

WC 14-239



Received & Inspected

OCT 24 2014

October 23, 2014

FCC Mail Room
RECEIVED

NOV 14 2014

FCC-Competition Policy Division

Via Overnight Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: In the Matter of Section 63.71 Application of RigNet Satcom, Inc. For Authority Pursuant to Section 214 of the Communications Act of 1934, as Amended To Discontinue the Provision of Service

Dear Ms. Dortch:

On behalf of RigNet Satcom, Inc., a/k/a RigNet, Inc. ("RigNet"), enclosed and original and six (6) copies of an application for permission to discontinue the provision of service, pursuant to Section 214 of the Communications Act of 1934, as amended ("Act") and associated rules of the Commission contained in Part 63, Title 47, Code of Federal Regulations.

RigNet respectfully submits the filing a combined domestic Section 214 application and international Section 214 application ("Combined Application"). RigNet is also submitting the Combined Application with the International Bureau through the MyIBFS portal.

Please date-stamp the enclosed extra copy of this filing and return it in the envelope provided. Please direct any questions with respect to this filing to the undersigned.

Sincerely,

Robert H. Jackson
Counsel for RigNet Satcom, Inc.

DOCKET FILE COPY ORIGINAL

MARASHLIAN & DONAHUE, LLC

TELEPHONE: (703) 714-1300

FACSIMILE: (703) 714-1330

EMAIL: MAIL@COMLAWGROUP.COM

WEB: WWW.COMLAWGROUP.COM

THE COMMLAW GROUP

1420 SPRING HILL ROAD

SUITE 401

MCLEAN, VIRGINIA 22102

Received & Inspected

OCT 24 2014

FCC Mail Room

RECEIVED

NOV 14 2014

FCC-Competition Policy Division

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

In the Matter of)
)
Section 63.71 Application of RigNet Satcom, Inc.)
)
For Authority Pursuant to Section 214 of)
The Communications Act of 1934, as Amended)
To Discontinue the Provision of Service)

Section 63.71 Application of RigNet Satcom, Inc.

RigNet Satcom, Inc.. a/k/a RigNet, Inc., ("RigNet"), applies for authority pursuant to Section 214 of the Communications Act of 1934, as amended ("Act"), 47 U.S.C. § 214, and Section 63.71 of the rules of the Federal Communications Commission ("FCC" or "Commission"), 47 C.F.R. § 63.71, to discontinue all domestic common carrier services in its service territory located in Louisiana, Texas and the Gulf of Mexico.

As required by Section 63.71(a) and (b) of the Commission's rules, RigNet provides the following information:

Name and Address of Carrier (47 C.F.R. § 63.71(a)(1), (b)(2)):

RigNet, Inc.
1880 S. Dairy Ashford, Suite 300
Houston, TX 77077

Date of Planned Discontinuance (47 C.F.R. § 63.71(a)(2), (b)(2)):

RigNet plans to discontinue service on or after January 1, 2015, subject to FCC approval of this application.

Points of Geographic Areas of Service Affected (47 C.F.R. § 63.71(a)(3), (b)(2)):

All common carrier services will be discontinued in Louisiana, Texas and the Gulf of Mexico.

Brief Description of Type of Service Affected (47 C.F.R. § 63.71(a)(3), (b)(2)):

RigNet is a provider of specialized communications services, generally through the use of satellite facilities, to the oil and gas industry in the Gulf of Mexico and to various related on-shore locations, including some in Louisiana and Texas. Recently, RigNet purchased telecommunications assets from Stratos Offshore Service Company ("Stratos").¹

RigNet does not offer, and has no customers for, common carrier services, but provides a variety of services on a private carrier basis. RigNet plans to serve selected customers on this basis for the indefinite future.

Brief Description of the Dates and Methods of Notice to all Affected Customers (47

C.F.R. § 63.71(b)(3)):

RigNet has no customers for common carrier services; hence, no customer notice has been prepared or sent.

Copies of this application are being sent, first class mail, to the public utilities commissions and governors of Louisiana and Texas and also to the Special Assistant for Telecommunications to the Secretary of Defense, as required by Section 63.71(a) of the Commission's rules.

Regulatory Classification of Carrier (47 C.F.R. § 63.71(b)(3)):

To the extent RigNet were to provide common carrier services, it would do so as a non-dominant carrier. RigNet provides all of its services on a private carrier basis.

Contact Information:

Questions about this application may be addressed to Robert H. Jackson, Marshlian & Donahue LLC, 1420 Spring Hill Road, Suite 401, McLean, VA 22102, 703-714-1300.

¹ RigNet did not, however, acquire ownership of Stratos or any of its affiliates. Stratos provided common carrier communications services, as a Competitive Local Exchange Carrier ("CLEC"), to the oil and gas industry in the Gulf of Mexico and to various on-shore locations, including some in Louisiana. Based on information received from Stratos, RigNet understands Stratos no longer offers those services and has no remaining customers for common carrier services. Stratos' domestic Section 214 authority was transferred to RigNet in WC Docket No. 13-224 (rel. Jan. 28, 2014).

Conclusion:

The public convenience and necessity will not be adversely affected by the discontinuance of RigNet's common carrier services because equivalent services are and will continue to be available from RigNet. RigNet respectfully requests that the FCC approve this Section 63.71 application to discontinue common carrier services.

Respectfully submitted,

RigNet Satcom, Inc.

By: 

Robert H. Jackson
Marashlian & Donahue, LLC
1420 Spring Hill Road, Suite 401
McLean, VA 22102
Tel: 703-714-1300
Fax: 703-714-1330
rhj@commlawgroup.com

Its Attorney

Dated: October 23, 2014

CERTIFICATE OF SERVICE

I, Robert Jackson, hereby certify that on this 23rd day of October, 2014 a true copy of the Section 63.71 Application of RigNet Satcom, Inc. a/k/a RigNet, Inc.'s ("RigNet"), for Authority Pursuant to Section 214 of the Communications Act of 1934, as Amended to Discontinue the Provision of Service, was filed via Federal Express and was served upon the following via First Class Mail:

VIA FIRST CLASS MAIL

James Ball, Chief
Policy Division
International Bureau
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Louisiana Public Service Commission
Galvez Building, 12th Floor
602 North Fifth Street
Post Office Box 91154
Baton Rouge, Louisiana 70821-9154

Office of the Governor: Bobby Jindal
PO Box 94004
Baton Rouge, LA 70804-9004

Public Utilities Commission of Texas
1701 N. Congress Avenue
PO Box 13326
Austin, TX 78711-3326

Office of the Governor of Texas: Rick Perry
Office of the Governor
P.O. Box 12428
Austin, Texas 78711-2428

Secretary of Defense
Attn. Special Assistant for Telecommunications
1000 Defense Pentagon
Washington, DC 20301.



Robert H. Jackson
rhj@commlawgroup.com
Marashlian & Donahue, LLC
1420 Spring Hill Road
Suite 401
McLean, VA 22102
703-714-1300
703-714-1330 (facsimile)