



March 23, 2018

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

**Re: Written *Ex Parte* Presentation – IB Docket No. 98-96 – 1998  
Biennial Regulatory Review – Review of Accounts of Settlement in  
the Maritime Mobile and Maritime-Satellite Radio Services and  
Withdrawal of the Commission as an Accounting Authority in the  
Maritime Mobile and Maritime-Satellite Radio Services**

Dear Ms. Dortch:

Inmarsat submits this *ex parte* letter to supplement its previously-filed Comments in the above-captioned proceeding.<sup>1</sup> As stated in Inmarsat's Comments, the company supports the Federal Communications Commission's proposal to exit the accounting authority business.<sup>2</sup> The record in this proceeding reflects that Inmarsat and the other private accounting authorities authorized by the Commission stand ready to take on the settlement of additional accounts necessitated by this Commission decision. Moreover, regardless of how the Commission chooses to proceed, Inmarsat will continue to offer Global Maritime Distress and Safety System ("GMDSS") distress calling for free to all vessels, ensuring that this critical safety-of-life service has uninterrupted availability.

Inmarsat continues to maintain that the most critical element to an effective transition away from the accounting authority function will be a robust Commission outreach campaign to notify its users of their need to register with a new accounting authority, as the Commission stated its intention and ability to do in the *Second Further Notice*.<sup>3</sup> Consistent with the concerns raised by some parties in this proceeding, it is important that the Commission achieve a smooth transition away from its responsibilities as accounting authority of last resort, and Inmarsat is committed to collaborating with the Commission to achieve this goal, within the company's contractual and legal confines.

---

<sup>1</sup> Comments of Inmarsat Inc., IB Docket No. 98-96 (filed Mar. 14, 2017).

<sup>2</sup> *Id.* at 1.

<sup>3</sup> 1998 Biennial Regulatory Review -- Review of Accounts Settlement in the Maritime Mobile and Maritime Mobile-Satellite Radio Services and Withdrawal of the Commission as an Accounting Authority in the Maritime Mobile and Maritime Mobile-Satellite Radio Services, *Second Further Notice of Proposed Rulemaking*, 31 FCC Rcd 13785 at ¶¶ 9, 17-18 (2016) (*Second Further Notice*).

Inmarsat understands that the Commission is in the process of developing a plan to ensure that users of potentially affected terminals are contacted and informed about the accounting authority transition. To assist the Commission in verifying its own records, and subject to appropriate protections for personal, confidential, and proprietary information, Inmarsat agrees to provide the Commission with the Inmarsat Mobile Number (IMN) for each Inmarsat-C terminal registered in Inmarsat's database to the US01 accounting authority.

Inmarsat also proposes to contact all vessels via Enhanced Group Call to notify them of the need to transition away from the US01 accounting authority. Inmarsat will collaborate with the Commission on the content of these messages, consistent with the principles that the messages be safety-related and non-commercial.

Inmarsat looks forward to continuing to work with the Commission throughout the course of this transition in order to achieve the shared goal of preserving an effective, efficient, and safe maritime mobile satellite communications service.

Respectfully submitted,

/s/ M. Ethan Lucarelli

M. Ethan Lucarelli  
Director, Regulatory & Public Policy  
Inmarsat  
1101 Connecticut Ave., NW  
Suite 1200  
Washington, DC 20036