

**BEFORE THE**  
**Federal Communications Commission**  
**WASHINGTON, D.C. 20554**

Application of )  
 )  
**SatCom Global, Inc.** ) FCC File No. \_\_\_\_\_  
 )  
For Modification of Section 214 Authorization )  
Granted Under File No. ITC-214-20000803- )  
00478 To Remove Condition )

To: Chief, Telecommunications and Analysis Division  
International Bureau

**APPLICATION FOR MINOR MODIFICATION OF  
INTERNATIONAL SECTION 214 AUTHORIZATION**

Broadband Satellite Services Limited (“BSS”), on behalf of its wholly-owned subsidiary SatCom Global, Inc. (“SGI”), hereby requests a minor modification to the above-captioned international Section 214 authorization to remove conditions originally agreed to in 2008 and made a condition of the current license in 2014 in connection with final action in FCC File No. ITC-T/C-20130612-00172. This request is prompted by a notification from the Department of Homeland Security (“DHS”) on behalf of the itself and the Department of Justice (“DOJ”) that the subject conditions are no longer required to address national security, law enforcement and public safety concerns.

On September 1, 2000, the International Bureau granted World Communication Center, Inc. (“WCC”) a Section 214 authorization for provision of global resale service pursuant to Section 63.18(e)(2) of the Commission’s Rules. The authorization was granted without condition.<sup>1</sup>

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<sup>1</sup> See FCC Public Notice, “International Authorizations Granted,” Report No. TEL-00284, DA 00-2050, at 2 (rel. Sept. 7, 2000) (FCC File No. ITC-214-20000803-00478).

On December 5, 2006, the Commission consented to the transfer of control of WCC and its Section 214 authorization to SatCom Distribution, Inc. (“SDI”), a Delaware corporation, which was at that time a wholly-owned indirect subsidiary of SatCom Group Holdings Plc (“SatCom Group”), a public company established under the laws of the United Kingdom.<sup>2</sup> Subsequently, SatCom Group notified the Commission that WCC had changed its name to SGI.<sup>3</sup>

On September 24, 2008, SatCom Group entered into an agreement (“NSA”) with DOJ and DHS governing services proposed by another SatCom Group subsidiary, Horizon Mobile Communications, Inc. (“Horizon”), for operation of up to 20,000 mobile earth terminals in conjunction with Inmarsat's Broadband Global Area Network (“BGAN”) Service satellite. The NSA imposed on Horizon specific information storage and access, physical and electronic security, and reporting and notice requirements. It also provided that each of Horizon’s FCC authorizations must include an express condition making it subject to compliance with the provisions of the NSA.

On January 20, 2011, SatCom Group changed its name to One Horizon Group, plc (“One Horizon”).<sup>4</sup> Subsequently, One Horizon sought to transfer control of both Horizon and SGI to BSS, which is the current parent company of both of these entities. In connection with the grant of that application, and as requested in a February 4, 2014 DOJ Petition to Adopt Conditions to Authorizations and Licenses, the Commission expressly conditioned the transfer on SGI “abiding by the commitments and undertakings set forth in the January 31, 2014 letter of assurance

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<sup>2</sup> See FCC Public Notice, “International Authorizations Granted,” Report No. TEL-01094, DA 06-2477, at 4 (released Dec. 7, 2006) (FCC File No. ITC-T/C-20060727-00368).

<sup>3</sup> See FCC Public Notice, “International Authorizations Granted,” Report No. TEL-01472, DA 10-2367, at 4 (released Dec. 16, 2010) (“By letter dated November 16, 2010, the Commission was notified that World Communication Center, Inc. has changed its name to SatCom Global, Inc.”).

<sup>4</sup> The Commission was notified of this name change on November 7, 2011. See Notification of Pro Forma Transfer of Control, FCC File No. ITC-T/C-20130122-00014, Attachment 1 a 3 (footnote).

(LOA).”<sup>5</sup> The LOA, in turn, stated that BSS and SDI “will continue to abide by and be bound by, and comply with, the terms conditions and requirements” of the 2008 NSA applicable to Horizon and SGI.<sup>6</sup> Accordingly, all of the recordkeeping, security, access and reporting requirements agreed to in the NSA became directly applicable to the SGI Section 214 authorization.

The following year, on December 21, 2015, Horizon formally surrendered the Section 214 authorization that allowed it to provide Inmarsat BGAN services as a facilities-based and resale provider.<sup>7</sup> As of that time, the company had no customers using this service. Indeed, more than two years earlier, on May 1, 2013, it had surrendered the earth station license that supported the facilities-based provision of the BGAN service.<sup>8</sup> Accordingly, neither Horizon nor SGI has provided within the last three years the services that originally gave rise to the conditions on their respective authorizations and licenses.

Last year, in response to annual report filings submitted pursuant to the NSA and requests from Horizon and SGI to modify the terms of the NSA to remove any reference to the BGAN service or Horizon, DHS notified BSS’s counsel that it and DOJ “would be willing to favorably consider a company request to remove the 2008 NSA as a condition on the FCC license.”<sup>9</sup> In so

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<sup>5</sup> See FCC Public Notice, “International Authorizations Granted,” Report No. TEL-01658, DA 14-222, at 4 (rel. Feb. 20, 2014) (FCC File No. ITC-T/C-20130612-00172).

<sup>6</sup> Letter from Ian Robinson, CEO, BSS, to John Carlin, Acting Ass’t Attorney General, National Security Division, DOJ, and David Heyman, Ass’t Secretary for Policy, DHS (dated Jan. 31, 2014).

<sup>7</sup> See Letter from Stephen E. Coran and David S. Keir, Counsel to Horizon, to Marlene H. Dortch, Secretary, FCC, File No. ITC-214-20070110-00021 (dated Dec. 21, 2015).

<sup>8</sup> See Surrender of License, File No. SES-LFS-20070109-00042 (Call sign E070006), dated May 1, 2013 (“due to changed business and customer circumstances occurring *after* the grant of the License, no use was ever made of the License by Horizon Mobile”) (emphasis in original).

<sup>9</sup> Email correspondence from Melissa Figueroa, Team Telecom, Foreign Investment Risk Management, DHS Office of Policy, to Stephen E. Coran, Counsel to BSS, SGI and Horizon, RE: Horizon Mobile Communications, Inc. – Annual Report (sent Aug. 27, 2018).

doing, DHS affirmatively suggested that SGI file with the FCC a request to remove the condition.

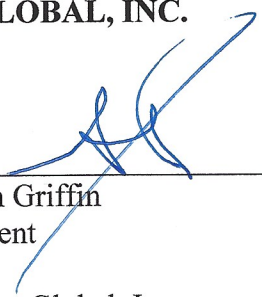
This modification application acts on DHS's suggestion. BSS and SGI hereby affirmatively seek the removal of the condition applying the requirements of the 2008 NSA to the SGI Section 214 authorization. As detailed above, the specific reporting and other requirements included in the NSA arose from a service offering of SGI's affiliate, Horizon, that is no longer being provided to customers. For this reason, it is entirely appropriate that the condition on the license be removed. Such action will comport with the approach suggested by the interested U.S. Government agencies and will promote the public interest by both enhancing administrative efficiency and removing unnecessary regulatory burdens.

WHEREFORE, BSS and SGI respectfully request that the Commission modify its Section 214 authorization issued under FCC File ITC-214-20000803-00478 to remove the condition mandating compliance with the 2008 NSA pursuant to the commitments and undertakings set forth in the January 31, 2014 LOA signed by Ian Robinson, CEO of BSS.

Respectfully submitted,

**BROADBAND SATELLITE SERVICES LTD.  
SATCOM GLOBAL, INC.**

By: \_\_\_\_\_

  
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