

notes that small businesses are not likely to have the financial ability to become MSS system operators because of high implementation costs, including construction of satellite space stations and rocket launch, associated with satellite systems and services. Still, we request comment on the number and identity of small entities that would be significantly impacted by the proposed rule changes.

21. *Other Toll Carriers.* Neither the Commission nor the SBA has developed a specific size standard for small entities specifically applicable to "Other Toll Carriers." This category includes toll carriers that do not fall within the categories of interexchange carriers, operator service providers, prepaid calling card providers, satellite service carriers, or toll resellers. The closest applicable size standard under the SBA rules is for Wired Telecommunications Carriers. Under that standard, such a business is small if it has 1,500 or fewer employees. According to the FCC's Telephone Trends Report data, 42 carriers reported that they were engaged in the provision of "Other Toll Services." Of these 42 carriers, an estimated 37 have 1,500 or fewer employees and five have more than 1,500 employees. Consequently, the Commission estimates that a majority of "Other Toll Carriers" may be affected by the rules.

22. *Wireless Service Providers.* The SBA has developed a size standard for small businesses within the two separate categories of Cellular and Other Wireless Telecommunications or Paging. Under that standard, such a business is small if it has 1,500 or fewer employees. According to the FCC's Telephone Trends Report data, 1,761 companies reported that they were engaged in the provision of wireless service. Of these 1,761 companies, an estimated 1,175 have 1,500 or fewer employees and 586 have more than 1,500 employees. Consequently, we estimate that a majority of wireless service providers may be affected by the rules.

D. Description of Projected Reporting, Recordkeeping, and Other Compliance Requirements for Small Entities

23. The reporting, recordkeeping, or other compliance requirements ultimately adopted will depend on the rules adopted and the services subject to those rules. First, any and all of the affected entities who the Commission finds appropriate to provide 911 and E911 services (See General Criteria, for example, in paragraphs 12–15 of the Further Notice) would need to comply with the Commission's basic or

enhanced 911 rules. This would involve a schedule for implementing 911 and E911 service, and possibly regulations mandating the provision of automatic number identification (ANI), possible software modification to assist in recognition of single or multiple emergency numbers, and provision of automatic location information (ALI) and interference precautions as well as regulations specific to individual services. Additionally, paragraphs 17–27 of the Further Notice propose that all Mobile Satellite Service (MSS) licensees provide real-time, two-way, switched voice service that is interconnected with the public switched network establish national call centers to which all subscriber emergency calls are routed. Call center personnel, and would then determine the nature of the emergency and forward the call to an appropriate Public Safety Answering Point (PSAP). As noted in paragraph 14 of the Further Notice, the Commission invites comment on how the various services at issue, *i.e.* individual voice services and devices, relate to the provision of access to emergency services for persons with disabilities. (Paragraph 14 of the Further Notice.)

24. The Further Notice, in paragraphs 57–80, considers possible 911 and E911 regulation for the telematics service. Telematics can be generally defined as the integrated use of location technology and wireless communication to enhance the functionality of motor vehicles. In that regard, paragraphs 65–73 of the Further Notice analyzes the plus and minuses and prospective regulations associated with telematics systems providing access to PSAPs through an intermediary or jointly packaged mobile voice service. Paragraph 70, suggests that telematics systems give notice to consumers regarding any current limitations of telematics service in directly transmitting emergency information to a PSAP. Paragraphs 74–75 suggest a requirement that telematics providers deliver automatic crash notification data to PSAPs. This requirement raises possible issues of technical modifications and coordination between telematics providers and PSAPs.

25. The Further Notice, in paragraphs 81–91, examines whether to require multi-line telephone systems, including wireline, wireless, and Internet Protocol-based systems, to deliver call-back and location information. Possible requirements that the Further Notice suggests if the Commission decides that multi-line telephones systems should provide these services include technical standards as discussed in paragraphs 86–90 of the Further Notice. Paragraphs

92–97 of the Further Notice discuss issues that arise when consumers buy service from carriers and other service providers that resell minutes of use on facilities-based wireless carriers' networks. In that regard, the Further Notice raises the possibility of requiring the underlying facilities-based licensee to ensure that its resellers offer basic and E911 service compatible with its method of providing these services, or whether the resellers should be held accountable. Similarly, paragraphs 98–102 seek comment on whether the Commission should impose E911 requirements directly on pre-paid calling providers that are not also licensees or whether the underlying licensee should be required to ensure compliance with the E911 rules by the pre-paid calling provider.

26. Paragraphs 103–106 of the Further Notice discuss the possibility of access to emergency service by consumers who purchase disposable mobile handsets. In this case, the Further Notice notes that disposable handsets are a new product offering and as such, the Commission has little information on these devices. However, the Further Notice invites comment on whether, if disposable phone service is determined to be appropriate for offering 911 and E911 services, requiring mobile wireless service providers to ensure that the handsets used to access their networks comply with the 911 and E911 rules is sufficient or whether the Commission should place the burden for compliance on manufacturers of these handsets. If it is also determined that these handsets do not provide PSAPs with an opportunity to contact the handset user for further critical location information if necessary, some time of regulatory solution, such as a readily identifiable code to notify the PSAP that the incoming call is placed from a handset which does not offer call-back capability, could be adopted. The Further Notice also seeks comment on whether to extend 911 and E911 regulation to automated maritime telecommunications systems (paragraphs 107–110) and to emerging voice services and devices (paragraphs 111–115).

27. Other regulations and requirements are possible for those services discussed in the Further Notice found suitable for 911 and E911 service. Such rules and requirements could be found appropriate, based on comment filed in response to the Further Notice and would be designed to meet the consumer needs and licensee situations in each service and service area.