

Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of	)	
	)	
Revision of the Commission's Rules to	)	CC Docket No. 94-102
Ensure Compatibility with Enhanced 911	)	
Emergency Calling Systems	)	
	)	
Amendment of Parts 2 and 25 to Implement	)	IB Docket No. 99-67
the Global Mobile Personal Communications	)	
by Satellite (GMPCS) Memorandum of	)	
Understanding and Arrangements; Petition	)	
of the National Telecommunications and	)	
Information Administration to Amend	)	
Part 25 of the Commission's Rules to	)	
Establish Emissions Limits for Mobile and	)	
Portable Earth Stations Operating in the	)	
1610-1660.5 MHz Band	)	

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**COMMENTS OF  
GLOBALSTAR USA, L.L.C. and GLOBALSTAR, L.P.**

Pursuant to Section 1.415 of the Commission's Rules (47 C.F.R. § 1.415), Globalstar USA, L.L.C. ("GUSA"), and Globalstar, L.P. ("GLP") (collectively "Globalstar"), submit these "Comments" on the Commission's additional proposals for emergency call services for Mobile-Satellite Service ("MSS") providers.<sup>1</sup>

GLP is the manager of the Globalstar™ 1.6/2.4 GHz MSS system. GLP owns and operates the global MSS business provided over the Globalstar non-

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<sup>1</sup> Report and Order and Second Further Notice of Proposed Rulemaking, FCC 03-290 (released Dec. 1, 2003), summarized at 69 Fed. Reg. 6595 (Feb. 11, 2004).

geostationary satellite constellation. GLP contracts for space segment capacity with service providers in individual countries who are authorized to offer voice, data and other telecommunications services to end users. In certain territories, including North America, subsidiaries of GLP offer MSS directly to consumers. GUSA is the service provider for Globalstar in the United States and Caribbean regions, and holds a blanket license for mobile earth-station terminals (“METs”) operating in the 1610-1621.35 MHz and 2483.5-2500 MHz bands.

In the Report and Order, the Commission adopted a requirement that MSS providers in the United States offer an emergency call center service for subscribers. The Globalstar system already offers subscribers in the United States an emergency call assistance service (“ECAS”). When a caller dials “911” in the United States, he or she will be connected to an operator at the ECAS center, who will assist the caller in using the satellite phone to determine the caller’s geographic coordinates. The call is then routed by the operator to the Public Safety Answering Point (“PSAP”) nearest to those coordinates. The Globalstar ECAS center handles about 12 emergency calls per month.

In the Second Further Notice of Proposed Rulemaking, the Commission seeks comment on certain additional requirements for MSS call centers. Globalstar’s responses to these questions are outlined below.

1. *Will MSS carriers with an integrated ATC system be able to comply with the location accuracy standards applicable to CMRS E911?*

The short answer to this question is “not immediately” for the satellite mode of an MSS-ATC system. While the terrestrial mode of an ATC system will use

technology similar to that of terrestrial CMRS providers, the satellite mode, for existing MSS carriers, will use the existing satellite network. As the Commission notes in the Second Further NPRM (¶ 110), at least initially, the Globalstar MSS-ATC service will consist of two modes, satellite calls over the satellite network, terrestrial calls over the terrestrial base station network. A technical solution to the hand-off from the satellite network to the terrestrial network during a call is not currently available, and will not be available, for the first-generation of the Globalstar satellite service. Therefore, the introduction of an ATC network, even with existing automatic location technology, will not improve the location technology of the satellite mode, and will not overcome the technical problems for the satellite mode of achieving the CMRS location accuracy standard in Section 20.18 of the Commission's Rules.<sup>2</sup> Globalstar described the cost and technical difficulties of meeting this standard for the satellite network in its comments filed in this docket on February 19, 2003.

Globalstar recognizes that an MSS-ATC system will thus present two distinct emergency call systems for subscribers. But, from the user's perspective, the use of two emergency call systems should not be confusing. An integrated MSS-ATC handset will provide consumers the opportunity to use one telephone whether they are in an urban center or outside the urban center in a rural or other isolated area.

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<sup>2</sup> Globalstar will integrate the spectrum management capabilities of the satellite and terrestrial modes so that spectrum resources can be handled dynamically for the entire system, and the same billing and accounting system will be used for all calls.

The terrestrial mode will only work in an urban center, unless the phone is equipped with an additional cellular/PCS component that will roam over the established terrestrial networks in rural areas. The user will always know which mode is available and in use from the screen display, and the user manual will explain the emergency call systems available in both modes.

Given the problems previously described for implementing automatic location technology for the satellite network, it would be extremely costly to attempt to implement the terrestrial location accuracy standard with the current generation of satellites and handsets. Indeed, if the Commission required an MSS carrier to implement the location accuracy standard for the satellite mode as a condition for implementing ATC, it would make implementation of ATC not feasible.

Accordingly, the Commission should require only the terrestrial mode of an MSS-ATC system to meet the location accuracy standard in Section 20.18 of the Commission's Rules.<sup>3</sup> If an individual MSS-ATC system is capable of completing in-call handoffs from the satellite to terrestrial modes, requiring the same location

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<sup>3</sup> Globalstar has envisioned certain uses of ATC that may not involve a public interconnected service on the terrestrial mode. For example, an ATC portable base station could be dropped into a wilderness area for use by personnel from a public safety organization addressing a localized natural disaster (e.g., a forest fire). With a Globalstar MSS-ATC telephone, the personnel could communicate with each other over the terrestrial network through the portable base station, and could be interconnected with the PSTN through the satellite mode. In that case, the E911 capabilities should not be required for the terrestrial mode because the terrestrial network would not offer a public interconnected service.

accuracy may be appropriate. However, meeting the location accuracy standard for the MSS network alone should be the subject of a future rulemaking.

2. *Should MSS service providers be required to submit plans for implementation of the emergency call center prior to the effective date of the call center rule?*

GUSA has already established an emergency call center that meets the requirements of the Commission's Rules. Nevertheless, GLP and GUSA do not believe that the Commission would improve the emergency MSS call center service by requiring a pre-implementation report from affected MSS providers.

Establishing a call center involves primarily hiring personnel, training personnel, and meeting the logistical issues of routing calls to PSAPs. Unlike the technical issues related to implementation of E911,<sup>4</sup> these areas are generally not the subject of the Commission's regulatory oversight. And, a carrier must move forward quickly on such issues in advance of the effective date rather than waiting for the Commission's comments on a plan for action. Moreover, these steps to establishing a call center are primarily internal procedures; a company's plans for hiring and training personnel are not typically made available to the public.

Globalstar recommends that the Commission not require a pre-implementation report. Rather, the Commission should obtain a certification of compliance with the call center requirement within 30 days after the effective date

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<sup>4</sup> Cf. 47 C.F.R. § 20.18(i) (seeking pre-implementation plans from CMRS carriers on location-determination technology and procedures for verifying compliance with Phase II accuracy standards).

of the new rule, or the commencement of commercial operations for a new MSS system.

3. *Should the Commission require collection and submission of statistics on MSS emergency calls, including volume and success rate of handing off calls to the appropriate PSAP?*

Globalstar recommends that the Commission encourage compilation of this information on a voluntary basis without any reporting requirement. Based on Globalstar's experience, the volume of 911 calls to the ECAS center is relatively small (about 12 per month). To collect meaningful data, the call center personnel would have to determine which of these calls should be classified as "emergency" calls. With respect to handing off the call to the PSAP, there is no Commission definition for "appropriate" PSAP in this context. As the Commission recognizes, the location accuracy for MSS is not as precise as that for CMRS, and the call center personnel must exercise their judgment in deciding which PSAP to call. In this context, does "appropriate" mean the closest PSAP to the caller, any PSAP in the same state, or the PSAP that can actually resolve the emergency situation by effectuating a rescue?

An MSS call center by its nature will have a different performance profile than an E911 call system that goes directly from the user to the PSAP specified for the geographic location. Moreover, the process of resolving an emergency for a person in an isolated area using an MSS phone may require more than one call by the call center and more than one PSAP, or even a non-PSAP. The Commission should depend upon MSS service providers to keep a record of incoming calls and

the results of those calls. Such records simply might not lend themselves to statistical compilations in the form that the Commission is requesting in the Second Further NPRM.

Encouraging voluntary compilations of the call center activity and results will allow MSS providers to make this information available if and when the Commission decides to review modifying the MSS emergency call requirements. At that time, the Commission should request MSS service providers to report on their experiences with emergency calls. The service providers can then present the data available to them in the way that best describes the activity and usefulness of MSS emergency call centers.

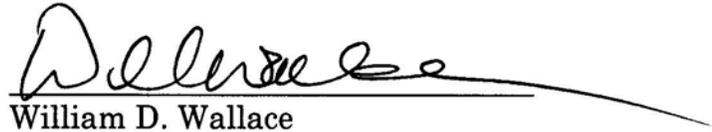
For the reasons set forth above, Globalstar recommends that the Commission (a) should apply the automatic location information requirement only to the terrestrial mode of an MSS-ATC system, (b) should require only a post-implementation report on establishment of an MSS call center, and (c) should urge voluntary compilation of information on emergency calls to MSS call centers and the results of the call center's relaying of those calls to PSAPs.

Respectfully submitted,

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March 29, 2004