



1101 Connecticut Avenue, N.W.
Suite 1200
Washington D.C. 20036

December 2, 2013

SUBMITTED VIA EMAIL
to innovation@fcc.gov

Diane Cornell
Special Counsel to Chairman Wheeler
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Inmarsat Input on FCC Process Reform

Dear Ms. Cornell:

In response to your blog post of November 18, 2013 calling for input on improving the efficiency of the Commission's processes, Inmarsat offers the following suggestions aimed at streamlining some of the International Bureau's processes:

Satellite Applications

- **Replace the requirement to provide Schedule S information with the ITU Appendix 4 form.** The ITU form includes all technical information needed to determine the interference profile of the satellite and to facilitate coordination between operators.
- **To the extent the Commission maintains the requirement to file the Schedule S, afford confidential treatment to all technical specifications.** Much of the information in the Schedule S is highly sensitive and would not be shared with competitors other than under a nondisclosure agreement.
- **Place reasonable bounds on the application of the "letter perfect" standard for satellite applications.** In order to ensure consistent application of this standard, the International Bureau should identify a limited number of material data points that must be included in the application in order to be deemed substantially complete. Applications should not be dismissed for minor inconsistencies or errors that are not material. In addition, the public

notice process is sufficient to identify significant deficiencies in an application.

- **Satellite construction milestone evidence.** The Commission should limit the evidentiary information required for satellite construction milestones. The production of satellite construction contracts and critical design review documents as part of the ordinary satellite milestone construction review process is problematic. These documents are extremely voluminous and highly proprietary making public disclosure difficult and Commission reliance challenging. They should only be required upon request where the Commission has particular concerns. Satellite construction bonds and physical construction of satellites along with sworn statements by satellite manufacturers and photographs should be sufficient for evidence of routine satellite construction milestone progress.
- **Make available on the International Bureau website a link to all satellite application dismissal letters, practice guideline public notices, and declaratory rulings with procedural implications.** Precedent in these letter rulings, instructions in public notices, and declaratory rulings with procedural advice, serve as useful guidance to applicants preparing satellite applications. Ideally, the Commission could organize these materials into a logical structure to allow for ease of access or present them in the satellite application procedures primer described below.
- **Maintain a list on the International Bureau website of the orbital locations and frequency bands currently authorized by the FCC.** Such a list will help applicants determine the locations and frequencies that are available for licensing and market access.
- **Publish a primer on satellite application procedures, including practical guidance on navigating the International Bureau's review process and electronic filing systems and databases.** Such guidance has previously been provided with respect to earth station licensing and would be extremely useful for space station applications.
- **Recognize and support use of industry-led solutions to public interest issues – Space Data Association.** The Commission could recognize and encourage industry-led solutions to important public interest issues, such as safe flight activities and orbital debris mitigation. For example, the Space Data Association provides an industry-led database for safe space flight coordination between both public and private operators. (www.space-data.org/sda/)

General

- **Consolidate reporting.** Consolidate reporting requirements into a single annual report.
- **Issue license fee and renewal notices.** As is common practice in the Wireless Telecommunications Bureau, the International Bureau could issue licensees with an electronic fee invoice at least 30-60 days in advance of the due date to ensure proper fee calculations and payment as well as providing an audit trail for the Commission and licensees. A similar notice could be provided for license renewals.
- **Encourage parties to submit draft orders to speed resolution of contested matters.**

Inmarsat believes that these proposed modifications to the International Bureau's procedures can be effectuated either without rule changes or through a waiver on the Commission's own motion of certain processing rules. These proposals would improve efficiency in the use of scarce Commission resources. In addition, the public interest will be benefited by the greater transparency in the Commission's processes that would result from these proposals.

Inmarsat understands that any effort put into the implementation of these changes will take resources away from the Commission's ability to process applications on a day-to-day basis in the short-term. The procedural reforms proposed as part of this process will, however, hopefully save significant amounts of time and resources in the future. Freeing up Commission resources will allow the Commission and licensees to focus on new and more significant challenges.

Please feel free to contact me if you have any questions.

Respectfully submitted,

/s/

Christopher J. Murphy
Vice President, Government Affairs