

UNITED STATES GOVERNMENT

Memorandum

Date: February 22, 2002

To: William F. Caton
Acting Secretary
Federal Communications Commission

From: Arthur Lechtman
Satellite and Radiocommunication Division
International Bureau
Federal Communications Commission

Re: *Ex Parte* Meeting in IB Docket No. 99-67

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

This memorandum and one copy are being filed in accordance with Section 1.1206 of the Commission's rules.¹ On February 8, 2002, at the invitation of Commission staff, representatives of several satellite companies met at the Commission's Washington, D.C. headquarters to update the record in IB Docket No. 99-67,² and in particular discuss any methods that carriers are currently using to process their subscribers' emergency calls. The following companies were represented at this meeting, organized by staff from the International Bureau's Satellite and Radiocommunication Division ("SRD"): Globalstar USA, Inc. and Globalstar L.P. ("Globalstar"), Inmarsat Ltd., Iridium Satellite, Mobile Satellite Ventures Subsidiary LLC ("MSV," formerly Motient Services Inc.), and Stratos Global Corporation (the "Satellite Parties"). Attachment A to this memorandum identifies the specific individuals who attended the meeting. A list of topics for discussion was distributed at the meeting and is also attached to this memorandum, as Attachment B.

The *Satellite 911 Public Notice* sought comment on whether emergency satellite calls "might be routed to central operators, who could redirect the calls to the appropriate emergency response agencies. . . ."³ The SRD invited the Satellite Parties to speak about

¹ 47 C.F.R. § 1.1206.

² See Amendment of Parts 2 and 25 to Implement the Global Mobile Personal Communications by Satellite (GMPCS) Memorandum of Understanding and Arrangements, *Notice of Proposed Rulemaking*, 14 FCC Rcd. 5871 (1999) and International Bureau Invites Further Comment Regarding Adoption of 911 Requirements for Satellite Services, *Public Notice*, 16 FCC Rcd. 3780 (2000) ("*Satellite 911 Public Notice*").

³ See *Satellite 911 Public Notice*.

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procedures, such as call centers, that they currently have in place to process emergency calls made by subscribers. The remainder of this memorandum summarizes the information that was shared at the February 8 meeting.

MSV

MSV subscribers dial 911 on their handsets to access emergency assistance. MSV has two call centers to which all 911 emergency calls are directed. 911 calls placed by MSV's Motient customers are routed to a call center located in Reston, VA. Trained operators at the Reston call center request the caller's phone number and location, then cross reference the location information with a national Public Safety Answering Point (PSAP) database to determine which PSAP should be connected to the caller. 911 calls placed by MSV's TMI customers are routed to a call center in Ottawa, Canada.

Globalstar

- Globalstar created ECAS, the Emergency Call-Assistance Service, to handle emergency calls. On their handsets, Globalstar customers dial 911 or any of the international emergency dial codes (such as 112) to access emergency assistance. Dialing any of these codes connects the caller immediately to a recording and then (within 20 to 40 seconds) to a call center located in Canada. A third party Canadian vendor operates the call center. Trained operators first ask for the caller's phone number. The operator then instructs the caller how to use the handset to obtain his/her latitude and longitude coordinates, which are determined by GPS receivers in Globalstar's satellite constellation and software at Globalstar's gateway. The Globalstar system can determine a caller's location to within 10 kilometers, 90% of the time (sometimes the accuracy may be higher or lower). The time from when the caller initiates the key sequence to obtain coordinates until the display of coordinates on the handset screen is five to 10 seconds. After the coordinates are displayed, the operator asks the caller to read them. The operator then enters the coordinates into a national PSAP database that finds the most appropriate PSAP based on the caller's location. After the PSAP is determined, the operator conference calls the PSAP and stays on the line until the call is connected and the PSAP operator has obtained the caller's number and coordinates. The conference call is made through use of conventional telephone equipment connecting to the public switched network (*i.e.*, no trunk lines are used to establish a connection to the PSAP or to a LEC's selective routers). If the PSAP that the call center has conferenced in is not the most appropriate one (*e.g.*, if the wrong county's fire department was called), Globalstar expects that the PSAP itself will forward the call to the appropriate emergency personnel.
- Emergency calls placed by callers located in both Canada and the United States are routed to the Canadian call center. The call center has databases of both Canadian and U.S. PSAPs (containing names and coordinates of each PSAP). Globalstar does not have PSAP database information for Mexico and the Caribbean and thus does not process emergency calls made from these regions. Thus, if a subscriber makes a 911 call from, for instance, Puerto Rico, the caller would hear a recorded message saying that the network cannot process the call.

- The availability of ECAS is advertised to Globalstar customers and is described in subscriber manuals.
- Globalstar's handsets are dual-mode (satellite and cellular). The satellite transceiver operates when a cellular signal cannot be detected. Globalstar's satellite network processes an average of 12 emergency calls per month. In July 2001, the number of satellite emergency calls reached a high of 22. The company has received no complaints in regard to ECAS.
- With regard to the dual-mode handsets, Globalstar noted that calls made on the satellite portion of the network do not automatically transfer to the terrestrial cellular system (for instance when the satellite signal fades), nor do cellular calls similarly transfer automatically to the satellite network. If a call is dropped or the caller desires to change networks, the handset must be hung-up and redialed.
- Globalstar also discussed liability concerns connected with provision of emergency call service in light of the fundamental differences between global MSS systems and more localized terrestrial wireless systems.

Inmarsat Ltd.

- Inmarsat pointed out that it is not a competitor for typical terrestrial Commercial Mobile Radio Service ("CMRS"). While Inmarsat's customers may use the service for emergency communications, Inmarsat does not provide 911 emergency access.
- Inmarsat's earth terminals do not have GPS receivers.

Iridium Satellite

- Iridium does not process 911 emergency calls, nor has it processed them in the past. Any subscribers who dial 911 will hear a recorded message that says the call cannot be completed. Iridium does not currently have plans to use or implement emergency call centers.
- Similar to the Globalstar constellation, Iridium's constellation can determine the location of a caller with an accuracy of approximately 10 to 20 kilometers. This location information is used to keep track of subscribers for billing purposes.
- Iridium has no current plans to install GPS receivers on subscriber handsets.

Stratos Global Corporation

- Todd Lantor, representing Stratos, said he would share the discussion topic list with the appropriate parties at the company.

Attachment A

Parties Attending February 8, 2002 Meeting re: IB Docket No. 99-67

Thomas Tycz, Chief, Satellite and Radiocommunication Division, International Bureau
Karl Kensinger, Satellite and Radiocommunication Division, International Bureau
Arthur Lechtman, Satellite and Radiocommunication Division, International Bureau
Sankar Persaud, Satellite and Radiocommunication Division, International Bureau
Scott Kotler, Satellite and Radiocommunication Division, International Bureau
Marilyn Simon, Satellite and Radiocommunication Division, International Bureau
Alexandra Field, Senior Legal Advisor, International Bureau
Blaise Scinto, Deputy Chief, Policy Division, Wireless Telecommunications Bureau
David Siehl, Policy Division, Wireless Telecommunications Bureau
Patrick Forster, Policy Division, Wireless Telecommunications Bureau
Tim Cooney, Wilkinson Barker Knauer, LLP for Globalstar USA, Inc.
William Wallace, Crowell & Moring LLP for Globalstar, L.P.
David Weinreich, Globalstar, L.P.
John Janka, Latham & Watkins for Inmarsat Ltd.
John Rice, Iridium Satellite
David Konczal, Shaw Pittman for Mobile Satellite Ventures Subsidiary LLC
Todd Lantor, Steptoe & Johnson LLP for Stratos Global Corporation

Attachment B

IB Docket No. 99-67

Status Conference: February 8, 2002, 10:30 a.m., Room 5-B516

Topics for Discussion

- Does your company presently offer a means for subscribers to place an emergency call for assistance?
- If your company offers emergency assistance, is it provided by means of a central call center to which all emergency calls are routed?
- To the extent that you have an emergency call center, how are operators trained? How many operators are on duty at any given time? Where is the facility, or are they deployed regionally?
- How many emergency calls do you receive on a monthly basis?
- To the extent your company uses an emergency call center, how do operators connect callers with the proper PSAPs? Have you encountered any significant call routing problems?
- To the extent you offer emergency calling services, what number do subscribers dial to access it?
- Have any unique emergency call routing problems been encountered with regard to U.S. calls being processed by foreign-located gateways?
- If you provide service in other countries, please describe any emergency call procedures you have established there.
- If your company processes emergency calls without the use of call centers, how is this accomplished?
- Please describe the costs involved in maintaining your emergency call system.
- If your company does not provide emergency call capabilities, how is this communicated to subscribers?