

December 9, 2014

Ex Parte

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

Re: *Telephone Number Portability, et al.*, CC Docket No. 95-116, WC Docket Nos. 07-149 & 09-109

Dear Ms. Dortch:

In this proceeding, Neustar has argued that Telcordia Technologies, Inc.'s proposed subcontractor Sungard is affiliated with a telecommunications service provider, RigNet, Inc. a/k/a RigNet Satcom Inc. ("RigNet").¹ Although Telcordia demonstrated that Neustar's neutrality analysis was incorrect,² the issue is now moot. To the extent that RigNet was registered with individual states, that is no longer the case.³ On October 24, 2014, RigNet filed an application with this Commission to discontinue all domestic common carrier services as of January 1, 2015, although it also stated that it was only providing services on a private carrier basis.⁴ As of Monday, November 24, 2014, that application was automatically deemed granted.⁵ RigNet also states that although it purchased telecommunications assets from Stratos Offshore Oil Company, which had provided services as a CLEC, RigNet did not acquire Stratos, and Stratos has no remaining customers for common carrier services.⁶ Thus, although RigNet is not now providing telecommunications services, it is indisputable that as of January 1, 2015, RigNet

¹ See Reply Comments of Neustar, Inc. at 21-22, WC Docket No. 09-109 & CC Docket No. 95-116 (filed Aug. 22, 2014); Letter from Aaron M. Panner, Counsel to Neustar, Inc., to Marlene H. Dortch, Secretary, FCC at 16 n.36, CC Docket 95-116, WC Docket 09-109 (filed Sept. 23, 2014).

² See Reply Comments of Telcordia Technologies, Inc. at 41-42, WC Docket No. 09-109 & CC Docket No. 95-116 (filed Aug. 22, 2014) (errata filed Sept. 3, 2014).

³ RigNet officially relinquished its Certificate of Authority to Operate as a CLEC in the State of Louisiana on September 5, 2014, see LA Public Service Commission, Summary regarding RigNet SatCom, Inc. (dated Dec. 8, 2014), and its Certificate of Operating Authority from the State of Texas on November 10, 2014. See Public Utility Commission of Texas, Notice of Approval, Docket No. 43077 – Application of RigNet Satcom, Inc. to Relinquish its Service Provider Certificate of Operating Authority (dated Nov. 10, 2014).

⁴ See Section 63.71 Application of RigNet Satcom, Inc. at 2 (Oct. 23, 2014) ("RigNet Discontinuance Application").

⁵ See 47 C.F.R. § 63.71(c).

⁶ RigNet Discontinuance Application, at 2 n.1.

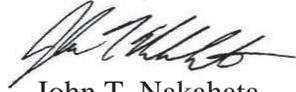
Ms. Marlene H. Dortch
December 9, 2014
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will not be a telecommunications services provider, as defined under either the Communications Act or Section 3.4 of the Vendor Qualification Statement.

For your convenience, attached are RigNet's Section 63.71 Application to discontinue domestic common carrier services, the Louisiana Public Service Commission's Summary confirming that RigNet's is no longer registered in the state, and the Texas Public Utility Commission's Notice of Approval granting RigNet's application to relinquish its certificate of operating authority.

Please contact me if you have any questions.

Sincerely,



John T. Nakahata
*Counsel to Telcordia Technologies, Inc.,
d/b/a iconectiv*

cc: Lisa Gelb
Randy Clarke
Michelle Sclater
Sanford Williams
Ann Stevens
Neil Dellar
Joel Rabinovitz

Attachments

WC 14-239



Received & Inspected

OCT 24 2014

October 23, 2014

Via Overnight Delivery

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

DOCKET FILE COPY DUPLICATE

NOV 14 2014

FCC-Competition Policy Division

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.

MARASHLIAN & DONAHUE, LLC

TELEPHONE: (703) 714-1300 THE COMMLAW GROUP
FACSIMILE: (703) 714-1330 1420 SPRING HILL ROAD
EMAIL: MAIL@COMMLAWGROUP.COM SUITE 401
WEB: WWW.COMMLAWGROUP.COM MCLEAN, VIRGINIA 22102

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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)

RigNet SatCom, Inc.

D.B.A. N/A**Status:** Inactive**Parent Company:** N/A

1101 Connecticut Avenue, NW, Suite 1200

Phone: 281-674-0100

Washington, D.C. 20036

FAX: 504-232-2768**Class:** CAP - Competitive Access Provider, CLEC - Competitive Local Exchange Carrier, LD Carrier**Districts:** District 1, District 2, District 3, District 4, District 5**Parishes:** Statewide**Regulatory Action Suspended:** NO**Date Suspended:****Reason:** N/A**Certificate Number:** TSP00114-C**PSP Cert Number:****Certificate Date:** 1/4/2006 12:00:00 AM**PSP Cert Date:****Revenue Number:** 2445773001**FED Tax ID:****Application Docket #:****Date Filed:****Requires Bond:** No**Date Accepted:****Comments:** Certificate of Authority to Operate as a CLEC relinquished as of 9/5/2014.

Control of assets, ownership and certificate was transferred to RigNet SatCom as of 12/9/2013.

Service Connections:

Residential	Commercial	Industrial	P.A. / Other	Total

Contacts:

Type	Name	Title	Address	Phone/FAX
Regulatory	Bob Ward bob.ward@rig.net	Associate General Counsel	1880 S. Dairy Ashford, Suite 300 Houston, TX 77077	Phone:281-674-0775 FAX: 281-674-0101
Annual Reports	Cindy Neugebauer cneugebauer@jsitel.com	Senior Analyst, Regulatory Affairs	Echelon Building II, Suite 200, 9430 Research Blvd. Austin, TX 78759	Phone:512-338-0473 FAX: 512-346-0822



Control Number: 43077



Item Number: 9

Addendum StartPage: 0

Donna L. Nelson
Chairman

Kenneth W. Anderson, Jr.
Commissioner

Brandy D. Marty
Commissioner

Brian H. Lloyd
Executive Director



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PUBLIC UTILITY COMMISSION
FILING CLERK

Rick Perry
Governor

Public Utility Commission of Texas

TO: Dean Fisher
Division Counsel – Western Hemisphere
1880 S. Dairy Ashford, Ste. 300
Houston, TX 77077

Infrastructure and Reliability Division
Legal Division

RE: **Docket No. 43077 - *Application of RigNet Satcom, Inc. to Relinquish its Service Provider Certificate of Operating Authority***

NOTICE OF APPROVAL

This Notice addresses the application of RigNet Satcom, Inc. to relinquish its Service Provider Certificate of Operating Authority (SPCOA). Public Utility Commission of Texas Staff recommends approval of the application. The application is approved.

Fact Statements

1. RigNet was granted SPCOA No. 60191 in Docket No. 19470 on August 12, 1998.
2. The applicant is currently certificated as a data, facilities-based, and resale telecommunications service provider for the entire State of Texas.
3. On September 10, 2014, RigNet requested relinquishment of SPCOA No. 60191.
4. RigNet is not currently providing common carrier services using SPCOA No. 60191 and has no common carrier customers.
5. Because RigNet never provided common carrier services, no customers are affected and no notice was required or is warranted.
6. The applicant was not required to provide any additional or clarifying technical information regarding this application for relinquishment.
7. RigNet took no customer deposits and any and all credits were returned.

9

8. The applicant is technically compliant with the relinquishment criteria set out in P.U.C. SUBST. R. 26.111.
9. RigNet filed a copy of this application with the Commission on State Emergency Communications and the Administrator of the Texas Universal Fund.
10. Commission Staff also provided notification of RigNet's intent to relinquish its certificate to the Commission on State Emergency Communications and the Administrator of the Texas Universal Fund. No notice to the Texas Secretary of State or Texas Comptroller's Office was needed.
11. The Commission's Customer Protection Division complaint database revealed that zero complaints exist for RigNet for the previous 60 months.
12. The applicant provided its number of customers as zero for the previous 60 months.
13. RigNet has a complaint-to-customer ratio of less than six percent; therefore, no further investigation was required.
14. The Commission's Oversight & Enforcement database revealed no outstanding notices of violation against RigNet.
15. The applicant is currently in compliance regarding its CLEC Annual Reporting requirements, but is not currently in compliance with the filing of its HB 1777 quarterly access line count reporting.
16. Commission Staff determined RigNet's status with the Texas Comptroller's Office is "ACTIVE."

Notice

17. Notice of the application was published in the *Texas Register* on September 26, 2014.

Legal Conclusions

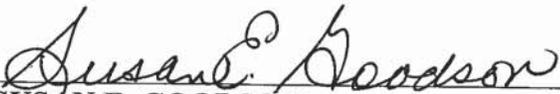
18. The Commission has jurisdiction over this matter pursuant to PURA §§ 14.001, 54.154-.159 of the Public Utility Regulatory Act, TEX. UTIL. CODE ANN. §§ 11.001-66.016 (Vernon 2007 & Supp. 2014) (PURA).
19. RigNet is entitled to approval of this application, having satisfied the requirements of Chapter 54, Subchapter D of PURA and P.U.C. SUBST. R. 26.111(m).
20. Notice of the application was provided in compliance with P.U.C. SUBST. R. 26.111 and P.U.C. PROC. R. 22.54-.55.

Ordering Paragraphs

21. The application of RigNet to relinquish its data, facilities-based, and resale common carrier services SPCOA No. 60191 is approved¹ pursuant to P.U.C. SUBST. R. 26.111. SPCOA No. 60191 is relinquished effective the date of this Notice of Approval.
22. RigNet shall cease all operations and cancel any tariffs or interconnection agreements associated with SPCOA No. 60191. The applicant shall notify the Commission on State Emergency Communications that the certificate has been relinquished.
23. All other motions, requests for entry of specific findings of fact and conclusions of law, and any other requests for general or specific relief, if not expressly granted herein, are hereby denied.

SIGNED AT AUSTIN, TEXAS the 10th day of November 2014.

PUBLIC UTILITY COMMISSION OF TEXAS



SUSAN E. GOODSON
ADMINISTRATIVE LAW JUDGE

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¹ Administrative approval of this uncontested application has no precedential value in a future proceeding.