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August 3, 2007

VIA ELECTRONIC MAIL

Karl Kensinger
Satellite Division,
International Bureau
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20054

Re: OuterLink Corporation
Application for Transfer of Control
FCC File Number SES-T/C-20070731-01009

Dear Karl:

Please find attached updated narrative and illustrative attachments for the transfer of control application of Outerlink Corporation (“Outerlink”), holder of FCC licensee call sign E980203. The updated attachments include additional information and updated charts addressing the following issues:

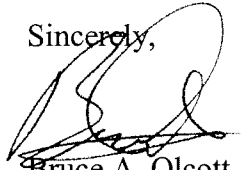
The attachments describe the voting and equity interests of Jeffrey Pollock (14% and 11%, respectively) in MerchantBanc, LLC. The attachments also describe the voting and equity interest of James E. Mann (47% and 46%, respectively) in MerchantBanc, LLC.

The attachments further describe the management and control structure for MB Venture Management II, LLC (“MB Venture”), explaining that MB Venture is managed by two individuals, Jeffrey Pollock and William Wetzel, each of whom have 50% voting control over MB Venture.

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Please let us know if you have any further questions about these matters.

Sincerely,



Bruce A. Olcott

cc: J. Spriggs

OuterLink Corporation
Mobile Satellite Earth Station License E980203
FCC Form 312, Schedule A
Narrative Attachment

Description of the Transaction

OuterLink Corporation (“OuterLink”) holds an FCC license to operate a network of mobile satellite earth stations in the domestic Mobile Satellite Service (“MSS”). OuterLink’s authorization permits it to operate up to 20,000 mobile earth terminals (“METs”), on a non-interference basis, to provide MSS in the United States via the U.S.-licensed satellite, AMSC-1, at 101° W.L. in portions of the L-band spectrum. OuterLink’s MSS operations consist primarily of vehicular asset tracking services for trucks and aircraft.

OuterLink Corporation is a wholly owned subsidiary of Newcomb Communications, Inc. (“Newcomb”). Although no one party currently holds a controlling equity share in Newcomb, Paul Newcomb, the founder of the company, acts as Chairman of the Board for Newcomb and designated three of the five board members. Paul Newcomb is also heavily involved in the day-to-day operations of Newcomb. Therefore, Paul Newcomb effectively holds *de facto* control of Newcomb.

The instant application requests approval for the transfer of control of OuterLink to MB Growth Partners II, L.P. (“MB Growth”), a Delaware partnership that is affiliated with MerchantBanc, LLC. MB Growth currently holds a 19% minority share in Newcomb, Outerlink’s parent company. Following the transfer of control, MB Growth will still hold a 19% equity share in Newcomb. MB Growth, however, will have *de facto* control over Newcomb. MB Growth will have the right to appoint three of the five members of the Board of Directors. MB Growth will also hold veto control over numerous major actions of Newcomb. Finally, MB Growth holds a convertible promissory note that would permit MB Growth to increase its equity holdings in Newcomb to 45%. The contact information for MB Growth is:

MB Growth Partners II, L.P.
c/o MerchantBanc
66 Hanover Street, Suite 303
Manchester, NH 03101
Attention: Jeffrey M. Pollock
FRN: 0016770554

The general partner of MB Growth is MB Venture Management II, LLC (“MB Venture”). MB Venture holds a 1.28% interest in MB Growth. The contact information for MB Venture is:

MB Venture Management II, LLC
c/o MerchantBanc
66 Hanover Street, Suite 303
Manchester, NH 03101
Attention: Jeffrey M. Pollock

The limited partners in MB Growth have no management or operational role in MB Growth. Two limited partners hold ten percent or more of the interests in MB Growth – Paul Funk (12.76%) and Frank V. Sica (12.76%). Their contact information is as follows:

Paul Funk
43 Linnaean St.
Cambridge, MA 02138

Frank V. Sica
3 Westway
Bronxville, NY 10708

MB Venture is a Delaware corporation. Individuals and entities holding ten percent or more of the equity in MB Venture include Frank Pinto (37.5%), Jeffrey M. Pollock (25%) and MerchantBanc, LLC (25%). MB venture has two Managing Members, Jeffrey Pollock and William E. Wetzel, Jr., each of whom hold 50% voting authority and therefore each has negative control of MB Venture. Wetzel's member interests in MB Venture are less than 10%. The contact information for these individuals (all of whom are U.S. citizens) and entities is as follows:

Jeffrey M. Pollock
1444 Union Street
Manchester, NH 03104

William E. Wetzel, Jr.
145 Chase Way
Manchester, NH 03104

Frank Pinto
23 Alba Rd
Wellesley, MA 02481

MerchantBanc, LLC
66 Hanover Street, Suite 303
Manchester, NH 03104

MerchantBanc is chartered as a limited purpose trust company in New Hampshire. Individuals and entities that hold attributable shares of the equity or voting rights of MerchantBanc include James E. Mann (47% voting/46% equity) and Jeffrey Pollock (14% voting/11% equity). The contact information for Mann (who is a U.S. citizen) is as follows:

James E. Mann
10 Old Road Lane
Mount Kisco, NY 10549

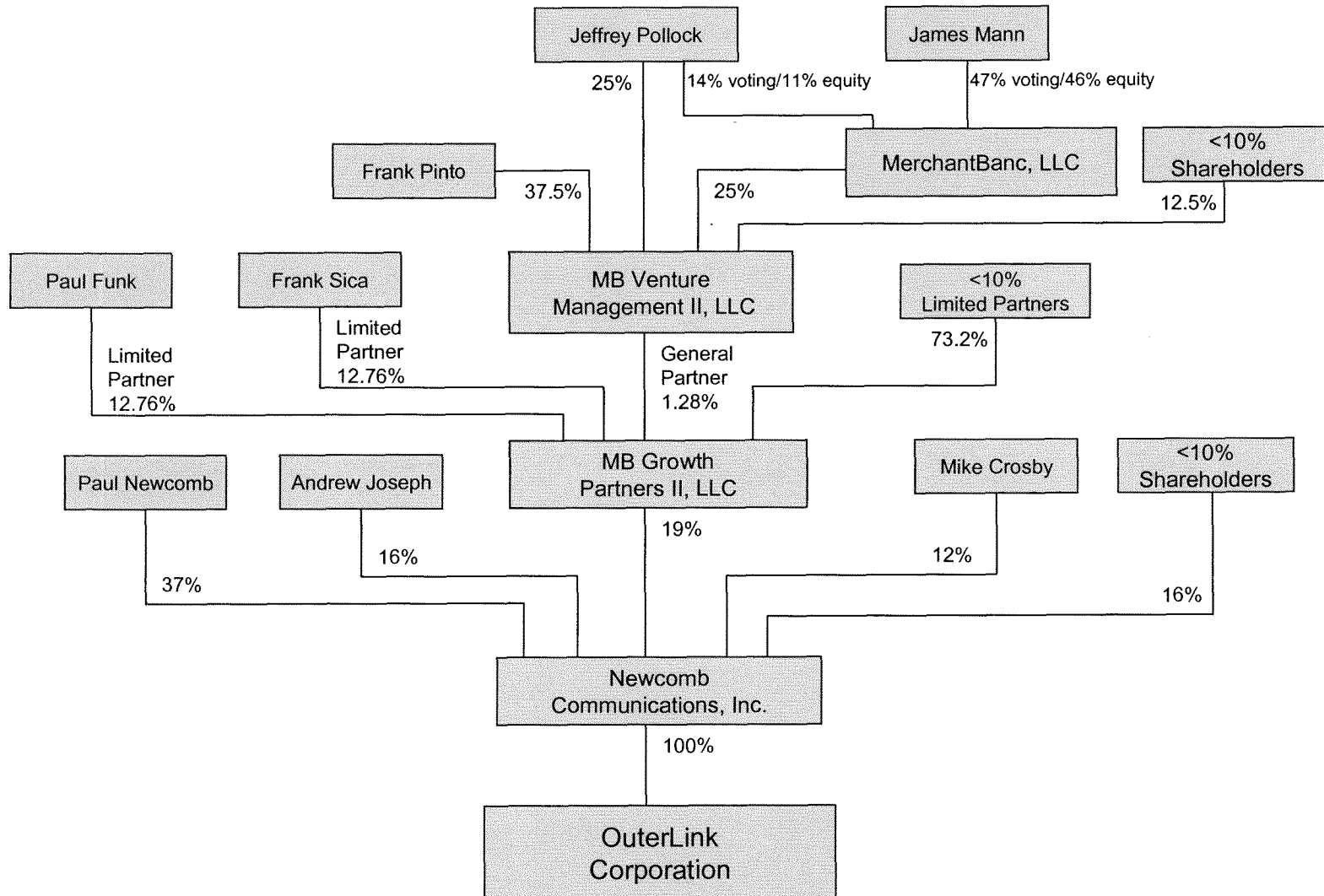
Each of the equity interests described above are illustrated in the accompanying chart.

Public Interest Showing

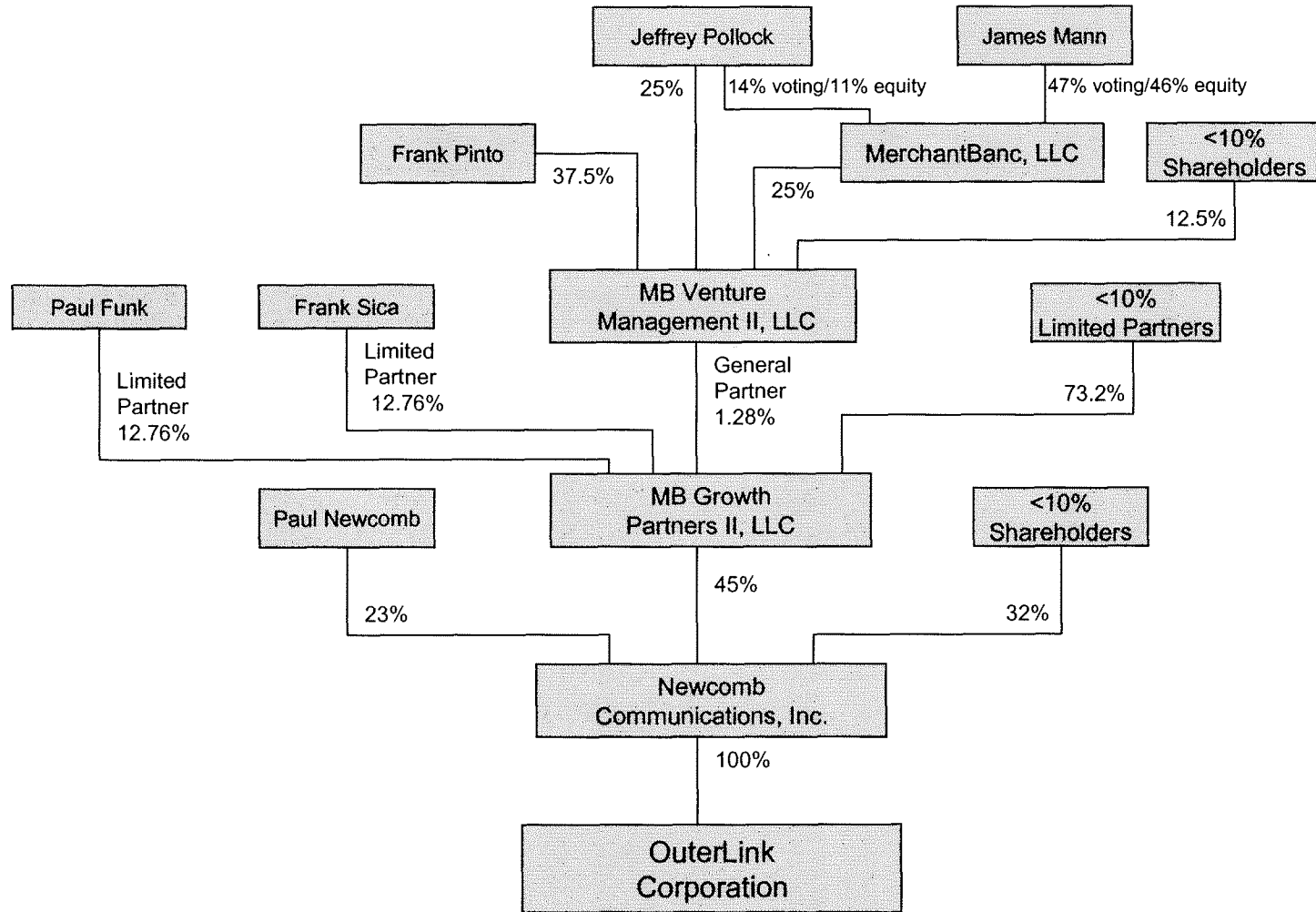
The proposed transaction has the opportunity to result in substantial public interest benefits by providing a new source of funding to OuterLink in order to expand its service offerings. OuterLink to provide satellite-based asset tracking services to support public safety, emergency response and other critically important services. OuterLink's technology has been used to support and protect important public safety equipment, such as U.S. border patrol aircraft, ambulance helicopters and utility trucks involved in emergency power restoration. In this period of intense homeland security efforts, OuterLink's services are in even greater demand than ever. Therefore, FCC approval to transfer control of OuterLink will enable the company to make its services available to additional commercial and government customers in the United States.

OuterLink

Pre-Transfer of Control



OuterLink Post-Transfer of Control *



* Assumes convertible note exercised by MB Growth Partners II, LLC