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November 5, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: ***SatCom Global, Inc.***
Request for Waiver of Section 64.2009(e) of the Commission's Rules
EB Docket No. 06-36

Dear Ms. Dortch:

SatCom Global, Inc. ("SatCom"), by counsel and pursuant to Section 1.3 of the Commission's Rules, hereby requests a waiver of Section 64.2009(e) of the Commission's Rules to permit the late filing of the attached Annual Customer Proprietary Network Information ("CPNI") Report for calendar year 2013.

SatCom is a reseller of satellite telecommunications services. On October 26, 2012, One Horizon Group plc ("OHG") and Broadband Satellite Services Limited ("BSS") entered into a Share Purchase Agreement in which all of the shares of Satcom Distribution, Inc. ("SDI"), a wholly-owned subsidiary of OHG, were to be sold by it to BSS. SDI owns 100% of each of SatCom and Horizon Mobile Communications, Inc. ("HMC"). On February 20, 2014, the Commission consented to the transfer of control of SatCom and HMC to BSS (FCC File Nos. ITC-T/C-20130612-00172 and ITC-T/C-20130612-00171). On March 20, 2014, consummation notices reflecting the two transfers of control were filed with the Commission.

During calendar year 2013 while the transfer applications were pending, OHG maintained control over SatCom, and was legally responsible for compliance with Commission rules and requirements. The qualifications of BSS, as the proposed but unapproved transferee, had not been approved by the Commission and BSS therefore was not able to legally exercise control over SatCom.

BSS recently asked its counsel to undertake a review of SatCom's compliance with Commission rules. In the course of this review, it was determined that SatCom had not filed the annual CPNI certification for calendar year 2013. BSS believes that the pending status of the transfer application coupled with the uncertain employment status of responsible management of OHG-controlled SatCom may have created some confusion over which party would bear responsibility for authorizing and filing the certifications. Under OHG's control, SatCom had timely filed annual CPNI certifications in previous years.



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SatCom respectfully submits that there is good cause for grant of a waiver of the March 1, 2014 deadline for filing its attached CPNI certification. First, the CPNI certification indicates that SatCom is in full compliance with the CPNI rules and that during calendar year 2013, SatCom took no action against data brokers and received no customer complaints concerning the unauthorized release of CPNI. Accordingly, the substance of the certification should not present concerns for Commission staff. Second, it is important to note that during calendar year 2013 and for the first few months of 2014, BSS was not in a position of control over SatCom and thus could not legally authorize and effectuate the filing of the certification. Third, BSS, as the new owner of SatCom, has exercised diligence in requesting an FCC compliance review, and has authorized the late-filing of the certification once it was determined that the certification for calendar year 2013 had not been timely filed. Fourth, SatCom submits that neither any entity nor the public interest will be harmed by grant of the requested waiver.

Under its new controlling party BSS, SatCom sincerely regrets the late-filing of the CPNI certification for calendar year 2013, and will ensure future compliance with Section 64.2009(e) and other Commission rules.

Please direct any questions to undersigned counsel to SatCom.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Stephen E. Coran', with a long horizontal flourish extending to the right.

Stephen E. Coran

Attachment: CPNI Certification

ANNUAL § 64.2009(e) CPNI CERTIFICATION FOR 2013

1. Date filed: ~~November 5, 2014~~
2. Name of company(s): SatCom Global, Inc.
3. Form 499 Filer ID: 823974
4. Name of signatory: Adam Thompson
5. Title of signatory: President
6. Certification:

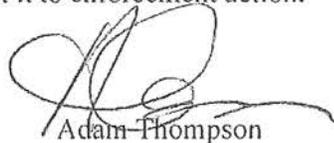
I, Adam Thompson, certify that I am an officer of SatCom Global, Inc. ("SatCom"), and acting as an agent of SatCom, that I have personal knowledge that SatCom has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification is a statement explaining how SatCom's procedures ensure that SatCom is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.

SatCom has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

SatCom has not received customer complaints in the past year concerning the unauthorized release of CPNI.

SatCom represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. SatCom also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



Adam Thompson
President
SatCom Global, Inc.

Date: 10/30/14

STATEMENT OF CPNI COMPLIANCE PROCEDURES

SatCom Global, Inc. (“SatCom”) has established and implemented the following internal policies and procedures to ensure compliance with the requirements of Section 222 of the Communications Act of 1934, as amended, and with Federal Communications Commission rules governing Customer Proprietary Network Information (“CPNI”), codified at 47 C.F.R. § 64.2001 *et seq.*

The following operating procedures are intended to ensure that SatCom complies with the CPNI Rules:

1. SatCom does not make available to any affiliated or unaffiliated entity information which meets the definition of CPNI set forth at 47 U.S.C. § 222(h)(1), except when required to do so by the law.
2. SatCom only uses CPNI to render, and bill for, the telecommunications services it provides to its customers. SatCom does not use its customers’ CPNI for any marketing purpose, either internal or external, or any other purpose set forth in the CPNI Rules.
3. SatCom has established the following practices and procedures governing the disclosure of CPNI:
 - (a) SatCom does not disclose or release CPNI upon a customer’s telephone request except under the following circumstances: (1) SatCom verifies the identity of the caller by return call to the telephone number of record in the customer’s file; (2) SatCom sends the CPNI to the customer’s address of record in the customer’s file; or (3) for business customers, through the customer’s dedicated account manager.
 - (b) SatCom automatically notifies customers (at the customer’s original telephone number or address on file) in case any changes are made to the customer’s primary account information.
 - (c) SatCom has implemented procedures to notify the required U.S. government agencies in the vent of a breach of the CPNI rules and to provide the required notice to affected customers of any such breach.
4. SatCom provides comprehensive training on these practices and procedures to all relevant employees. SatCom has established a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations. SatCom maintains records of carrier compliance for a minimum of one year.
5. Because SatCom does not use CPNI for any purpose and does not provide CPNI to other entities (except when compelled under the law to do so, or as requested to so by customers), it has not implemented either “opt-in” or “opt-out” CPNI

approval procedures, *see* 47 C.F.R. § 64.2007, and it has not implemented the CPNI notification procedures, *see* C.F.R. § 64.2008.

6. In the event that SatCom in the future plans to utilize CPNI to provide CPNI to other entities other than as described above, it will first provide customers notification of their CPNI rights as required by 47 C.F.R. § 64.2008.
7. It is a violation of SatCom policies to disclose CPNI outside of SatCom. Any employee found to have violated this policy will be subject to disciplinary action up to and including termination.
8. Access to CPNI at SatCom is restricted to a limited number of employees and controlled through the use of active security and other measures, including the use of special passwords that are assigned on a limited basis and technological measures which prohibit the electronic reproduction or distribution of CPNI. Encryption and other security practices are utilized when CPNI is transmitted electronically.
9. Controls are in place involving responses to law enforcement agencies that serve SatCom with valid legal demands, such as a court ordered subpoena, for CPNI. SatCom will not supply CPNI to any law enforcement agency that does not produce a valid legal demand.