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August 9, 2017

Chairman Ajit Pai  
Commissioner Mignon Clyburn  
Commissioner Michael O'Rielly  
Commissioner Jessica Rosenworcel  
Commissioner Brendan Carr  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

**RE: IB Docket No. 98-96 – 1998 Biennial Regulatory Review – Review of Accounts of Settlement in the Maritime Mobile and Maritime-Satellite Radio Services and Withdrawal of the Commission as an Accounting Authority in the Maritime Mobile and Maritime-Satellite Radio Services (“2016 Accounting Authority Second FNPRM”)**

Dear Chairman Pai and FCC Commissioners:

I am pleased to see that the current Commission is making a concerted effort to close long-pending proceedings that have languished over the years. Addressing and closing these proceedings is essential to bringing certainty to vital sectors of the economy, which will, in turn, encourage innovation and stimulate the economy. Similarly, I applaud your efforts to usher in a new era of transparency and openness at the Commission. These initiatives are in the best interests of industry participants and taxpayers alike.

I have been alerted to recent action by the FCC in a long-standing docket addressing the Commission's role as the accounting authority of last resort.<sup>1</sup> This proceeding is of particular interest to me given the important maritime safety issues pursuant to the FCC's determination to cease operating as the default accounting authority. I have had the opportunity to review the Commission's December 2016 Second Notice of Proposed Rulemaking, as well as the comments submitted in the docket.

I am encouraged that the Commission is re-visiting this issue, and I am in agreement with the Commission's decision to exit this role as I believe that these functions are more properly filled by the private sector, rather than by a government agency. However, I do remain concerned regarding the adequacy of the Commission's transition plans and share concerns raised by the U.S. Coast Guard.

Based on my understanding of the issue, relying solely on an outreach effort to migrate all current users to a new accounting authority has many downsides. Over-dependence on outreach efforts will likely further

<sup>1</sup> 1998 Biennial Regulatory Review – Review of Accounts Settlement in the Maritime Mobile and Maritime Mobile-Satellite Radio Services and Withdrawal of the Commission as an Accounting Authority in the Maritime Mobile and Maritime Mobile-Satellite Radio Services, *Second Further Notice of Proposed Rulemaking*, 31 FCC Rcd 13785 (2016) (*Second Further Notice*).

delay the Commission's long-stated desire to exit the role of accounting authority of last resort, and it would require unnecessary expenditure of Commission resources and taxpayer dollars.

An outreach effort to reach a majority of users would need to be robust, coordinated, overly complex, and extremely labor intensive. Furthermore, the Coast Guard noted that there is no guarantee of success. In short, regardless of the cost or expansiveness of any outreach effort, there are concerns that not all users will take the necessary proactive steps to register with a new accounting authority once the Commission exits that role.

Should maritime users not receive the notice or fail to act on it, the Commission's plan could pose real and substantial safety risks. Users who either do not have access to or simply ignore the Commission's outreach efforts will lose access to life-saving communications services. This puts ocean-going vessels in danger and imposes an unreasonable additional burden on the Coast Guard.

**Rather than relying on a cumbersome, protracted process with serious questions of universal success, has the Commission considered simply assigning its US01 designation to COMSAT, INC., the only party on the record that has expressed the willingness and documented ability to serve as the replacement default accounting authority? It would seem to be that this would be the obvious and less burdensome solution.**

My understanding is that while there have been multiple opportunities for other private entities to come forward and volunteer to fill the gap left by the Commission's departure from serving as the authority of last resort, COMSAT is the only one that volunteered to assume the role of default accounting authority. As I am sure you will agree, it is of the utmost importance that we ensure the continuity of lifesaving maritime communications by maintaining this critical service.

COMSAT has more than a fifty-year history in the industry of satellite communications. As I understand it, COMSAT currently serves as an accounting authority under the designation US11, and the U.S. Coast Guard has recognized its capability of assuming the role of default accounting authority. As you know, assigning the role of accounting authority to COMSAT would in no way obligate any party to use the organization as their accounting authority. Instead, COMSAT would stand by to fill the role should a user fail to affirmatively choose to appoint an accounting authority.

Given the location and demographics of my district, issues of maritime safety are of a paramount concern to my constituents and to me. The Commission is presented with an opportunity to avoid unnecessary red tape, save taxpayer dollars, and ensure the continuity of lifesaving maritime communications services. Based on the above, please give full and fair consideration to COMSAT's request to take on the Commission's role of default accounting authority. Thank you for your time on this matter, and I look forward to any feedback you can provide on this alternative.

Sincerely,



Bill Posey  
Member of Congress

Cc: Rachael Bender  
Erin McGrath  
Dana Shaffer