

EXPLANATION OF FILING

Maritime Communication Services, Inc. (“MCS”) is submitting this FCC Form 312 to modify its authority for Earth Station E990543 from Common Carrier to Non-Common Carrier status. The application is consistent with the manner in which MCS provides satellite services.

MCS provides managed VSAT services for the maritime community, remote land-based installations, and autonomous (buoy) systems. MCS enters into individualized negotiations with customers, its contracts and service offerings are tailored to particular customer needs, and its customer base is comprised of a long-term, stable clientele of large domestic and multi-national corporations. MCS’s service offerings bear no resemblance to the generally available commoditized service offerings of common carriers, whose services are provided pursuant to standardized rates, terms, and conditions.

Should the Commission have any questions or need any additional information, it is requested to contact Doug Jarrett (jarrett@khlaw.com, 202.434.4180) or Greg Kunkle (kunkle@khlaw.com, 202.434.4178) of Keller and Heckman LLP, 1001 G Street, N.W., Suite 500 West, Washington, D.C. 20001.