited warranty from Magnavox and Comtrad's exclusive risk-free trial. If you are not completely satisfied for any reason, simply return it within 30 days for a full "No Questions Asked" refund.

Simple. Call 911 Button lets you talk to local 911 operator.

Anywhere. Nationwide Coverage works anywhere in the United States where analog cellular phones operate.

Smart. No Service Fees. No contract, monthly service fees, activation or roaming charges. Purchase price is all you pay.

MAGNAVOX Mobile911™

Smart. 95-decibel Siren. Push both buttons on the sides of the Mobile911 unit to activate siren for attention or help.

Smart. Long-Lasting Batteries. Always ready when you need it. Never needs recharging, just replace alkaline AAA batteries once a year. Four Duracell® Ultra Batteries included.

Detachable Clip included for belt or visor.

emergency. Mobile911 is perfect for a variety of users. Elderly people love it because there are no hidden costs and it is so simple to use. You can buy it for your teenager without worrying about them racking up big monthly bills. Mobile 911 is ideal for students, because it doesn't disrupt classes with incoming calls. Since it runs on ordinary alkaline batteries, you'll never have to hassle with recharging the unit. It includes four long-lasting Duracell Ultra AAA batteries, and it

Magnavox® Mobile911™
 Three credit card payments of . . . \$66.50 \$11.95 S&H
 Please mention promotional code 7502-17576.
 For fastest service, call toll-free 24 hours a day
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Exhibit 2



[Search Tips](#)
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Tip: In most browsers you can just hit the return key instead of clicking on the search button.

Google results 1-100 of about 520 for **Magnavox Mobile911**. Search took 0.29 seconds

Categories : [Society](#) > [Support Groups](#) > [Self Help](#) [Computers](#) > [E-Books](#)

Magnavox Mobile911 - get emergency help instantly

...911 Where can you get it? **Magnavox Mobile911 - get emergency help...**

...than most cell phones, the **Magnavox Mobile911** weighs only five...

www.hot.ee/mobile911/ - Show matches (Cache) - 7k - Similar pages

Magnavox Mobile911 - where can you get it?

...911 Where can you get it? **Magnavox Mobile911 - where can you get...**

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Show matches (Cache) - 1k - Similar pages

Mobile 911

...contracts to sign? Does **Magnavox Mobile911** work everywhere? How...

...decibels? How do I keep **Magnavox Mobile911** charged? Where can I...

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Magnavox Mobile911 Personal Safety Emergency Phone

... **Magnavox Mobile911** personal safety emergency phone...

...safety emergency phone **Magnavox Mobile911** Personal Safety Solution...

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Page Not Found

Requested page not found. We are sorry, but the URL you requested could not be found on

Description: Self-help and personal growth resource. How to become more self-confident, be successful in life,...

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Competitionpc Mobile 911

...for Shopping Online! NEW! **Magnavox Mobile911** Personal Safety...

...\$199.95 Click Here To Order **Magnavox Mobile911** Personal Safety...
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911 Mobile Cell Phone

...for emergencies? The **Magnavox Mobile911** Personal Safety Phone...
...95-Decibel Siren Alarm. Because **Magnavox Mobile911** is designed to...
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Save Easy!: Communication

...(Added: 29-Oct-1999 Hits: 109) **Magnavox Mobile911** - (Votes: 0...
...0) Rate This Store! The **Magnavox Mobile911** is a brand new,...
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business services - merchants at Which Affiliate.com

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...cyberstore. Buy now and get your **Magnavox Mobile911** phone free!...
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...seen on National TV! The **Magnavox Mobile911** personal safety phone!...
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...0) Rate It **Mobile911.com** - Do you like the **Magnavox**...
 ...then you qualify for the **Magnavox Mobile911** Affiliate Program!...
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Frame Main

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 ...connection capabilities, **Magnavox Mobile911** is ideal for groups of...
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...Deals! DIRECTV only \$54.95 **Magnavox Mobile911** Special Buys \$FREE\$...
 ...\$299.99 Add to Cart NEW! **Magnavox Mobile911** Personal Safety...
www.handtech.com/asp/storefront/cart/storefront.asp - Show matches (Cache) - 22k - Similar pages

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FREE for ALL Enterprise - Love long and party - LINKS

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...become a traffic magnet **Magnavox Mobile911** - get emergency help...
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...situation, you need help fast! **Magnavox Mobile911** provides that...
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Emergency Mobile 911 Phone: No contracts, no activation fees, no calling

...are **Mobile911** Phone Emergency Help When You Need It The **Magnavox**...
...charges. Many people buy **Magnavox Mobile911** for themselves, but it...
blakkat.com/shopping/stores/mobile.htm - Show matches (Cache) - 6k - Similar pages

Communication Equipment & Services

...your site Click here for **Magnavox Mobile911** The **Magnavox**...
...device. With the touch of a button, **Mobile911** lets you speak to a local...
www.sunsetmall.ca/conts/C/Communication.shtml - Show matches (Cache) - 17k - Similar pages

Communication Equipment & Services USA

...your site Click here for **Magnavox Mobile911** The **Magnavox**...
...device. With the touch of a button, **Mobile911** lets you speak to a local...
www.sunsetmall.ca/countries/usa/communication.shtml - Show matches (Cache) - 13k - Similar pages
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Lhp Communication:cheap calling cards, cell phones, long distance.

...calling card online. **Magnavox Mobile911** - We've dedicated...
...solutions we've come up with is **Magnavox Mobile911**. GET A FREE 50...
www.lhp2000.com/merchants/communication.html - Show matches (Cache) - 51k - Similar pages

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...www.transcriptservice.com **Magnavox Mobile911** - get emergency help...

...become a traffic magnet **Magnavox Mobile911** - get emergency help...
www.guessing-games.com/links/links.htm - Show matches (Cache) - 101k - Similar pages

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...types of pages AT ONCE!!! **Magnavox Mobile911** - get emergency help...
...become a traffic magnet **Magnavox Mobile911** - get emergency help...
www.wpglobal.net/links/links.htm - Show matches (Cache) - 101k - Similar pages

1stalea.com Best Picks
...Instant \$25 to \$100 rebate. * **Magnavox Mobile911 Mobile911**...
...anywhere. Also equipped with a siren, **Mobile911** uses cell phone...
www.1stalea.com/alea/best.htm - Show matches (Cache) - 101k - Similar pages

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...Instant \$25 to \$100 rebate. * **Magnavox Mobile911 Mobile911**...
...anywhere. Also equipped with a siren, **Mobile911** uses cell phone...
www.1stalea.com/mall/pages/1stAleaBusinessDistrict.htm - Show matches (Cache) - 46k - Similar pages
[More results from www.1stalea.com]

ABCNEWS.com : Crabby Traveler: Dumb Travel Gifts
...Neither do I. Safety First The **Magnavox Mobile911**, "a must...
...95-decibel siren on his phone. Message to **Magnavox**: Lose the horn...
www.abcnews.go.com/sections/travel/Crabby/crabby1214.html - Show matches (Cache) - 32k - Similar pages

Phone Call Mall - Cell Services
...products and solutions. **Magnavox Mobile911 Mobile911**...
...Also equipped with a siren, **Mobile911** uses cell phone technology but...
www.infostation.org/cell.html - Show matches (Cache) - 17k - Similar pages

On-line Store Fundraiser for Non-Profit Organizations
...for each phone. Join the **Magnavox Mobile911** program! IP5 sends \$10...
...purchase Join the FLOWERS USA program! **Magnavox** sends \$40 to the...
www.npofundraising.com/Fundraiser5.html - Show matches (Cache) - 21k - Similar pages

TimeshareValues.com For Sale
...and learn about the **Magnavox Mobile911** a brand new, patent-pending...
...device. With the touch of a button, **Mobile911** lets you speak to a local...
www.timesharevalues.com/For_sale.htm - Show matches (Cache) - 27k - Similar pages

Albuquerque and Santa Fe, New Mexico - Business
...description goes here **Magnavox Mobile911 - Mobile911**...
www.accessabq.com/business/ - Show matches (Cache) - 9k - Similar pages

Albuquerque and Santa Fe - Business - Services...minimum order or set-ups. **Magnavox Mobile911 - Mobile911...**www.accessabq.com/business/services/ - Show matches (Cache) - 6k - Similar pages[More results from www.accessabq.com]**eGroups : promoteplus Messages :Message 86 of 92**...paid-to-save-money/?em=Slanphear@w...,urSL3 331 **Magnavox MOBILE911...**...used nationwide. No service fees. **Mobile911** has been featured on the...www.egroups.com/group/promoteplus/86.html - Show matches (Cache) - 38k - Similar pages**Access Galaxy Mall Classifieds Classifieds: /Electronics/Cell Phones**...ADVANTSOLUTIONS@AOL.COM **Magnavox Mobile911** is BRAND NEW and cannot......found in stores! Demand for **Mobile911** has been overwhelming! Featured on...www.galaxymall.com/classifieds/cats/Electronics/Cell_Phones/ - Show matches (Cache) - 17k - Similar pages**assignments**...you wish. Other ideas are **Magnavox Mobile911** (local Knoxville...www.pstcc.cc.tn.us/distance_learning/mkt2200/assignments.htm - Show matches (Cache) - 23k - Similar pages**Clients**...Supplies Magic Vac Food Saver **Magnavox Mobile911** Affiliate Program...www.cj.com/clients/cli_mer.asp - Show matches (Cache) - 100k - Similar pages**Merchants**...Supplies Magic Vac Food Saver **Magnavox Mobile911** Affiliate Program...simplsite.cj.com/Branded/Merchant_List.asp - Show matches (Cache) - 100k - Similar pages**shopping malls, virtual malls, online malls, shopping**...Lucky's Casino MacMall **Magnavox Mobile911** Majic Vac Food Saver...www.5n10.com/slowload.htm - Show matches (Cache) - 100k - Similar pages**Telecommunication Long Distance and Calling Card Programs**...48 U.S. > Worldwide **Magnavox Mobile911** Personal Safety Device...www.earntoshop.com/comm.html - Show matches (Cache) - 47k - Similar pages**Yahoo! Business and Economy:Companies:Telecommunications:Wireless:Personal**...Iridium satellite network. **Magnavox Mobile911** - provides cellular...dir.yahoo.com/Business_and_Economy/Companies/Telecommunications/Wireless/Personal_Communications/Cellular_Telephones/ - Show matches (Cache) - 20k - Similar pages**Yahoo! Business and Economy:Companies:Emergency Services:Personal Emergency**

...personal response services. **Magnavox Mobile911** - provides cellular...
dir.yahoo.com/Business_and_Economy/Companies/Emergency_Services/Personal_Emergency_Response_Systems/ - Show matches
(Cache) - 5k - Similar pages
[More results from dir.yahoo.com]

Tae Kwon Do Forms Tae Geuk Forms CD ROM CD-ROM Web Hosting Windows NT

...Offers DIRECTV Only \$54.95 **Magnavox Mobile911** Personal Emergency...
Description: Tiger Arts provides high quality web hosting on Windows NT servers. Hosting for both business and...
Category: Regional > North America > ... > M > Memphis > Business and Economy > Computers
www.tigerarts.com/ - Show matches (Cache) - 43k - Similar pages

Virtual malls, malls, shopping malls, online stores

...Lucky's Casino MacMall **Magnavox Mobile911** Majic Vac Food Saver...
www.bargainjungle.com/slowload.htm - Show matches (Cache) - 99k - Similar pages

Regional Listings

...US \$16.00 - 04/04 23:08 **Magnavox Mobile911** Mobile Emergency Phone...
search-cache.ebay.com/regional/columbus/phones.html - Show matches (Cache) - 70k - Similar pages

Free For All Link Page

...Affiliate Game Error 404 **Magnavox Mobile911** - get emergency help...
www.globalnet21.com/links/links.htm - Show matches (Cache) - 101k - Similar pages

DailyDiva.com | Free For All Link Page

...Remodeling,Home, Improvement **Magnavox Mobile911** - get emergency...
dailydiva.com/links/links.htm - Show matches (Cache) - 101k - Similar pages

Click 'n' Save Online Shopping Links - Travel and Adventure

...Travel Guide Click here for **Magnavox Mobile911** maps.com - CLICK...
www.info-revolution.com/Travel.htm - Show matches (Cache) - 5k - Similar pages

General Hospital Links

...Currency in Web Marketing? **Magnavox Mobile911** - get emergency help...
www.serve.com/HeatherC/GHLinks/links.html - Show matches (Cache) - 101k - Similar pages

1st SPOT Telecommunication: Telephone companies, Long distance Operators and

...Telecom CELLULAR TELEPHONES **Magnavox Mobile911** -solutions to some...
www.1st-spot.net/topic_telecomm.html - Show matches (Cache) - 26k - Similar pages

Akeyplace.com: A Key Place for E-Commerce

...pictures on the web - FREE! **Magnavox Mobile911** Personal Emergency...
sites.netscape.net/charlesaki - Show matches (Cache) - 35k - Similar pages

Net DOMINATION FFA Links Page

...placement in search engines **Magnavox Mobile911** - get emergency...
www.netdomination.com/ffa/ - Show matches (Cache) - 38k - Similar pages

Distributors Needed

...NOW! Join NOW! Join the **Magnavox Mobile911** affiliate program! Join...
www.grandmaspantry.com/distributors.html - Show matches (Cache) - 32k - Similar pages

Yahoo! Business and Economy>Companies>Telecommunications>Wireless>

...Iridium satellite network. **Magnavox Mobile911** - provides cellular...
sg.yahoo.com/Business_and_Economy/Companies/Telecommunications/Wireless/Personal_Communications/Cellular_Telephones/ - Show matches (Cache) - 22k - Similar pages

Cellular Phones, Service Providers, Plans & Safety Equipment

...911 HELP!!! Click here for **Magnavox Mobile911** a brand new,...
www.ladypalm.com/phones.html - Show matches (Cache) - 8k - Similar pages

Family and Children

...products Click here for **Magnavox Mobile911** SmarterKids.com...
www.motherofallmalls.com/Family.html - Show matches (Cache) - 12k - Similar pages

Computers & Electronics--High Tech

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www.best4living.com/computers.html - Show matches (Cache) - 16k - Similar pages

homepages.go.com/~keynote1/millertech.html

...ordered through my page) NEW! **Magnavox Mobile911** Personal Safety...
Show matches (Cache) - 13k - Similar pages

Strategic Partners

...Supplies Magic Vac Food Saver **Magnavox Mobile911** Mailbank.com Make...
www.cyberhomepage.com/aaaa.html - Show matches (Cache) - 46k - Similar pages

International Discounted Long Distance Communications Services

...48 U.S. > Worldwide **Magnavox Mobile911** Personal Safety Device...
www.maxban.com/ldnet/longdistance.html - Show matches (Cache) - 41k - Similar pages

Travel -- How You Can Book Hotel Reservations, Plane Tickets, Cruises, Etc!

...Travel Safely With The **Magnavox Mobile911**, Which Allows You To...
travel.chaichana.com/ - Show matches (Cache) - 13k - Similar pages

Yahoo! Business and Economy>Companies>Security>Personal and Home>

...accountability systems. **Magnavox Mobile911** - provides cellular 911...

www.english.yahoo.com/hk/Business_and_Economy/Companies/Security/Personal_and_Home/Products/ - Show matches (Cache) - 10k - Similar pages

Key places to shop and save money on the web

...pictures on the web - FREE! **Magnavox Mobile911** Personal Emergency...

www.mall.mwci.net/psncap/mpc/ - Show matches (Cache) - 31k - Similar pages

Free For All Link Page

...www.transcriptservice.com **Magnavox Mobile911** - get emergency help...

216.71.105.31/links/links.htm - Show matches (Cache) - 101k - Similar pages

Birdhouses

Look out your window...see any birds? Did you know that sometimes birds find themselves looking for new real estate? The birds tree gets cut down or they find that is just to...

newcordlessphone.com/birdhouses.html - Show matches (Cache) - 22k - Similar pages

Mobile911 - \$50 Discount! Best Price Anywhere for Mobile911!

... **Mobile911** by **Magnavox** - On Sale Now! Save \$50 Through April 30,...

...following topics: **Mobile911** Mobile-911 Emergency 911 **Magnavox** Look...

www.gaylord-cs.com/mobile911_page2.htm - Show matches (Cache) - 9k - Similar pages

Mobile-911

...Mobile-911 **Mobile911** by **Magnavox** is on sale now! Save \$50 through...

...analog cell phone works, a **Magnavox Mobile911** will too. And you...

www.gaylord-cs.com/mobile-911.htm - Show matches (Cache) - 28k - Similar pages

[More results from www.gaylord-cs.com]

Anchors Online - Resources

...noise and call for help. **Magnavox Mobile911** lets you do both. With...

...price is all you pay! **Magnavox Mobile911** is the ideal portable...

www.deltagamma.org/resource/mobile911.htm - Show matches (Cache) - 7k - Similar pages

www.ShopWithPamela.com - Shop With Pamela!

...everyday! FEATURED ITEM: The **Magnavox Mobile911** Phone...

...Industrial and Custom Cases **Magnavox Mobile911** Phone HERE for All...

www.shopwithpamela.com/ - Show matches (Cache) - 13k - Similar pages

Electronics - find the best electronics

...Distributor Click here for **Magnavox Mobile911 Magnavox**...

...- Detachable clip lets you take **Mobile911** anywhere - Includes four...

www.amallforyou.com/electronics/ - Show matches (Cache) - 33k - Similar pages

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...nightmare Click here for **Magnavox Mobile911 Magnavox**...

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simplesiteUK - Affiliate Solutions and Directory, New Programs

...Adams Click here to join **Magnavox Mobile911** Affiliate Program The...

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www.simplesite.freewire.co.uk/251199.htm - Show matches (Cache) - 24k - Similar pages

Electronics

...pocket. Click here for **Magnavox Mobile911 Magnavox**...

www.tech-sol.net/interlinks/shop-elec.htm - Show matches (Cache) - 11k - Similar pages

The Computer Pro Home. Your Technology Solution Specialists

...With FREE Self Install Kits **Magnavox Mobile911** Personal Emergency...

www.technologytrainingcenter.com/home/ - Show matches (Cache) - 11k - Similar pages

Technology Buying Club! Buy PC's, Digital Cameras, Online Computer Training,

...Emergency and Safety Device - **Magnavox Mobile911** is a...

...for any of the following topics: **Magnavox Mobile 911** Personal Emergency...

www.bizweb2020.com/ - Show matches (Cache) - 10k - Similar pages

Zillionaire.com

...product! The revolutionary **Magnavox Mobile911** is a new portable...

...efforts.Read More! 01/11/2000 - Special **Mobile911** Millennium Offer!! 50%...

www.zillionaire.com/Members/ - Show matches (Cache) - 8k - Similar pages

Home Business Depot- Emergency related Affiliate Programs

...see the new additions) **Magnavox Mobile911** - is a brand new,...

...device. With the touch of a button, **Mobile911** lets you speak to a local...

homebizdepot.addr.com/emr1.html - Show matches (Cache) - 5k - Similar pages

ALMOST FREE

...\$24.95 (Value is \$325.00) **Magnavox Mobile911 Mobile911**...

...anywhere. Also equipped with a siren, **Mobile911** uses cell phone...

www.freethingz.net/almost_free.htm - Show matches (Cache) - 27k - Similar pages

Directory of Merchants offering Wireless Services

...pagers, and accessories. **Magnavox Mobile911 Mobile911**...

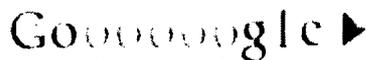
...anywhere. Also equipped with a siren, **Mobile911** uses cell phone...
www.shopheaven.com/shopping/wireless.html - Show matches (Cache) - 11k - Similar pages

Michael Brein's Travel Guides and Links
...Ride America on a Harley! **Magnavox Mobile911** - enables you to...
...anywhere. Also equipped with a siren, **Mobile911** uses cell phone...
www.michaelbrein.com/links.htm - Show matches (Cache) - 14k - Similar pages

Screeberey's Choice: communications, phones, faxes
...solutions we've come up with is **Magnavox Mobile911**. 379 © 1995-...
dawnrain.com/screeberey/phone.asp - Show matches (Cache) - 62k - Similar pages

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...minimum order or set-ups. **Magnavox Mobile911 - Mobile911**...
www.accessphoenix.com/business/services/ - Show matches (Cache) - 6k - Similar pages

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www.lifeplus-international.com/merchants/ - Show matches (Cache) - 23k - Similar pages



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