

# **DISPATCH**

## **Monthly Magazine**

This public document was retrieved from the  
U.S. International Trade Commission Web site  
and posted by

DISPATCH Monthly Magazine

National Emergency Number Association  
*The Voice of 9-1-1*



The Honorable Daniel R. Pearson, Chairman  
United States International Trade Commission  
500 E. Street, S.W.  
Washington, D.C. 20436

Re. *Certain Baseband Processor Chips and Chipsets, Transmitter and Receiver (Radio) Chips Power Control Chips, and Products Containing Same, Including Cellular Telephone Handsets*, Inv. No. 337-TA-543.

Dear Chairman Pearson:

The purpose of this letter is to express our concern about the remedy that has been proposed in the case above. Specifically, we have been informed that the remedy that the complainant requests would block the importation of CDMA chips and chipsets made by QUALCOMM that support "EV-DO" wireless broadband technology as well as the vast number of cell phones that contain these chips. While NENA offers no opinion on the merits of the underlying issues, I am concerned about the continued availability of this equipment in the United States because the organization I lead, the National Emergency Number Association ("NENA"), serves as one of the nation's largest professional associations addressing emergency communications services.

NENA is a not-for-profit professional organization dedicated to the enhancement of public safety communications. NENA is recognized by both Congress and the FCC as a leading authority on public safety telecommunications. Our members include police, fire, emergency medical response ("EMS") personnel, and other public safety professionals who operate, manage, and design 9-1-1 emergency call centers. Our members span from the first-line responders who answer and dispatch 9-1-1 calls to the people who develop, implement, and supervise these 9-1-1 services. Obviously, accurate communications is a key tool to public safety, particularly in a crisis management situation.

A key aspect of our member's work is receiving 9-1-1 calls placed from cellular telephones, physically locating the caller, and timely dispatching the appropriate first response. Cell phones that are equipped with EV-DO chipsets offer several critical features that improve wireless 9-1-1 performance and enhance the safety of the citizen using that cell phone.

As you know, when a cellular subscriber dials "9-1-1," the Federal Communications Commission requires cellular operators to provide an estimate of the physical location of the caller to the local 9-1-1 operator. Some of the biggest wireless operators in the United States use GPS technology on the cell phones to meet this requirement. Because EV-DO chipsets operate at a faster processing speed than previous technology, cell phones equipped with this technology can more accurately calculate a caller's GPS position and



deliver a much more precise location to the 9-1-1 operator (*e.g.*, up to 120 meter greater accuracy than other technologies). Such greater accuracy means, for example, being able to determine the building where the caller is located rather than just the street or block from which he is calling. Thus, in a fire, police, or EMS situation, when 9-1-1 calls are located with greater precision, NENA members can save more lives.

In addition, EV-DO technology also eliminates a phenomenon known as “voice blanking” which sometimes occurs when the transmission of location coordinates from the cell phone to the public safety answering point disrupts the voice channel between the caller and the 9-1-1 dispatcher, often by letting the caller hear nothing but silence from the 9-1-1 operator while his cell phone’s position is transmitted to the authorities. Disruption of the voice channel during emergency situations is considered unacceptable, and the membership of NENA is pleased that the adoption of EV-DO cell phones is quickly eliminating voice blanking. A ban on EV-DO technology importation by the ITC would retard resolution of the “voice blanking” problem. On behalf of NENA, its members, and the public we serve, I strongly recommend that the parties be directed to find remedies in this matter short of outright ban of critical technology, through mediation if necessary.

The public safety mission of NENA requires our members to share broadband communications between multiple public safety agencies in a mobile environment. Many of our members currently utilize EV-DO equipment to meet these requirements and plan to continue to do so. The capabilities provided by EV-DO would be difficult, time consuming and expensive (often in terms of tax dollars) for us to replicate. We hope that the ITC will not consider remedies that disrupt the availability of EV-DO equipment. From the perspective of first responders, a ban on the importation of this equipment would undoubtedly harm the public interest.

Sincerely,

A handwritten signature in cursive script that reads "Jason Barbour".

Jason Barbour, ENP  
President

CC: NENA Executive Board