Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems	)	**CC Docket No. 94-102**
	)	
Amendment of Parts 2 and 25 to Implement the Global Mobile Personal Communications by Satellite (GMPS) Memorandum of Understanding and Arrangements	)	**IB Docket No. 99-67**

COMMENTS OF THE TECHNICAL AFFAIRS COMMITTEE OF THE ASSOCIATION OF INTERNATIONAL AUTOMOBILE MANUFACTURERS, INC.

February 19, 2003

The Technical Affairs Committee of the Association of International Automobile Manufacturers, Inc. (AIAM)[1], provides the following comments related to the Commission's notice of proposed rulemaking on the scope of communications services that must provide access to basic and enhanced emergency services. AIAM will focus its comments on issues involving telematics systems in vehicles. Several of our member companies offer such systems in their vehicles for the U.S. market. Some of our supplier members produce components for use in telematics equipment.

Telematics systems offer a useful supplement to cellular telephone and government emergency service systems (PSAPs). In particular, telematics systems provide precise GPS-based location information with emergency calls nationwide, regardless of the readiness of a PSAP for Phase I or Phase II calling. Since many vehicle purchasers value these features, vehicle manufacturers wish to continue offering telematics services at reasonable cost, while maintaining the functionality of the current systems and fostering the enhancement of the technology in the future.

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[1] *AIAM Technical Affairs Committee members are American Honda Motor Co., American Suzuki Motor Corp., Hyundai Motor America, Isuzu Motors America, Inc., Kia Motors America, Saab Cars USA, and Subaru of America. Associate members include Aston Martin Lagonda of North America, Inc., Denso International America, Inc., Ferrari North America, Inc., Peugeot Motors of America, Renault, SA, and Robert Bosch Corporation.*

Telematics systems are still a relatively new and evolving technology. Given the state of development of this technology, AIAM urges the FCC to proceed cautiously in regulating these systems, so as to avoid imposing unnecessary costs on consumers or needlessly impairing the systems' functionality or future development. Telematics system developers need time to work down the cost curve to facilitate broader deployment of the technology. This effort could be undermined by the imposition of unnecessary regulatory costs and burdens. We are also concerned that adopting standards for telematics systems and equipment at this time would tend to discourage the development of new features and technological approaches. Regulation should be imposed only to the extent necessary, so as to avoid stifling innovation.

Consistent with the above-stated principles, we urge the Commission at this time to defer adopting requirements on telematics services regarding call-back or location features, mandating procedures for handling customer calls, or mandating the provision of services to non-subscribers. Mandating services or features through a regulation at this time would have the inevitable effect of "freezing" product development and reducing competition within the telematics industry. We do not believe that there is any demonstrated public need to require that all telematics systems provide precisely the same core services.

We are aware of no evidence that systems subscribers are confused regarding the scope of their services, the routing of "hot-button" calls, or similar matters. Current subscriber agreements and language in vehicle owner's manuals clearly describe the scope of the services being provided. Such descriptions make clear that the subscriber will be reaching an operator for the telematics system when the subscriber uses the system. In the absence of a clearly demonstrated consumer perception problem in this area, we see no basis for regulation.

To the extent that there have been concerns raised regarding the format and procedures for communications between telematics services and PSAPs, we urge the Commission to foster voluntary approaches to improve such communication through cooperative discussions involving the affected parties. We believe such an approach is superior to regulation.

In the area of Automatic Crash Notification (ACN), we also urge the Commission to defer taking regulatory action. This is an evolving area, with a number of government and private organizations pursuing related development programs. At this stage, cooperative, voluntary activity and discussions aimed at avoiding any potential incompatibilities among these new systems would be preferable to standardization.

We are also concerned regarding the impacts on vehicle manufacturers resulting from the switch to digital technology, if the Commission were to impose any requirements, without appropriate modifications, for telematics and any associated optional wireless interconnected services. In particular, we are concerned about the impact of such regulation on normal vehicle redesign cycles. Vehicle redesigns tend to

involve relatively long lead-time requirements (3 years or more, depending on the magnitude of the redesign) and high cost. Telematics equipment is designed to be integral to the vehicle in terms of its electrical architecture as well as its packaging. Fundamental changes to telematics equipment can necessitate corresponding changes to the vehicle as well. If such changes must be accomplished in mid-design cycle, the cost of such changes would be much higher, and the results can be less effective, than would be the case with adequate lead-time We urge the Commission to consider the lead-time needs of vehicle manufacturers in any steps it may take that would require redesign of telematics equipment. Agencies that adopt standards for motor vehicles, such as the National Highway Traffic Safety Administration and the Environmental Protection Agency, typically provide for a phase-in of significant new requirements, and we urge the Commission to consider such an approach as well.

Should the Commission decide to pursue regulation of telematics and any associated optional wireless interconnected services, it should consider how the requirements would interrelate with the automotive environment. Telematics systems are engineered for the driver, with the recognition that the driver's first priority is safe operation of the vehicle. In addition, telematics services must be truly nationwide. The systems must function seamlessly at any location the vehicle may reach. We urge the Commission to avoid taking any action that would needlessly complicate system operation or otherwise impair the function of telematics systems, given these unique challenges posed by the vehicle's mobility.

Respectfully Submitted,

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