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May 28, 2002

Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, DC 20554

Re: ***Ex Parte Presentation***:
IB Docket No. 99-67
RM No. 9165

Dear Ms. Dortch:

Inmarsat Ventures plc submits this letter to provide further information about the absence of E-911 capabilities on the mobile earth terminals that are used to communicate with the Inmarsat MSS network.

As an initial matter, it bears emphasis that the Inmarsat system is not used to provide a service that is directly competitive with the types of handheld PCS or cellular telephones widely used throughout the U.S. today. Almost 250,000 terminals are registered for use on the Inmarsat system worldwide. Inmarsat terminals are either permanently mounted devices located on ships or airplanes for maritime or aeronautical mobile satellite services, or are portable/transportable devices that are used for land mobile satellite services. Some Inmarsat portable/transportable terminals are as small as a notebook computer, and others are as large as large briefcase. No Inmarsat terminals are handheld, portable devices that are similar to a cellular or PCS phone. And while Inmarsat terminals support voice services, they are widely used for many other purposes, such remote broadcasting feeds, data transmissions, and safety services—purposes for which there is no expectation or need of an E-911 functionality.

The following is a brief explanation why those terminals do not support "911" dialing.

Inmarsat has always used a numbering scheme for its mobile terminals based on the international country codes and numbering formats described by ITU-T Recommendations E.164 and E.215, and will continue to use this scheme in the future. Because of this, Inmarsat

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terminals do not operate within the national telecommunications system of the USA, or any other country. Specifically, Inmarsat uses country code 870 (and 871 to 874 on a temporary basis) and does not use any one country's national numbering scheme.

The use of the code '870' provides Inmarsat terminals the ability to roam globally and still be accessed by the international telephone network. A call made to an Inmarsat terminal appears to be a call made to another country because the international code 870 must be used at the beginning of the dialed number. Likewise, to initiate a call from an Inmarsat terminal, the user must dial an international number (i.e., the call must start with a recognized country code). A user *cannot* dial simply a national number (including short codes for emergency calls, e.g., 911, 112, 999). Moreover, no current Inmarsat terminal has the ability to indicate where it is located (there currently are no GPS capabilities built into Inmarsat terminals). As a result, the system does not know where to route an emergency call made from an Inmarsat terminal.

This means that a mobile Inmarsat earth terminal located in one country *cannot* make a short code (911, 112, 999) call to emergency services in that country. If international standards were implemented for such calls, this might be possible in the future, but no such standards have yet been developed at the ITU.

In summary, from the perspective of the provision of voice service, a call to or from an Inmarsat terminal is effectively a call to or from another country regardless of where the user is physically located. Inmarsat mobile portable/transportable terminals *do not support* short code emergency calls to specific countries. But an Inmarsat terminal user could make a call to a PSAP, by dialing an international number *if* the caller knows the country and PSAP region in which he or she is located, and what the appropriate number is.

Of course, despite these technical barriers to using an Inmarsat terminal for 911 calls, having a satellite terminal on which you need to dial an international number for help is better than not having any means to call for help. If the user does not have a cellular or PCS phone, or is out of range of those terrestrial systems, he or she still has the ability to use an Inmarsat terminal to seek assistance by calling a family member, friend, or co-worker.

Inmarsat is working closely with third party manufacturers to develop next-generation terminals to be used with the new Inmarsat-4 spacecraft. Inmarsat expects those terminals to have GPS location-determination capabilities. However, Inmarsat does not currently plan to deploy on its system handheld, portable devices like a cellular/PCS phone. Inmarsat expects that many of the almost 250,000 existing Inmarsat terminals will continue to be used for the foreseeable future, and therefore would not be able to comply with any E-911 mandated technical capabilities.

An original and three copies are enclosed.

Respectfully submitted,

John P. Janka

cc: Thomas S. Tycz
Blaise Scinto
Artie Lechtman