

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

In the Matter of	)	
	)	
Amendment of Parts 13 and 80 of the Commission’s Rules Concerning Maritime Communications	)	WT Docket No. 00-48
	)	
Petition for Rule Making Filed by Globe Wireless, Inc.	)	RM-9499
	)	
Amendment of the Commission’s Rules Concerning Maritime Communications	)	PR Docket No. 92-257
	)	

**REPLY COMMENTS OF INMARSAT VENTURES LIMITED**

Inmarsat Ventures Limited (“Inmarsat”) hereby submits its reply comments in response to the comments filed regarding the Commission’s Second Further Notice of Proposed Rulemaking (“NPRM”) in the above-captioned proceeding.<sup>1</sup>

Inmarsat supports the amendment of the Commission’s rules to include the Inmarsat Fleet F-77 ship earth station on the list of ship earth stations that are permitted to be used in lieu of a single side band (“SSB”) radio.<sup>2</sup> The Commission has already revised Section 80.905 of its Rules to include Inmarsat A (existing units only), B, C and M. The Inmarsat Fleet F-77 station provides as good or better functionality than Inmarsat A and B and is lighter than either of the stations. Moreover, as the Commission notes, the International Maritime Organization (“IMO”)

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<sup>1</sup> *In the Matter of Amendment of Parts 13 and 80 of the Commission’s Rules Concerning Maritime Communications; Petition for Rule Making Filed by Globe Wireless, Inc.; Amendment of the Commission’s Rules Concerning Maritime Communications, WT Docket No. 00-48, RM-9499, PR Docket No. 92-257, Second Report and Order, Sixth Report and Order, and Second Further Notice of Proposed Rulemaking, 19 FCC Rcd 3120 (2004).*

<sup>2</sup> *See NPRM at ¶ 80.*

accepted the Inmarsat F-77 station as meeting Global Maritime Distress and Safety System (“GMDSS”) requirements. The IMO Maritime Safety Committee specifically “concur[red] with the Sub-Committee’s view that Inmarsat Fleet F-77 communication terminals should be used on GMDSS ships and by MRCCs.”<sup>3</sup> Moreover, commenters support the inclusion of the Inmarsat Fleet F-77 stations on the Commission’s list of ship earth stations that are permitted to be used in lieu of a SSB radio.<sup>4</sup> Such action by the Commission would support the transition and replacement of older, less efficient terminals such as the Inmarsat A terminals and provide ship owners with greater equipment options.

The Commission also sought comment to assist in the formulating of rules to guide the industry in making communications equipment to meet the needs of Ship Security Alert Systems (“SSAS”).<sup>5</sup> Inmarsat cautions the Commission against setting requirements that create standards beyond those currently established by the IMO and the U.S. Coast Guard. As the IMO states:

The intent of the ship security alert system is to send a covert signal or message from a ship which will not be obvious to anyone on the ship who is not aware of the alert mechanism. . . . The procedures for the security alert are agreed with the ship’s Administration as part of the ship security plan and ideally should be individual to the ship. It is not intended that the ship security alert procedures should be to an internationally agreed standard or conform to any particular format for all ships.<sup>6</sup>

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<sup>3</sup> See IMO Maritime Safety Committee (MSC) Final Report, paper MSC 75/23 at ¶ 11.14 (2004).

<sup>4</sup> See Comments of the National GMDSS Task Force, WT Docket No. 00-48, RM-9499, PR Docket No. 92-257 at 2 (June 7, 2004) (“Task Force Comments”) and Comments of the Radio Technical Commission for Maritime Services (RTCM), WT Docket No. 00-48, RM-9499, PR Docket No. 92-257 at 5 (June 7, 2004) (“RTCM Comments”).

<sup>5</sup> See NPRM at ¶ 85.

<sup>6</sup> IMO MSC/Circ. 1072, *Guidance on Provision of Ship Security Alert Systems* at ¶ 2 (June 26, 2003).

By establishing stricter standards, the Commission may limit the diversity of SSAS available to ship operators and inadvertently provide information to pirates and other bad actors that might be used to circumvent SSAS. RTCM states that it “is not aware on any other standards that have been developed *or which are needed for SSAS* operating through services other than Cospas-Sarsat.”<sup>7</sup> The imposition of SSAS requirements for non-Cospas-Sarsat systems beyond those specified by the IMO is unnecessary and could inadvertently undermine the ship security alert systems the Commission seeks to support.

Finally, as the U.S. Coast Guard and RTCM note, Inmarsat D plus equipment is currently available and is suitable for transmission of SSAS alerts.<sup>8</sup> Inmarsat urges the Commission to authorize the use of Inmarsat D plus in the U.S. for SSAS.<sup>9</sup>

Respectfully submitted,

/s/ Alexander D. Hoehn-Saric  
John P. Janka  
Alexander D. Hoehn-Saric  
LATHAM & WATKINS LLP  
555 11<sup>th</sup> Street, N.W., Suite 1000  
Washington, D.C. 20004  
(202) 637-2200 (phone)  
(202) 637-2201 (fax)

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<sup>7</sup> RTCM Comments at 7 (emphasis added).

<sup>8</sup> See Letter from J. Hersey, Jr., Chief Spectrum Management Division, U.S. Coast Guard to Fredrick R. Wentland, Associate Administrator, NTIA at 3 dated June 2, 2004 attached to letter from Fredrick R. Wentland, Associate Administrator, NTIA, to Edmond J. Thomas, Chief, Officer of Engineering and Technology, FCC, filed June 7, 2004 (“U.S. Coast Guard Comments”); RTCM Comments at 8.

<sup>9</sup> See U.S. Coast Guard Comments at 3 (“As SSAS systems using Inmarsat D+ equipment are available, we request the Commission ensure its regulations allow such equipment to be fitted on ships.”); see also Task Force Comments at 4 (urging the Commission to “take prompt action to authorize use of Inmarsat-D Plus in the U.S. since that system is also a candidate to satisfy SSAS requirements”).