



**GEOS
WORLDWIDE
LIMITED**

US Office:
550 Club Drive
Suite 470
Montgomery
Texas, 77316
USA

Tel: +1 281 271 8588
+44 2033972448
Toll free: (888) 460 4554
Fax: +1 615 827 3160

Date: 28th January 2014

Our Ref: 2414/DR

Your Ref:

**Tom Wheeler
Chairman
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554**

Re: Iridium Petition for Rulemaking (RM-11697)
Ex Parte Notice

Dear Chairman Wheeler,

As Chief Executive Officer of GEOS Worldwide, Ltd. (GEOS), I write to provide additional information in the above referenced proceeding to ensure that the Federal Communications Commission (FCC) has an accurate and complete understanding of the unmatched life-saving record of Globalstar's SPOT line of satellite-based personal tracking devices, as well as refute Iridium's claims regarding false SPOT SOS notifications. On behalf of GEOS and its employees around the world, I also request that you reject Iridium's petition in the referenced proceeding and preserve Globalstar's life-saving SPOT services.

The mission of GEOS is to provide its clients with solutions and services that truly save lives. Our service offerings are supported by our International Emergency Response Coordination Center (IERCC) located in a secure facility near Houston, TX. The IERCC is the world's first international emergency response center having supported rescues in over 130 countries and saving many thousands of lives.

Since 2008, GEOS has provided emergency response services, including dispatching and coordinating search and rescue missions, to the growing number of subscribers of Globalstar's SPOT line of personal tracking devices.

As of December 31, 2013, GEOS has responded to 3184 SPOT SOS notifications that have resulted in the rescue of well in excess of 4000 lives in 137 countries around the world and at sea. Indeed, GEOS is now averaging more than one SPOT-initiated rescue per day somewhere in the world. The vast majority of lives saved by SPOT and GEOS in foreign countries have been those of U.S. citizens traveling abroad for business and/or pleasure.



Iridium's suggestion that Globalstar's rescue numbers are somehow misleading or inaccurate is categorically wrong. The above-stated numbers do not include any false alarms and the SPOT service was instrumental in each and every one of those rescues. If anything, Globalstar has conservatively underestimated the life saving benefits of its SPOT products by focusing on the number of rescues rather than the number of actual lives saved. Frequently more than one person is saved during a rescue mission.

Interestingly enough, GEOS also provides emergency response services to the subscribers of other devices sold by Iridium and several of its partners on the Iridium Satellite Network. Indeed, GEOS is unaware of any other Satellite Emergency Notification Device (SEND) that can equal, much less surpass, SPOT's life-saving record. Relative to other competing devices, SPOT's \$150 personal alerting device is smaller, less expensive and thus appeals to a much broader market, including consumers who would not otherwise purchase a satellite-based communications device due to its perceived expense or complexity.

I would also like to address Iridium's claim that SPOT devices may be responsible for numerous false alarms that waste public safety resources. Iridium's claims are a misrepresentation of GEOS's service history and the extraordinary industry efforts to improve and standardize the requirements for SEND devices.

Initially introduced in 2007, SPOT became the de facto standard for Satellite Emergency Notification Devices (SENDs). The SEND standard was developed by the Radio Technical Commission for Maritime (RTCM) with input from GEOS's IERCC, Globalstar, other device manufacturers, satellite network providers and the National Search and Rescue Committee (NSARC). As the reference design, the SPOT device was one of the first devices to adhere to the SEND standard and has been through numerous design changes meant to minimize the occurrence of false alerts. For instance, more recent SPOT products have included recessed SOS buttons rather than raised SOS buttons to minimize the incidence of inadvertent activations.

As with any new device introduced to the marketplace, especially one that actually created an entirely new segment within the mobile satellite services industry, initial customer usage revealed areas for improvement. Subsequent design changes, as well as improvements in process and customer education have minimized the number of false alarms that were initially experienced. Today, the incidence of false SOS notifications generated by SPOT subscribers is far less than those generated by any other SENDs including PLBs and EPIRBs.

Unlike SPOT devices, the rescues networks for PLBs and EPIRBs within the U.S. are operated by U.S. government agencies and paid for by U.S. citizens.

The United States Coast Guard conducted a study of EPIRB False Alarms for devices registered in the United States concluding that 96% of all EPIRB activations were false alarms for a variety of reasons. See:

<http://www.sarsat.noaa.gov/BMW%2008%20attachments/EPIRB%20False%20Alert%20Study.2.pdf>



Similarly, it is well documented that 406 MHz Personal Locator Beacons (PLBs) have also generated false alarms usually due to lack of consumer knowledge regarding the product.

<http://www.thedenverchannel.com/news/fake-beacon-messes-with-rescuers>

http://www.denverpost.com/sports/ci_14501974

<http://www.gearinstitute.com/gear-news/best-of-the-web/item/your-plb-is-not-an-avy-beacon>

In contrast, during 2012, SPOT's average number of subscribers was approximately 222,000. That year, GEOS received 1351 SPOT SOS notifications, of which 702 were true and 649 were false. Of the 649 false SOS notifications, GEOS was able to determine that 583 of them were indeed false prior to any dispatch. This resulted in a false dispatch rate of less than 5%. The 702 true SPOT SOS notifications resulted in over 1000 actual rescues of individuals.

The Iridium filing implies that up to 48% of SPOT activations result in false dispatches that waste valuable emergency response services. This implication is patently false. Even before the design changes and increased customer education efforts, the percentage of false dispatches never exceeded 11.5% and that number has gone down with the improvements in design and education.

The comparatively low incidence of false SPOT SOS notifications resulting in a dispatch is due to the processes and procedures that have been developed by GEOS in association with Globalstar since SPOT's market introduction. Whenever a subscriber activates the SOS feature of his/her SPOT device, GEOS receives an electronic notification at our command center. Our receipt of this SOS notification commences a standard set of responsive actions that we undertake to verify that the SOS notification is legitimate before ever initiating a rescue. We review the GPS location information from which the SOS message is being sent and the recent prior messaging activity on that account. We then call the contact numbers provided on the account to verify that the SOS notification is legitimate. This may involve calling both the person listed as the subscriber on the account as well as their designated emergency contact person (usually next of kin). In most instances, through these pre-dispatch procedures, GEOS is able to verify whether the SOS notification was sent intentionally or whether it is in fact a false alarm. It is, perhaps, worth noting that GEOS defines standard operating procedures (SOPs) that are specifically tailored to each new SEND device that it undertakes to support. As a result, those devices of Iridium, DeLorme, etc. that are monitored by GEOS will all enjoy similarly low false notification dispatch rates as a result of GEOS' SOPs.

Additionally, unlike EPIRBs and PLBs, SPOT devices also have a HELP button when the subscriber is in need of assistance but is not in a life-threatening situation. This additional feature substantially reduces the number of false or inappropriate SOS notifications.

There will always be a certain number of false SOS notifications with any SENDs and a portion that will result in the dispatch of a rescue that was not actually necessary, especially given the continued growth in SPOT subscribership that we have experienced. But these



**GEOS
WORLDWIDE
LIMITED**

comparatively few instances are greatly outweighed by the life-saving benefits generated around the globe on a daily basis.

Additional information regarding GEOS, including video interviews with individuals involved in SPOT rescues as well as GEOS's recently introduced School Safety Response service, can be found on our corporate websites at www.geosalliance.com and www.schoolsafetyresponse.com.

Naturally, if you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'DRuby', with a long horizontal flourish extending to the right.

David Ruby
Chief Executive Officer
GEOS Worldwide, Ltd.