

December 2, 2002

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
Office of the Secretary
445 – 12th Street, S.W. - Room TW-A325
Washington, D.C. 20554

Re: CC Docket No. 02-46

**REPLY to “NENA, APCO AND NASNA comments on the Hatfield E911 Report”, dated
November 15, 2002**

Dear Ms. Salas,

This is to reply to the following comments presented by NENA, APCO and NASNA:

1. I refer especially to page 3 para 2 line 8 onwards: **“Ultimately, the emergency telecommunications process must use a protocol designed for constant voice and data processing – such as Internet Protocol (“IP”). We discuss further below NENA’s “Future Path Plan” which has anticipated many of the suggestions in the Hatfield Report.”**
2. **“In final analysis, carriers need to be leaders, not followers in this effort”**

I am reminded about American history where it was the success of the aggressively independent settlers that ignored the safety of the established forts created by the government agencies, taking risks that in turn set into place the foundation stones of this so vigorous society. Rules are for the guidance of wise men, and always have been so. If we set out to create rules with rigid requirements, the wise will always minimize those self same requirements; but it will always be those that show the courage to hit their shovel into new ground that will ultimately lead any strong society forward. There are no rules for working in new ground other than the need to stand Full Square and throw the shovel at it. The moment you add rigid rules, you defeat the elegance of the process and debase the efforts of the best you have.

There have been two things missing from the E911 proposals from the outset.

- The challenge to create the maximum benefit through available technology
- The recognition that leadership is not about setting rigid rules

If the United States Air Force had set out in the same way as E911, there would be steam powered aircraft trying to take off at Edwards Air Force Base today and with a man carrying a red flag walking at snails pace in front of the aircraft. History shows us clearly that you do not lead any successful industry into new areas of technology by standing in front holding a rule book in one hand and a stick in the other. When Thomas Alva Edison set out to electrify New York, he did not need a set of rules; he got on with the job and modified his thinking as the exercise expanded. Experience quickly gained was just as quickly put into practice. The result was that much of the United States was electrified very quickly indeed.

Today the United States of America is arguably some years behind the curve in the deployment of the best available wireless technologies. Countries such as Korea and Japan are careening

ahead and their best young minds are full tilt developing services and new businesses at a breakneck pace. The largest supplier of wireless network equipment is not American. The largest manufacturer of wireless telephones is not American. The largest market for both equipment and services is not American. Yet, in my humble opinion, you do not have a bigger business opportunity on the planet today.

I challenge everyone to go into the street and ask the average citizen; what E911 is? Go on, try it? You will find that very few indeed have the foggiest notion what E911 is. You get not much better fare if you ask the question in a wireless telephone shop. There lies your first great challenge. Here we have arguably a fantastic opportunity to lead a new market in technology and we have not even had the imagination to carry the ordinary people with us into the battle. Strong words yes; but I would not use them if I felt that the day was lost. So what has to be done to catch up?

We must first of all recognize that, with such a long term project, now some eight years into the program, the teams trying to set this all in place today are not the originators; there is no one to be blamed, or take blame. Time has marched on and the original concept, while at the outset was very laudable, today it is largely obsolete. Why? - Because the original thinking did not foresee the rapid development of digital technology, particularly, digital imaging, and, just as importantly, no one at the regulatory level recognized the importance of the Global Positioning System, (GPS), and the great strides that would come from setting out to develop small GPS receivers which could be integrated into a wireless telephone chipset. That it would be easily possible to integrate a digital camera and GPS navigation into a wireless telephone.

So the starting point is to set about catching the imagination of everyone, not with an obsolete concept, but by raising everyone's eyes to the challenge of tomorrow's technology. We must start by lighting the road with new thinking.

THE GPNS MULTI-MEDIA PERSONAL SECURITY SERVICE Is a personal safety service that makes use of a wireless telephone, digital imaging, position location and local franchised call centers to provide a wide ranging personal security service. We call our service VIDEO 911. Video 911 is capable of being implemented immediately. When the GPNS VIDEO 911 service is launched It will make the current E911 proposals OBSOLETE. This document is presented as an opening statement of our service concept And an Invitation to potential Partners, Investors and participating Service Organizations.

Video 911 is the classic innovative insurgent

GPNS Corporation is at the heart of the debate about the wireless telecommunications industry redirecting its thinking. We believe that there are benefits to be gained by refocusing on the base market for wireless, safety.

The wireless industry has been devastated by a combination of external factors and has reached a turning point. Capital markets are in denial and technology trends, that so recently seemed set to carry forward great profitability, have been seen to need more time to mature. On top of that has been added E911, which was sold as the preferred solution to the need for the emergency services to know the location of a wireless user. The problem is that the E911 initiative has stalled. Further, the FCC did not foresee the rapid development in wireless digital imaging that

has now started to drive the industry into new markets world wide. Thus there is an urgent requirement to implement E911 at great cost to the nation while at the same time, E911 without imaging will be shown to be obsolete as soon as the GPNS system, Video 911, (with added imaging), is launched.

By proposing a digital imaging based solution to E911 that overcomes the technical difficulties, particularly those faced by the GSM carriers, we have the potential to deliver stability to the finances of the industry.

Thus the overall challenge at this stage is to energise the industry into recognising the potential.

How do we do that?

GPNS Will:

- Create a strong business organisation through a number of well placed strategic partnerships and or acquisitions.
- Take into that core business expertise from the carriers that will lead with us, individuals with the necessary clout to see this to fruition.
- Set into motion the demonstrations needed to show the viability of what is proposed.
- Galvanise all levels of the industry with a well thought out and strong publicity campaign.
- Ensure that there are adequate levels of capital available.
- Take the initiative to lead in the rapid upgrade from the existing E911 proposals to a nationwide full digital image solution – Video 911.

By taking these bold steps GPNS Corporation's VIDEO 911 business will drive a US based solution that will be seen as the future standard for the rest of the industry world wide. To take this from the conceptual stage will require a capital input that will be sufficient to permit the creation of a full and professional business plan. We propose that this first stage be the subject of discussion now and that the production of the detailed business plan shortly thereafter will result in justifying a further capital injection to take this to fruition.

The Company proposes that it will set in place the necessary corporate infrastructure to support the development of a full team drawn from the wireless industry. This team will be tasked to create a business plan that will put into effect what we propose. Secondary developments will take place with the target of a full demonstration of a suitably designed handset that incorporates a digital camera and a navigation system and the transmission of an image to a call center. We propose that the first stage is completed within one year from now.

Capital funding to be provided from the initial sponsors up to a level to be agreed.

GPNS has US and Foreign Patents covering all aspects of its Service ensuring not only ease and efficiency of implementation but also full protection during the roll out period.

We expect to drive a revolution in the wireless industry and that this will be a very profitable option for the carrier.

THE GPNS MULTI-MEDIA PERSONAL SECURITY SERVICE

VIDEO 911

Overview of Company

GPNS Corporation (or “the Company”) is a Washington D.C. incorporated start-up company (October 2001). The majority shareholder, Chris F. Coles, an internationally known U.K. inventor, author, publisher and businessman, is the holder of three (3) United States patents and one (1) Japanese patent for a personal security system based upon wireless telephony. The system allows a photograph and navigational information to be sent and displayed anywhere the user wishes. The Patents are for a full system rather than just a device and they cover every aspect of future technology needed; the operating system, software, voice activation, (for example), taking the photograph, navigation, and the transmission to a remote receiver. The claims cover all aspects of the 3G system.

The business model contemplated is both a personal safety and an information system. A user would rent a wireless or cellular telephone handset that has also an electronic camera and a navigation system. The handset will be designed so that the customer can instantly take an electronic photograph of any problem; a felony in progress, a suspicious situation, a blow-out on the car, a pet dog with a damaged leg, a tree that needs trimming, or any potential safety or security issue. The image and the geographic location will be sent to a call center that can display the photo, convert the location details into a map image and also talk to the user, all at the same time on a system that is monitored 24/7. These call centers will be Company franchises

and will be trained in dealing with any situation. In addition, the business model can easily accommodate adding telematics functions and is now being seen as having the potential to supply the profitable solution to providing telematics in vehicles by removing the need for a transmitter in the vehicle by using the user wireless handset instead and linking the vehicle telematics functions to the GPNS franchised call centers in local communities.

The proposed income would arrive from the following: Sales of franchise rights for each geographic area, royalty income from sales of base station hardware to franchisees and royalty income from franchisee sales.

The Company anticipates that it can be self capitalized once the business is set in motion. Thus, the first stage will be to set up the necessary corporate structures and business systems required to launch the business.

The Market Opportunity

We believe that there are significant benefits to be gained by the entire wireless telecoms industry addressing the core market in wireless, safety.

While everyone agrees that voice is the primary use of a mobile phone, the fact is indisputable that the base market for wireless telephones has always been shown to be safety. The majority of purchasers of mobile wireless cite personal safety as the primary reason for the original purchase of the service. Ericsson in their keynote address at the 3G World Wireless Congress in San

Francisco earlier this year showed that the base market for wireless is Safety and the FCC states: “consumers continue to cite access to emergency services as one of the most important reasons for owning a wireless phone.” (www.fcc.gov/Speeches/Tristani/Statements/stgt928.html)

Today, you can purchase a mobile phone that has a camera and a navigation system in addition to voice and it is now possible to take an electronic photograph and send that image anywhere, the person receiving the image will know where you are and can talk to you. But the question is, where do you send that photograph? Receiving the image involves displaying the image; separately showing where the user is on a map and printing out a secure copy of that image and location and of course, talking to the user. This is a very specialized call center that must be available 24/7. You will ask; surely the FCC mandated E911 service will do all this? No, it will not do so. The E911 service is only intended to show the users location. There is only one organization that leads in this particular field, it is GPNS Corporation.

The Core Market

The Company believes that their core market is the same as the one defined by E911. We are simply adding a camera to the system. It is thus considered to be as large as the existing safety market in wireless; particularly if you consider that there is the potential to replace every user handset while at the same time removing the burden of the discounted sale of the same from the carriers.

Income and Costs

Just considering the sales of franchise rights for each geographic area, the sale of rights for each of the 240 major city and metropolitan areas and for 50% of the 20,000 towns and cities listed in a

Rand McNally Road Atlas of the United States. The following are considered very conservative figures. 240 X (say) \$10m = \$2.4 billion and again, 10,000 X (say) \$100,000 = \$1 billion. - A total of \$3.4 billion.

Until the whole project is in full net profit all spending will be entirely for the addition of agreed levels of new personnel and any such facilities required supporting them. At all times, everyone's income and expenses will be in line with normal industrial averages and with no directors' incentives of any sort.

Sales and Marketing Strategy

Our sales and marketing strategy will be defined by the new team we will put together during the first phase of this operation. The primary factor will be the speed VIDEO 911 can be implemented. As we already point out, this market parallels E911 and that safety represents the major slice of the overall total wireless marketplace world wide.

The Technology

The wireless telecommunications industry is in the middle of a profound change in the use of technology. The technology most in use world wide is known as UMTS with GSM being the first stage. The initial upgrade from GSM is to GPRS. This takes advantage of the existing GSM system and upgrades it to permit always on digital transmission of any form of data. This is reliable and it gives a sufficient data rate for our purposes.

The second stage upgrade proposed to introduce data rates as high as 2 Mbs. The acronyms for this are EDGE and WCDMA. What has happened is that the second stage upgrade has some unexpected difficulties which may take some time to solve. Thus the UMTS carriers will have to make the best of their relatively cheap and reliable GSM/GPRS systems for the time being to give time for further developments in the pipeline to emerge.

The competing technology is CDMA. This is a very efficient software solution and it is being implemented by a number of carriers, both in Japan and Europe as well as by Sprint and Verizon here in the USA. In Japan, the carriers that have introduced it are now selling camera phones that take full advantage of the benefits of the CDMA system and are selling these camera phones at the rate of as many as 100,000 units per month. Such camera phones are being introduced here in the USA. The CDMA chipsets for the system are produced by a US based group, Qualcomm. It is the Qualcomm chipsets that have taken the CDMA carriers into their new markets with camera phones and it will be the fundamental idea embedded in the Qualcomm chipsets, (using software to provide the solutions), that will see the greatest technical advances. What Qualcomm does not have is the largest market. GSM/GPRS represents by far the largest market world wide.

These technologies are now threatened by what is known as Wi-Fi. We believe that the technology underpinning Wi-Fi will be utilised to solve the problems of UMTS and that a better solution will emerge. Further, there are advantages if this can be done from a viewpoint of austerity. The solutions will be very cost effective and may very well, in time, trump CDMA.

When you add a navigation system to permit location based services, again there are conflicting technologies. One uses the network to calculate the location and the other uses the Global Positioning System, (GPS) which is incorporated as a separate function within the handset to provide the location of the user. The first technique is still not delivering a complete solution and it is believed that it will ultimately be replaced by the handset based solution using GPS. Taking the design of such a GPS system and adapting it for use as an add-on to a cellular telephone has been a great challenge, but now the technology has started to arrive and the use of software, (that has no weight and takes up no space within a device), has revolutionised this technology as well. As an example, there has been a recent announcement of a GSM/GPRS/GPS/Bluetooth chip for a wireless phone. Developments such as this will change the face of the whole UMTS GSM/GPRS wireless industry.

There is a need to create a National, Geographic Information System, (GIS), which will provide accurate digital maps that cover the whole nation. We believe that GPNS Corporation will take up that challenge and become the driving force in the world for an international digital map database. However, there are available sufficient intermediate solutions on the market to suit our needs today.

Adding an electronic camera is a very easy option. There is every reason to believe that every wireless phone will have a camera as a standard feature in the future. Camera phones with GPS are being sold as we write all over the world. Receiving the transmissions is an easy option as we intend to send the images as an email and thus the software requirements are simply to take that email and drop out the necessary information so that it can be displayed and used to suit our

needs. From the viewpoint of GPNS Corporation, there is sufficient technology in place or already in the pipeline to ensure that any conceivable new product or service can be accommodated today on any carrier, anywhere in the world that has a wireless service in place. There are no technology barriers to what is being proposed in this document.

Competition

We do not have a direct competitor for a wireless telephone security service other than the requirement for E911. There are several companies providing telematics in vehicles. It is important to realise that with the motor industry being so large, there are many corporate groups already positioned and targeting the telematics industry with their own in-house developed technology. Thus we believe that the way forward will be to strike strategic alliances with any target company that will add to the synergy of the overall project. Further, we are not intending to create a competitor to existing telematics providers, rather we feel that we can provide the low cost links that are at present missing from their existing systems.

PSAP's

Public Service Answering Points, PSAP's, will find that, by being able to observe Video 911 being implemented and delivered as a commercial service, all PSAP's will be able to purchase a suitable, integrated and affordable system to suit their individual needs as they wish.

Respectfully Submitted,

Chris Coles

President and Chief Executive Officer.

GPNS Corporation <http://www.gpns.com>