



UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and
Information Administration
Washington, D.C. 20230

August 24, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: 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 the Maritime Mobile-Satellite Radio Services Except for Distress and Safety Communication – IB Docket No. 98-96

Dear Ms. Salas:

Enclosed please find an original and four copies of the Comments of the National Telecommunications and Information Administration in the above-referenced proceeding. As required, a copy of this document and an electronic version on disk has been provided to the International Transcription Service. An electronic version on disk has also been provided to John Copes of the International Bureau.

Please direct any questions you may have regarding this filing to the undersigned. Thank you for your cooperation.

Respectfully submitted,

Kathy Smith
Acting Chief Counsel

Enclosures

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

1998 Biennial Regulatory Review –)	IB Docket No. 98-96
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 the Maritime Mobile-Satellite)	
Radio Services Except for Distress)	
and Safety Communications)	

**COMMENTS OF THE NATIONAL TELECOMMUNICATIONS
AND INFORMATION ADMINISTRATION**

The National Telecommunications and Information Administration (NTIA) within the Department of Commerce serves as the President's principal advisor on telecommunications and information policy, and through its Office of Spectrum Management, is responsible for managing the Federal Government's use of the radio spectrum. On behalf of the Federal agencies represented on the Interdepartment Radio Advisory Committee that use maritime mobile and maritime mobile-satellite radio services, NTIA respectfully submits the following Comments in response to the Commission's Notice of Proposed Rulemaking (NPRM) in the above-captioned proceeding.

The Commission proposes to withdraw as a nationwide clearinghouse for settling accounts for radio stations operating in the maritime mobile and maritime-mobile satellite services aboard ships and other vessels at sea and in aircraft and ashore. Instead, it proposes to rely upon private accounting authorities, certified under Part 3 of the Commission's Rules and operating

under the regulatory oversight of Commission staff, to perform these functions. The Commission specifically requests "government agencies to comment on this proposal and whether they have any special needs that would require us to continue to serve as a clearinghouse for government agencies." *See* NPRM at ¶ 14.

Federal agencies rely upon the Commission accounting authority services for use of INMARSAT ship, aircraft and land earth-stations used for the Global Maritime Distress and Safety System as well as for command and control communications. If the Commission were to terminate its accounting authority services for the Federal Government, each agency using the Commission as an accounting authority would incur an unfunded liability. Additionally, Federal agencies would not legally be able to pay such charges under the Federal Acquisition Regulations and Defense Acquisition Regulations until contracts could be prepared, competed and awarded. Since most Federal Government agencies work on a three-year budget cycle, they require at least three years to identify the funds required, obtain funding, and compete and award contracts to successful bidders.

NTIA is also concerned that the transition to new accounting authorities might result in disruptions or curtailment of communication services to federal users. A number of these are critical, mission-related communication services, albeit not always used for distress and safety purposes. Moreover, a change to private accounting authorities could result in increased cost to the taxpayer. For these reason, we request that the Commission retain its accounting authority services to the Federal government. If the Commission decides, however, to terminate accounting authority services with Federal agencies, we request that it defer such termination until an alternative billing and payment arrangements ensuring uninterrupted service can be established.

For the foregoing reasons, NTIA respectfully submits these comments.

Respectfully submitted,


Kathy D. Smith
Acting Chief Counsel

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Communications and Information

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