

August 1, 2002

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th 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Rules to Modify or Eliminate Outdated Rules)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:

The following ex parte comments in the above captioned matter are submitted on behalf of General Motors Corporation and OnStar Corporation.

On Wednesday, July 31, 2002, General Motors announced that GM would begin offering Advanced Automatic Crash Notification (AACN) starting with selected OnStar equipped GM vehicles in the 2004 Model Year. This new system will be incorporated into vehicles utilizing embedded analog OnStar telematics as well as vehicles with embedded digital telematics assuming successful completion of development and validation of the digital telematics technology.

AACN will expand dramatically the crash data available to OnStar to pass on to PSAPs and will include data regarding the crash severity and direction of impact, the crash pulse, and other medically significant crash information. It will also increase the number of crash incidents for which automatic notification will be received by OnStar including, for example, rear impact crashes above a predetermined threshold. A copy of the GM press release is attached.

General Motors and OnStar continue to believe that the record in this matter - considering (1) the consumer investment in and public safety benefits of analog embedded telematics systems in the legacy fleet including this added capability; (2) the developmental state of digital telematics technology; and (3) the lack of ubiquitous digital coverage - supports consideration of a transition period three to five years longer than the five years advocated by some commenters if the Commission decides to sunset the analog compatibility requirement.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

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GM WILL OFFER ADVANCED AUTOMATIC CRASH NOTIFICATION IN 2003

Partnered with OnStar, technology will help save lives by getting the right emergency resources to crashes faster

WASHINGTON, D.C. – When a vehicle crash occurs, a quick medical response often can mean the difference between life and death. In an effort to help 911 centers dispatch the appropriate life-saving staff and equipment to crash scenes faster, General Motors will begin adding an advanced automatic crash notification (AACN) system to vehicles equipped with OnStar, the first automaker to do so.

Currently, OnStar, an embedded in-vehicle safety and security communications system, is automatically notified within seconds when a subscriber's air bag deploys. The next-generation GM automatic crash notification system linked with OnStar will assist even more customers by taking this potentially life-saving service beyond air bag deployments. Using a collection of strategically located sensors, the GM AACN system will automatically call for help if the vehicle is involved in a moderate to severe frontal, rear or side-impact crash, regardless of air bag deployment. Also, the new system provides crash severity information to OnStar call center advisors, who relay it to 911

dispatchers, helping them to quickly determine the appropriate combination of emergency personnel, equipment and medical facilities needed.

“With the new technology of this enhanced GM crash notification system, we have a tremendous opportunity to save more lives,” said Robert C. Lange, GM executive director of vehicle safety. “AACN will assist emergency personnel in determining crash severity in those precious minutes following a crash, and help get the right people to the scene faster.”

Dr. Rick Hunt, M.D., is president of the National Association of EMS Physicians and professor and chair of emergency medicine at SUNY Upstate Medical University in Syracuse, N.Y. He recalls instructing EMS workers in the 1980s to take instant photos of crashed vehicles so that he could correlate possible patient injuries with the damage to the vehicle. “Until then, patients would be brought to the emergency department and we had no information on the crash at all. For \$2 worth of film we got a huge amount of data.

”The wonder of AACN technology is that it will give us more crash information than ever before - a high-tech crash ‘photo’ - which helps us take better care of our patients. The National Association of EMS Physicians and I look forward to working with GM and OnStar as they lead in the introduction of this technology in the auto industry.”

The AACN system works by using new and existing sensors in conjunction with advanced intelligence to transmit key crash data including the direction of impact and the impact force. Impact force is one of the most important pieces of data used to determine the severity of a crash.

When the AACN system is triggered by a crash of sufficient severity, an emergency voice/data connection will be established with an OnStar call center. The advisor will use the voice channel in the vehicle to communicate with the crash victims and, at the same time, conference-in the nearest public service answering point (911 dispatcher) and provide specific data about the severity of the crash. The 911 dispatcher can then inform emergency responders of the data. In the future, AACN data may be transmitted electronically to the 911 centers, emergency responders, emergency departments and trauma centers using secured internet connections.

Eventually, the system may be capable of determining how many occupants are in the vehicle, whether they are using safety belts and other information that helps emergency responders further anticipate the types and severity of injuries that may have occurred in a crash.

“All of us at OnStar are excited to be a leading partner in this extremely important life-saving advancement,” said Chet Huber, president of OnStar. “The AACN technology combined with OnStar’s embedded, high-tech systems of GPS satellite technology and powerful wireless communications, demonstrates OnStar’s core commitment to providing industry-leading in-vehicle safety and security services.

“Without the embedded OnStar system, the benefits of AACN would not be realized.”

OnStar currently receives about 500 air bag deployment notifications per month. In addition to responding to air bag deployments, OnStar advisors receive about 14,000 roadside assistance requests per month.

The GM AACN system will be available beginning in 2003 on about 400,000 OnStar-equipped 2004 model year vehicles, including the Chevrolet Malibu,

Chevrolet TrailBlazer, GMC Envoy and Envoy XUV, Oldsmobile Bravada and the Buick Rainier. AACN will be added to additional GM model lines equipped with OnStar in subsequent model years.

The system will be rolled out into vehicles sold in the U.S. and Canada.

Emergency care providers, physicians and trauma surgeons have been calling for technology such as the GM AACN system. Although deaths from vehicle crashes have stabilized in recent years, deaths at the crash scene prior to the arrival of emergency care providers have doubled in the last 20 years and now exceed 20,000 per year, according to the ComCARE Alliance, a nonprofit group of emergency medical personnel, telematics service providers, the wireless industry and safety advocates.

Many of these fatalities are in rural areas, where 20 percent of the nation's total annual crashes and 60 percent of the fatalities occur. Experts say that advanced automatic crash notification may be especially important in these rural areas, where there may be no passersby to report a crash and few local hospitals equipped to treat the kinds of injuries sustained in severe crashes. An AACN system, for example, could help emergency responders decide sooner to dispatch special aid to these victims, such as evacuation by helicopter to a regional trauma center.

General Motors (NYSE: GM), the world's largest vehicle manufacturer, designs, builds and markets cars and trucks worldwide, and has been the global automotive sales leader since 1931. GM employs about 355,000 people around the world. More information on General Motors can be found at www.gm.com

OnStar, a wholly owned subsidiary of General Motors Corp., is the nation's leading provider of in-vehicle safety, security and information services using the

Global Positioning System (GPS) satellite network and wireless technology. With more than 2 million subscribers, OnStar services include automatic notification of air bag deployment, stolen vehicle location, remote door unlock, emergency services dispatch, roadside assistance, remote diagnostics, route support, convenience services and OnStar Concierge. OnStar Personal Calling allows drivers to make, receive and access personalized information all in a hands-free, voice-activated manner with no screens or displays. Additional information is available at www.onstar.com.

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