

## Narrative Description and Public Interest Statement

By this application, RigNet Satcom, Inc. (“RigNet”) seeks Commission authority to modify its existing Ku- and C-band earth station onboard vessel (“ESV”) network license, Call Sign E980235. Specifically, RigNet seeks to: (i) convert the license from a common carrier to non-common carrier authorization; (ii) remove certain existing remote terminals and an earth station hub from the license; (iii) add “Permitted List” as a point of communication for certain existing remote terminals; (iv) add certain ESV terminal types to the license; and (v) change the remote control point for the ESV network. The proposed modification will allow RigNet to continue to provide essential satellite communications services to customers in the maritime and oil and gas industries, where alternative communications services are not available.

### **I. Non-Common Carrier Authorization**

First, RigNet seeks to convert the subject license from a common carrier authorization to a non-common carrier authorization. ESV services are generally provided to commercial customers via individually negotiated, private offerings and there is no requirement to provide such services on a common carrier basis. The conversion of the license to a non-common carrier authorization is also consistent with other ESV network classifications and will align RigNet’s authorization type with operators of similar networks.<sup>1</sup> Furthermore, the Commission recently granted a similar reclassification of a common carrier authorization to non-common carrier and thus the present reclassification is consistent with Commission precedent.<sup>2</sup> Reclassification of the authorization would serve the public interest by ensuring that customer demand for individually tailored offerings is met and by promoting competition.

### **II. Removal of Equipment**

RigNet also seeks to remove certain equipment currently authorized under the subject license. Specifically, RigNet seeks to remove two (2) remote terminals from its license, the 1.2m Channel Master Model 120 remote terminal (REMOTE 2) and the 1.2m Sea Tel Model 4996T remote terminal (REMOTE 5), which are no longer being used. Furthermore, RigNet seeks to remove the 4.5m Andrew Model ESA 45-46B earth station hub (HUB-1) from its existing

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<sup>1</sup> See, e.g., Call Sign KA399.

<sup>2</sup> See, e.g., File No. SES-MOD-20150211-00071.

license, which has been dismantled and is no longer in use. Removal of the above-mentioned equipment from RigNet's license will ensure that RigNet's authorization accurately reflects its present operations and network configuration.

### **III. Add Point of Communication**

RigNet further seeks to add "Permitted List" as an authorized point of communication for the REMOTE 3 (2.4m Channel Master Model 243) and REMOTE 4 (1.2m Prodelin Model 1123) terminals. RigNet certifies that the technical parameters of REMOTE 3 and REMOTE 4 are consistent with the Commission's rules regarding the technical requirements for earth stations to access Permitted Space Station List satellites, including compliance with the off-axis EIRP spectral density map for Ku-band ESV terminals pursuant to Section 25.222 of the Commission's Rules, 47 C.F.R. § 25.222.

### **IV. ESV Terminal Additions**

Pursuant to Sections 25.134, 25.221 and 25.222 of the Federal Communications Commission Rules, 47 C.F.R. §§ 25.134, 25.221, 25.222, RigNet seeks to add certain ESV terminals to the subject Ku- and C-band VSAT network license, Call Sign 980235. Specifically, RigNet seeks to add the following ESV terminal types, each of which has been previously authorized by the Commission:

- 300 Intellian Model v100 1m stabilized Ku-band ESVs (ESV R-6);<sup>3</sup>
- 300 Intellian Model v130 1.05m stabilized Ku-band ESVs (ESV R-7);<sup>4</sup>
- 300 Thrane & Thrane (Cobham) Sailor 900B 1.03m stabilized Ku-band ESVs (ESV R-8);<sup>5</sup>
- 300 Thrane & Thrane (Cobham) Sailor 800 .83m stabilized Ku-band ESVs (ESV R-9);<sup>6</sup>
- 300 Sea Tel Model 6012 1.5m stabilized Ku-band ESVs (ESV R-10);<sup>7</sup>

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<sup>3</sup> See File No. SES-MOD-20131108-00955 (Call Sign: KA313).

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

<sup>7</sup> See File No. SES-MOD-20140212-00056 (Call Sign: KA399).

- 300 Sea Tel Model 9797 2.4m stabilized Ku-band ESVs (ESV R-11);<sup>8</sup>
- 300 Sea Tel Model 9711 2.4m stabilized Ku-band ESVs (ESV R-12);<sup>9</sup> and
- 300 Sea Tel Model 9711 2.4m stabilized C-band ESVs (ESV R-13).<sup>10</sup>

These Ku- and C-band ESVs will be used in RigNet's authorized network to provide a wide array of broadband satellite communications services to marine barges and vessels in motion, as well as on stationary oil drilling platforms and mobile rigs, in U.S. and international waters (*see* Area of Operations Exhibit). The C-band ESV's will not be operated within 200 km from the baseline of the United States or a U.S.-licensed fixed service offshore installations absent coordination pursuant to 47 C.F.R. § 25.221.<sup>11</sup>

The ESVs will be used in concert with licensed hub earth stations located throughout United States and will only communicate with U.S. licensed satellites and non-U.S. licensed satellites on the Commission's Permitted Space Station List. As noted, each Ku- and C-band ESVs proposed in the present application have been previously licensed by the Commission for maritime and remote industry operations.

The attached FCC Form 312, Schedule B and associated exhibits to this application contain the relevant information required under 47 C.F.R. §§ 25.134, 25.221 and 25.222 of the Commission's Rules. More specifically, Exhibits C, D, E, G and H demonstrate Ku-band ESV compliance under Section 25.222 and Exhibits F and I demonstrate C-band ESV compliance under Section 25.221. A radiation hazard study for each Ku- and C-band ESV is provided as Exhibit A.

## **V. Remote Control Point**

Finally, RigNet seeks to update its license to change the remote control point for its ESV network terminals. Currently, the remote control point for all ESV and remote terminals is 1710 W. Willow Street, Lafayette, Louisiana 70583, the same location as the hub earth stations

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<sup>8</sup> See File No. SES-MOD-20140212-00056 (Call Sign: KA399).

<sup>9</sup> See File No. SES-MOD-20131108-00955 (Call Sign: KA313).

<sup>10</sup> See File No. SES-LIC-20141221-00919 (Call Sign: E140128).

<sup>11</sup> See, e.g., Public Notice, Report No. SES-0176 (notifying that RigNet filed a letter of notification of completion of C-band ESV coordination for an oil platform in Alaska),

authorized under the subject license. While RigNet will continue to utilize the hub earth station facilities at the Lafayette, LA location, the management and control of the network terminals will be conducted via RigNet's Network Operations Center ("NOC") located at 1301 Fannin Street, Suite 745, Houston, Texas 77002. Furthermore, the ESV network terminals may also communicate with other certain independently licensed third-party hub earth stations, but will be remotely controlled at all times from the Houston, Texas NOC facility.<sup>12</sup>

## **VI. Public Interest**

Grant of this application will serve the public interest by allowing RigNet to continue to provide essential connectivity services to users in the maritime and oil and gas industries for critical operational communications, as well as for broadband Internet access, crew welfare and related communications applications, in remote locations. RigNet will provide broadband satellite services to a wide array of users in offshore locations, including marine barges, support vessels and oil platforms, that may be unable to obtain communications services through alternative facilities. Using stabilized ESV antennas, RigNet will also be able to serve mobile oil and gas support vessels and other in-transit maritime users. Users will be able to utilize high-speed Internet access, corporate VPN, e-mail, voice and other services, including emergency communications to supplement other communications capabilities. Conversion of the license to a non-common carrier authorization would also serve the public interest by promoting competition and ensuring that customer demand for individually tailored offerings is met.

## **VII. Conclusion**

Based on the foregoing, RigNet respectfully requests that the Commission expeditiously grant its request to modify its existing commercial license (Call Sign 980235) to convert of the license to a non-common carrier authorization, add "Permitted List" as a point of communication, remove and add certain network equipment and update the network point of control for all ESV terminals.

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<sup>12</sup> The ESV network terminals may communicate with certain hub earth stations licensed under call signs: E060388, E000275, E990541, E920698 and E020191.