

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Public Safety and Homeland Security)	PS Docket No. 17-344
Bureau Seeks Comment on Response Efforts)	
Undertaken During 2017 Hurricane Season)	
)	
)	

COMMENTS OF LIGADO NETWORKS SUBSIDIARY LLC

Ligado Networks Subsidiary LLC (“Ligado”) commends the Commission for its inquiry into the resiliency of communications networks and government and industry responses during the 2017 hurricane season. With its two decades of satellite operations, Ligado has a long history of serving the women and men who provide critical support during disasters, including FEMA, the Coast Guard and many state and local public safety agencies. Currently, about 700 public organizations regularly use Ligado’s network, including many public safety and first responder organizations.

Ligado’s one-of-a-kind satellite network provides coverage throughout North America using state-of-the-art capabilities that offer pervasive connectivity to small fixed and mobile devices. The company’s satellite also features cutting-edge beamforming technology that provide additional bandwidth to areas or regions that desperately need it – which is often the case when disasters hit.

Disaster response needs reliable networks, and the unique reliability of satellite service stands out during times of disaster. Satellite service is available even when cell towers and landlines are congested or damaged, and can be accessed from remote areas not served by terrestrial communications networks. The mobility of Ligado’s satellite terminals ensures that

public safety officials can communicate even if emergency operations centers need to be evacuated.

Ligado currently provides two services to the public safety community: telephony and push-to-talk (PTT) radio service. Ligado's telephony service has many of the same features as landline or wireless calling, allowing callers to talk at the same time, and including voicemail, call waiting, call forwarding, call blocking, and conference calling. While numerous public safety parties use Ligado's telephony service, the most popular option for emergency communications is the company's two-way, PTT radio service over satellite. The PTT dispatch or two-way radio style is familiar to the public safety community and ideal for command and control. Individuals can efficiently broadcast messages to an entire talk group or talk one-to-one via a "private mode" talk group.

One of the ways Ligado serves the public safety community in preparing and responding to disasters is through its Satellite Mutual Aid Radio Talkgroup (SMART) program. SMART is a nationwide and regional program of public safety talk groups that operates on the Ligado satellite network. These talk groups enable critical and interoperable communications among homeland security officials, law enforcement, emergency responders, and public safety officials from various departments and agencies across the United States. By using Ligado's unique push-to-talk satellite technology, each authorized member of a SMART talk group can participate in the conversation. The SMART program allows customization of talk groups to enable specific interoperability at the national and regional levels, as well as between federal agencies.

Prior to and during the recent hurricane season, numerous mainland U.S. public safety agencies prepared for possible interruptions in terrestrial radio service by requesting that

Ligado's SMART talk groups be downloaded to their devices. This included the Texas Department of Public Safety, which is one of the company's largest public safety customers. In addition, prior to the first major storm of the 2017 season, Ligado responded to requests from mainland US agencies to update radio configurations and resume service on unused devices.

Once the hurricane season began, Ligado responded by placing hundreds of new satellite phone units in the hands of federal and state officials. In the immediate aftermath of Hurricane Maria, for example, Ligado quickly responded to a request for satellite telephones from the Puerto Rican government by contacting MISSION UNITED, a United Way of Broward County program that assists veterans in transition from military service. MISSION UNITED was already sending volunteers and supplies to Puerto Rico through a partnership with federal first responders that included the US Army and the Department of Homeland Security. Working with MISSION UNITED, Ligado arranged for the delivery of satellite telephone units to Puerto Rico for distribution to relief workers, community centers and church groups serving as recovery hubs.

Donated satellite phones and service continue to be used by public safety officials, volunteers, and community organizations in Puerto Rico so they can stay in touch with areas where the communications infrastructure has been destroyed. Attachment A contains images showing the significant uptick in Ligado's Mobile Satellite (MSAT) usage before and after Hurricane Maria. Throughout the 2017 hurricane season, Ligado's satellite network had nearly 100 percent availability, not only in Puerto Rico, but in all the affected areas.

Ligado continues to enhance its disaster response procedures. Following the 2017 hurricane season, the company began maintaining a set of "Rapid Response" satellite phones that are ready for immediate use and can be deployed quickly in response to future disasters. This

new resource allowed Ligado to quickly deploy satellite phones to new customers in response to the recent California wildfires.

Ligado has a long track record of service to the public safety community. The reliability and capability of its network allow the company to provide quick service when other communications capabilities are unavailable. Ligado's recent efforts in support of the rescue and recovery efforts associated with the 2017 hurricane season demonstrate that commitment, and the company remains prepared to provide additional service whenever and wherever needed.

Respectfully submitted,

/s/ Valerie Green

Valerie Green

William Davenport

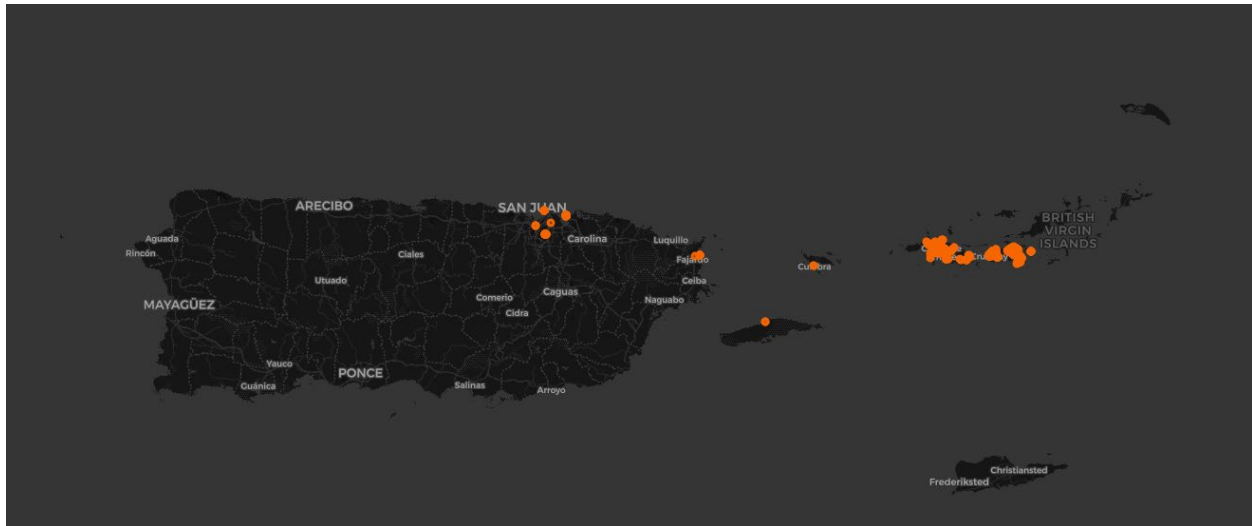
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ATTACHMENT A

The following satellite images depict usage of Ligado MSAT telephones. Each dot represents a unit making or receiving a call or PTT conversation.

Week of Sept. 8-15, 2017:



Week of Oct. 6-13, 2017:

