

July 17, 2017

Ex Parte

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

Re: 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 (“2016 Accounting Authority Second FNPRM”)

Dear Ms. Dortch:

On July 14, 2017, David Greenhill (President – COMSAT), Sandy Clatworthy (CFO – COMSAT); Mark Whitson (General Counsel – Satcom family of companies); Allison Rule (Partner – Marashlian & Donahue, PLLC), and Michael Donahue (Partner – Marashlian & Donahue, PLLC), representing COMSAT, INC. (“COMSAT”), met with Rachael Bender, Esq., Legal Advisor to Chairman Ajit Pai, with respect to COMSAT’s Reply Comments in the above-numbered proceeding.

During the meeting, COMSAT confirmed its agreement with the decision of the Federal Communications Commission (“FCC” or “the Commission”) to withdraw as accounting authority of last resort. Doing so makes sense for the Commission and for taxpayers. In addition, COMSAT reiterated its position that maintaining a default accounting authority in the Commission’s absence is essential for safety, as well as logistical issues, and that the role is best served by COMSAT.

In support of its position, COMSAT noted that, by virtue of the *Commission’s 2016 Accounting Authority Second FNPRM*, all interested parties have had ample opportunity to provide input as to the appropriateness of the Commission designating a new default accounting authority. Only three entities submitted comments in this proceeding. Notably, COMSAT was the only entity that publicly volunteered to take on the important role of default accounting authority. Further, COMSAT’s history in the industry and its position as a service agnostic provider make the Company the logical choice for replacing the Commission as the default authority. Lastly, COMSAT is dedicated to protecting the safety of its customers, which is likewise achieved by assigning the role of default authority to COMSAT.

COMSAT also agrees with the questions raised by the Commission and the participants in this proceeding regarding effecting a smooth transition away from the FCC serving as the accounting authority of last resort. Assignment of the default authority to COMSAT would greatly reduce the

time and expense associated with the transition and would allow the Commission to efficiently exit a role it no longer wishes to serve without risking disruptions in service.

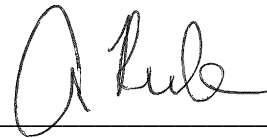
In sum, appointing COMSAT as the default accounting authority is in the best interest of the Commission, taxpayers, and the industry and presents a commonsense and cost-effective approach to close this long-pending proceeding.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this letter is being electronically submitted into the record of these proceedings and provided to the Commission participants. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

COMSAT, INC,

By:



Allison D. Rule
Michael P. Donahue
Marashlian & Donahue, PLLC
1420 Spring Hill Road, Suite 401
Tysons, VA 22102
Tele: (703) 714-1312
Fax: (703) 563-6222
E-Mail: adr@commlawgroup.com

Its Counsel

cc: Rachael Bender, Esq.