

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

In the Matter of)	
)	
Radio Technical Commission for Maritime Services)	RM-11667
)	
Petition for Rulemaking to Amend Part 95 of the Commission's Rules to Provide For Certain Personal Radio Service Devices)	

COMMENTS OF IRIDIUM SATELLITE LLC

Iridium Satellite LLC ("Iridium") hereby files these comments addressing the Petition for Rulemaking ("Petition") filed by the Radio Technical Commission for Maritime Services ("RTCM") in the above-captioned proceeding. For reasons that are discussed below, Iridium supports RTCM's request that the Commission update Part 95, Subpart K of the Commission's rules by incorporating the standards developed by RTCM for the operation of Satellite Emergency Notification Devices ("SENDs").

I. Interest of Iridium

Iridium's constellation of low earth orbit ("LEO") satellites supports a range of innovative solutions, developed through Iridium's manufacturing partners, for transmitting emergency distress signals to nearby organizations to facilitate search and rescue ("SAR") teams. Iridium has been working for several years with other mobile satellite service ("MSS") companies, resellers, device manufacturers, safety organizations and other members of the SAR community to speed the adoption of

portable, two-way satellite-based location, tracking and messaging technologies that will enable first responders and rescuers to verify distress calls.

In 2009, Iridium joined with MSS companies and the emergency response community to found the ProTECTS Alliance (Promotion of Two-way Emergency Communication and Tracking Systems), which is now a working group of the RTCM. Through that working group and the RTCM Special Committee 128 on SENDs, Iridium has actively participated in the development of RTCM Standard 12800.0 for SENDs. In its Petition, RTCM has proposed that Standard 12800.0 be incorporated into the Commission's rules. Iridium fully supports RTCM's proposal.

II. There is a Need for the SENDs Standard Sought To Be Incorporated into the Commission's Rules

There has been significant market growth in the area of personal satellite tracking and messaging devices. Although such devices previously were used predominantly by military users, innovations and increased functionality have led to increased use of these devices by consumers, particularly consumers traveling to remote and rural areas. Because of the increased presence of such devices, both the U.S. Coast Guard and the U.S. Air Force have recognized the important role the devices could play in increasing the diversity of options available to support search and rescue operations. They also have sought standards to ensure that these devices would rapidly and reliably provide the information required by SAR authorities to mount to successful search and rescue operations. Standard 12800.0 is responsive to these needs.

III. The Proposed SENDs Standard is in the Public Interest

No use of the radio spectrum is more essential to the public interest than effective and reliable emergency distress communication. Standard 12800.0 advances these important objectives. It reflects the consensus inputs of key stakeholders from both government and industry, taking account of the requirements of the search and rescue community and the safety of consumers of SENDs. This standard is designed to ensure that devices used for tracking in emergency situations will rapidly and reliably provide rescue teams with sufficient information to mount a successful search and rescue operation.

Standard 12800.0, therefore, furthers the public interest, and Iridium urges the Commission to initiate a rulemaking proceeding expeditiously so that the agency's rules can be updated to reflect the standard.

Respectfully submitted,

IRIDIUM SATELLITE LLC

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August 22, 2012

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **COMMENTS OF IRIDIUM SATELLITE LLC** was sent electronically on this 22nd day of August, 2012, to the following:

Radio Technical Commission for Maritime Services
1800 N. Kent St., Suite 1060
Arlington, Virginia 22209-2109

/s/ Joseph A. Godles
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