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May 13, 2011

Writer's Direct Access  
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**Via Electronic Mail**

Paul Blaise, Branch Chief  
International Bureau  
Satellite Division  
Systems Analysis Branch  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: Maritime Communication Systems, Inc., Application to Change  
License Status to Non-Common Carrier; Earth Station E990543;  
File No. SES-MOD-20110407-00413

Dear Mr. Blaise:

This follows up on my discussion with Alyssa Roberts on May 12, 2011, in regard to the referenced application. In this discussion and earlier discussions this week with Commission staff, we responded to questions regarding and explained the reasons why Maritime Communications Systems, Inc. ("MCS") is looking to change the status of this earth station license. This letter serves to summarize those discussions.

Principally, MCS has always conducted its business as a private carrier, as described in the exhibit to the application. It provides satellite communications service, equipment, and installation and management services for the maritime transport and resource extraction industries. It never focused on traditional public correspondence or high density fixed route services. The dichotomy between its licensee status and its business operations came into sharp focus in 2010 when MCS's parent Harris Corporation acquired CapRock Communications, Inc. ("CapRock").

CapRock provides the same suite of services as MCS, but on a much larger scale. Consistent with the nature of its business, CapRock has always aligned its earth station licensee status with its private carrier operations. As result of MCS and CapRock becoming commonly owned affiliates in the same line of business, the two affiliates have taken steps to harmonize operations and businesses. The instant application is one aspect of this effort.

KELLER AND HECKMAN LLP

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We believe the foregoing is a reasonable summary of our discussions. Please contact me with any questions, preferably by telephone.

Very truly yours,



C. Douglas Jarrett

Cc: Alyssa Roberts

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