

May 21, 2002

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: In the Matter of )  
Year 2000 Biennial Regulatory Review -- ) **WT Docket 01-108**  
Amendment of Part 22 of the Commission's )  
Rules to Modify or Eliminate Outdated Rules )  
Affecting the Cellular Radiotelephone Service )  
And Other Commercial Mobile Radio Services )

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, Chet Huber, President; William L. Ball, Vice President Public Policy; and Steven P. Schwinke, Director Systems Operations, representing the OnStar Corporation, submit this notice in the above-captioned proceeding of an ex parte meeting on May 20, 2002, with James Schlichting, Deputy Chief; Roger Noel, Deputy Chief Commercial Wireless Division; and Linda Chang all with the Wireless Telecommunications Bureau. The purpose of the meeting was to discuss OnStar's position regarding the analog compatibility standard.

The meeting opened with a brief explanation that OnStar combines cellular communications with GPS technology and integrates them into the electrical architecture of the vehicle. OnStar's service offerings were reviewed including OnStar Personal Calling and OnStar call center services including automatic crash/airbag deployment notification (ACN) and other emergency services. OnStar's transition to digital technology was discussed. As a part of this discussion, it was noted that OnStar is currently an analog based service. More specifically it was noted that analog is the state-of-the-art for the transmission of data and voice on the same call because there is currently no standard or robust method in digital networks to discriminate between data and voice on the same call.<sup>1</sup> This capability is required in offering automatic airbag deployment notification, emergency and other location-based services that are the cornerstone of OnStar's embedded telematics offering as well as in transmitting data to support remote diagnostics and other capabilities. OnStar noted that its initial system included a TDMA

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<sup>1</sup> This issue and the others discussed are described in more detail in the July 2, 2001 comments, August 1, 2001 reply comments and ex parte of March 28, 2002 filed by OnStar in FCC Docket No. WT 01-108.

implementation but that the TDMA mode was never capable of transmitting emergency calls because of the inability to discriminate between the data and voice portions of emergency calls and was eventually disabled to protect the ability of the system to complete emergency calls.

OnStar discussed its digital development and rollout strategy. The discussion noted that in addition to working to solve the data and voice problem, OnStar's embedded digital development targets are more complex than a handset because of the need to maximize the probability of completing an emergency or ACN call and the automotive environment in which the system operates. Examples of the special development targets were discussed including a development target of 3-watt analog capability while adding the 0.6-watt digital capability. The importance of nationwide coverage to telematics was also discussed.

In addition, OnStar expressed the belief that any change to the analog compatibility standard should also take into account the investment by the owners of the current fleet of vehicles with analog systems. OnStar reiterated its recommendation that the Commission should not take action that would potentially strand that consumer investment before the owners have an opportunity to benefit from the investment for a reasonable period of time considering the average ownership and lease periods of vehicles over their product life.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

William L. Ball  
Vice President, Public Policy

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