

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

In the Matter of)	
)	
Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications)	PS Docket No. 11-153
)	
Framework for Next Generation 911 Deployment)	PS Docket No. 10-255
)	

REPLY COMMENTS OF INMARSAT

Inmarsat, Inc. (“Inmarsat”) submits these Reply Comments in the above-captioned proceeding to clarify in the record that the current and proposed text-to-911 rules do not extend to Mobile Satellite Services (“MSS”).¹

I. Inmarsat’s Service is a Traditional MSS Offering Distinct From Consumer-Oriented Terrestrial CMRS

Inmarsat offers voice and data capabilities via handheld and portable devices to a specialized market, including government, critical infrastructure and other large enterprise users, such as military, public safety and energy exploration companies. Inmarsat’s services are not mass-market consumer offerings. For example, Inmarsat’s Global Satellite Phone Service (“GSPS”) – like other MSS services – has a more limited customer base than CMRS services, a far lower volume of handsets, and significantly fewer choices of handsets as compared to terrestrial CMRS. GSPS, in fact, has just *two* handsets on the market worldwide.

¹ See Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications; Framework for Next Generation 911 Deployment, PS Docket Nos. 11-153, 10-255, *Policy Statement and Second Further Notice of Proposed Rulemaking*, 29 FCC Rcd 1547 (2014) (“*Second Further Notice*”).

The development of Inmarsat's GSPS network took years of effort in order to produce the first and second generation handsets with the special features needed to reliably access a global satellite network that is 22,000 miles in space, including from the most remote and inhospitable locations on earth. Every MSS network is unique, and therefore Inmarsat's GSPS network had to be custom designed to ensure reliable and high quality service using the Inmarsat I-4 satellite constellation.

In short, Inmarsat's services are not designed for the mass-market, consumer-level retail market that is the focus of this proceeding. As discussed below, these facts are all relevant to a determination that text-to-911 requirements should not be imposed on services offered by MSS providers like Inmarsat.

II. MSS Services Should Not be Subject to the Text-to-911 Requirements Contemplated in this Proceeding

In 2003, the Commission exempted MSS carriers from CMRS Enhanced 911 ("E911") obligations.² As Gogo Inc. ("Gogo") explained in its comments, the Commission has consistently treated MSS separately from terrestrial CMRS for purposes of 911 due to significant differences in the technical and practical aspects of the services.³ Instead, the Commission

² See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, *Report and Order and Second Further Notice of Proposed Rulemaking*, 18 FCC Rcd 25340, ¶ 37 (2003) ("*E911 Report and Order*"); 47 C.F.R. § 20.18(a) (stating that the 911 Service requirements "are only applicable to CMRS providers, excluding mobile satellite service (MSS) operators . . .").

³ See Comments of Gogo Inc. at 5-6, PS Docket No. 11-153, 10-255 (filed Apr. 4, 2014) (seeking "to exempt in-flight communications services, including interconnected text services, from any 911 requirements").

required MSS providers to establish centralized call centers to initially receive all subscriber 911 calls.⁴

This proceeding neither proposes to apply the text-to-911 rules to MSS, nor finds changed circumstances to justify such a change. To the extent there is any ambiguity on this point, Inmarsat requests that the Commission's Order in this proceeding clarify that MSS is explicitly excluded.

III. MSS-Only Offerings are Not the Same as CMRS

Requiring that MSS services be text-to-911 compliant would have significant repercussions on the affordability and availability of new innovative MSS services to critical infrastructure, government and enterprise customers. As noted above, because of the specialized MSS customer base and significantly lower number of subscribers, MSS is very different than CMRS. Moreover, because every MSS satellite network is unique and must be designed differently, MSS network operators are not able to take advantage of the economies of scale available to CMRS providers. Any potential costs of implementation cannot be spread across a large customer base or easily carried forward into new offerings, which emerge far less frequently than for terrestrial CMRS.

Finally, given the type of enterprise and government users that are the focus of the traditional MSS customer base, and in light of the technical and economic challenges described above, it would not be appropriate to impose text-to-911 provisions on traditional MSS services.

⁴ Section 25.284 governs MSS 911 obligations which require “[p]roviders of mobile satellite service to end-user customers . . . [to] provide Emergency Call Center service to the extent that they offer real-time, two way switched voice service that is interconnected with the public switched network and utilize an in-network switching facility which enables the provider to reuse frequencies and/or accomplish seamless hand-offs of subscriber calls.” 47 C.F.R. § 25.284(a).

IV. Conclusion

Inmarsat respectfully requests that the Commission continue to treat MSS separately from terrestrial CMRS for purposes of 911 due to significant differences in the technical and practical realities of the services.

Respectfully submitted,

/s/

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