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WILKINSON ) BARKER ) KNAUER ) LLP

MAR 5 2001

FEDERAL COMMUNICATIONS COMMISSION  
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March 5, 2001

Magalie Roman Salas, Esq.  
Secretary  
Federal Communications Commission  
Room TW-A325  
445 Twelfth Street, SW  
Washington, DC 20554

Re: *IB Docket No. 99-67*  
Late-Filed/Ex Parte Submission -- Original Copy/Signature of Declaration  
Joint Supplemental Comments of Globalstar USA, Inc. et al.

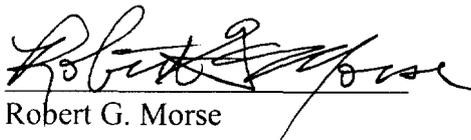
Dear Ms. Salas:

In their Joint Supplemental Comments submitted February 20, 2001, Globalstar USA, Inc., Globalstar, L.P., L/Q Licensee, Inc. and QUALCOMM Incorporated included a Declaration of Paul Guckian, Director, Engineering, for QUALCOMM Incorporated. Attached hereto is an original and four copies of the Declaration.

Please contact the undersigned if you have questions regarding this filing.

Sincerely,

WILKINSON BARKER KNAUER, LLP

By:   
Robert G. Morse

cc: ITS

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QUALCOMM Incorporated

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## **DECLARATION OF PAUL GUCKIAN**

I, PAUL GUCKIAN, state as follows:

1. I am a Director, Engineering for QUALCOMM Incorporated. In this position, I am responsible for identification and assuring compliance with technical regulatory requirements for the Gateway and Phone Products manufactured and sold by QUALCOMM Incorporated.
2. I graduated in Electrical and Electronic Engineering from Napier University, Edinburgh, Scotland in 1983 and have been working in the field of Electromagnetic Compatibility (EMC) and regulatory engineering for over 14 years. I have held a position with QUALCOMM Incorporated since June 1996 and currently lead the corporate EMC and Regulatory department. In this role I have worked extensively with the FCC to ensure that the QUALCOMM Incorporated products are designed and certified in compliance with the Commission's rules.
3. Through my current position and industry and educational experience, I am knowledgeable about issues relating to the design and capabilities of the Gateway and Phone Products manufactured by QUALCOMM Incorporated and used by Globalstar USA, Inc. and Globalstar, L.P. in operating the Globalstar network.
4. The Federal Communications Commission ("Commission") has proposed in a Public Notice to require providers of Mobile Satellite Services, such as Globalstar USA, Inc., to implement various Basic and Enhanced 911 emergency calling capabilities. I have read and am familiar with the Commission's proposal.

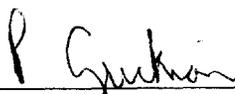


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5. I have reviewed the foregoing Joint Supplemental Comments ("Comments") and have personal knowledge of the facts contained therein as they relate to the handset and fixed earth station (Gateway) facilities utilized by Globalstar USA, Inc. and Globalstar, L.P. In my opinion and to the best of my knowledge, the foregoing Comments accurately discuss the potential engineering and cost difficulties of implementing the Basic or Enhanced 911 emergency calling capabilities described in the Public Notice.
6. I hereby state that the facts contained in the foregoing Comments and in the instant declaration are true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
PAUL GUCKIAN

Dated: <sup>20</sup>~~16~~ February 2001