



Federal Communications Commission  
Washington, D.C. 20554

January 24, 2018

Ethan Lucarelli  
Director, Regulatory and Public Policy  
Inmarsat  
Via electronic mail: [Ethan.Lucarelli@inmarsat.com](mailto:Ethan.Lucarelli@inmarsat.com)

Dear Mr. Lucarelli:

As you may be aware, the Federal Communications Commission has issued a Further Notice of Proposed Rulemaking in which it has proposed to transition the functions and duties it currently performs as a maritime accounting authority to private accounting authorities. In doing so, the FCC revisits its findings from a 1999 Report and Order and Further Notice of Proposed Rulemaking, which included the Commission's decision that it should withdraw as an accounting authority in the maritime mobile and maritime mobile-satellite radio services.

In researching the potential impact of the FCC's proposal, it appears that the primary impact may be to users of Inmarsat C-Sat terminals that have US01 (FCC) as their default or assigned accounting authority. These satellite terminals are used for International Maritime Organization's mandated GMDSS, Long Range Identification and Tracking (LRIT) and ship security alerting system (SSAS used as a piracy alert). Consequently, this matter involves safety of life and safety of vessels. Once the FCC ceases operating as an accounting authority, affected satellite terminals likely will be prevented from making calls, LRIT and SSAS included, other than GMDSS distress alerting, which will be allowed. As part of any transition plan, it will be important to contact these users to ensure that they are aware of the requirement that they make alternative arrangements for accounting authority.

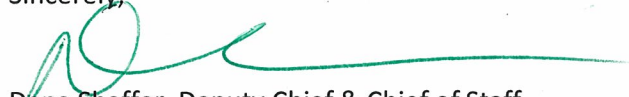
Given that there is no practical way for the FCC to identify 100% of the C-SAT terminals that will be impacted by the agency's proposed withdrawal except by asking Inmarsat (since some of these terminals have the FCC as their designated accounting authority "by default"), and in light of the public safety issues associated with this proposed regulatory action, by this letter we are asking Inmarsat to provide the FCC with a listing of all Inmarsat C-SAT terminals commissioned with the FCC as accounting authority of last resort. Please include in the list of relevant terminals information sufficient to ensure

contact of each terminal's owner and operator, including the following information: current contact information including company name and point of contact name, mailing address, affected SATPHONE identity, contact phone number and contact email address.

It is requested that Inmarsat provide this information to the FCC in Excel Spreadsheet format, no later than 30 days from the date of this letter. Please return this information directly to me at Dana.Shaffer@fcc.gov.

Thank you for your assistance. If you have any questions, please do not hesitate to contact me

Sincerely,



Dana Shaffer, Deputy Chief & Chief of Staff  
Wireless Telecommunications Bureau  
Federal Communications Commission