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PORTLAND MOUNTAIN RESCUE

P.O. Box 1222  
Portland, Oregon 97207



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MAY 15 1990

Domestic Facilities Division  
Satellite Radio Branch

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MAY 10 1990

Federal Communications Commission  
Office of the Secretary

May 14, 1990

Ms. Donna R. Searcy, Secretary  
Office of the Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Comments of Portland Mountain Rescue  
File No. 22-DSS-MP-90(20)

Dear Ms. Searcy,

Please find attached Comments of Portland Mountain Rescue concerning  
Orbital Communication Corporation's (ORBCOMM) Application for authority to  
construct a mobile data service using low-earth orbit satellites.

As requested, five copies of the comments are enclosed.

Sincerely,

J. C. Scheetz  
Member, Board of Directors  
Portland Mountain Rescue

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MAY 10 1990

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

Federal Communications Commission  
Office of the Secretary

In the Matter of the

Application of Orbital Communication Corporation for Authority to Construct  
a Low-Earth Orbit Mobile Satellite System (File No. 22-DSS-MP-90(20))

COMMENTS

Portland Mountain Rescue (PMR) is the recognized search and rescue (SAR) organization for hazardous terrain in the Mt. Hood area. Much of our specialized technical SAR activity is conducted in the alpine environment above timberline, but we also support lowland searches in the rugged foothills surrounding Mt. Hood. The primary purpose of our organization is to provide volunteer SAR services when requested by proper authorities. Secondary purposes include unit training, public education, and advising responsible government agencies on SAR related subjects.

Our unit consists of about 100 volunteers who must maintain qualifications through scheduled training. Our rescue activities have seasonal variations, but average about one mission per month. Virtually all of our searches involve remote, rural or backcountry areas. Backcountry users who benefit from our services include climbers, hikers, skiers, hunters, and fishermen.

Wilderness emergencies often involve physical injury which mandates an urgent and timely response by rescuers. Thus the SAR emergency services (SecurNet) proposed by ORBCOMM has great appeal. Search times could be drastically reduced if accurate position information is known. If a prudent backcountry user were to carry a SecurNet Emergency Terminal, he would be able to summon assistance and announce his location almost immediately. The time-consuming search function could be virtually eliminated.

Navigation in trailless, heavily vegetated areas is often a major concern of the searchers. We are currently experimenting with portable LORAN C receivers but expect performance to be highly dependent on the terrain. It is likely that a satellite platform would mitigate the terrain dependence and allow more reliable radio-navigation.

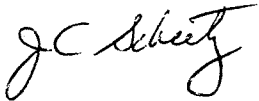
Our current communication equipment consists of fixed channel VHF radios operating on the public service frequencies (155 Mhz FM). In steep terrain it is not uncommon to lose the line-of-sight geometry needed for VHF thereby creating radio "dead" zones. It is expected that an overhead satellite performing as a relay would reduce the occurrence and size of such zones. Thus a portable message terminal, as proposed by ORBCOMM, could supplement existing VHF voice radio and would enhance tactical communication availability.

One of the big questions which emerged from our review of the Commission's request for comments on the establishment of PELTS was the source of funding. ORBCOMM's proposal addresses the issue by user (subscriber) fees. Based on their market analysis of their SecurNet emergency service, automotive installations alone will provide economic support for the service. Thus backcountry users will have the opportunity to use the service which will primarily be supported by other users. This will keep down the costs to the backcountry user and is viewed as highly desirable.

PMR is also a primary user of the Mt. Hood Locator Unit, a low power beacon device authorized under Part 15. The development of this system increased our awareness of product liability concerns. Legislative liability protection was needed and obtained for this system. We believe that the emergency service portion of ORBCOMM's proposed system will also need similar protection and urge the Commission to give this serious consideration.

For the reasons given above, PMR supports ORBCOMM's Application to construct the proposed system and urges the Commission to act expeditiously in the licensing process. By authorizing construction immediately after the prerequisite rulemaking, unnecessary time delays are avoided.

Respectfully submitted,



Portland Mountain Rescue  
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