



# PUBLIC NOTICE

FEDERAL COMMUNICATIONS COMMISSION  
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WASHINGTON D.C. 20554

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**Report No. TEL-01439NS**

**Wednesday June 30, 2010**

**NON STREAMLINED INTERNATIONAL APPLICATIONS/PETITIONS ACCEPTED FOR FILING  
Section 214 Applications (47 C.F.R. § 63.18); Authorize Switched Services over Private Lines (47 C.F.R. § 63.16)  
and Section 310(b)(4)**

Unless otherwise specified, the following procedures apply to the applications listed below:

The applications listed below have been found, upon initial review, to be acceptable for filing. These applications are not subject to the streamlined processing procedures set forth in Section 63.12 of the Commission's rules, 47 C.F.R. § 63.12. These applications shall not be deemed granted until the Commission affirmatively acts upon the application, either by public notice or by written order. Operation for which authorization is sought may not commence except in accordance with any terms or conditions imposed by the Commission.

Unless otherwise specified, interested parties may file comments with respect to these applications within 28 days of the date of this public notice. We request that such comments refer to the application file number shown below. No application listed below shall be granted by the Commission earlier than the day after the date specified in this public notice for the filing of comments.

Unless otherwise specified, ex parte communications between outside parties and Commission staff concerning these applications are permitted subject to the Commission's rules for "permit-but-disclose proceedings." See 47 C.F.R. § 1.1206.

Copies of all applications listed here are available for public inspection in the FCC Reference and Information Center, located in room CY-A257 at the Portals 2 building, 445 12th Street SW, Washington DC 20554. The center can be contacted at (202) 418-0270. People with Disabilities: To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to [fcc504@fcc.gov](mailto:fcc504@fcc.gov) or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (voice), 202-418-0432 (tty). All applications listed are subject to further consideration and review, and may be returned and/or dismissed if not found to be in accordance with the Commission's rules, regulations, and other requirements.

## Petition for Declaratory Ruling

Stratos Offshore Services Company (Stratos Offshore or "Petitioner") requests a foreign ownership ruling, pursuant to section 310(b)(4) of the Communications Act of 1934, as amended, 47 U.S.C. § 310(b)(4), in connection with a planned pro forma reorganization of its direct and indirect parent companies. Specifically, Petitioner requests that the Commission confirm that its prior approval of the indirect foreign ownership of Stratos Offshore by Inmarsat plc (its ultimate parent company) applies to the ownership structure of Stratos Offshore after consummation of the pro forma reorganization or, to the extent necessary, approve its post-consummation foreign ownership pursuant to section 310(b)(4). Petitioner notes that the Commission previously granted a declaratory ruling approving the 100% indirect foreign ownership of Stratos Offshore by Inmarsat plc and intermediate subsidiaries. See Robert M. Franklin, Transferor, Inmarsat plc, Transferee, Consolidated Application for Consent to Transfer of Control of Stratos Global Corporation and its Subsidiaries from an Irrevocable Trust to Inmarsat plc, IB Docket No. 08-143, Memorandum Opinion and Order and Declaratory Ruling, DA 09-117, 24 FCC Rcd 449 (IB 2009), application for review pending.

Stratos Offshore, a Delaware corporation, is a wholly-owned subsidiary of Stratos Holdings, Inc. (Stratos Holdings), also a Delaware corporation. Stratos Holdings is ultimately wholly owned by Inmarsat plc through named intermediate subsidiaries which are organized under the laws of Canada and the United Kingdom, both of which are World Trade Organization ("WTO") Member countries. Inmarsat plc is a widely-held, publicly traded company organized under the laws of the United Kingdom.

Petitioner states that the pro forma reorganization will involve the insertion of additional U.S.- and foreign-organized intermediate entities into the ownership chain between Stratos Holdings and Inmarsat plc. The foreign intermediate entities are all organized in the United Kingdom and ultimately wholly owned by Inmarsat plc. Upon completion of the reorganization, common shares of Stratos Holdings will be held by Inmarsat Group Holdings Inc. (80%) and its wholly-owned subsidiary, Inmarsat US Services LLC (20%), both of which are organized in Delaware. Stratos Holdings will also issue preferred shares to Inmarsat US Investments Limited, which is a wholly-owned U.K. subsidiary of Inmarsat US Services LLC. Inmarsat Group Holdings Inc. will be directly and indirectly wholly owned by CIP UK Holdings Limited and Inmarsat Finance III Limited (Finance III), respectively, each of which is organized in the United Kingdom and resides currently in the ownership chain between Stratos Holdings and Inmarsat plc. Inmarsat plc will "drop down" its current 100% direct ownership interest in Finance III as part of the reorganization, such that Inmarsat plc will hold its interest in Finance III indirectly through Inmarsat Holding Ltd, Inmarsat Group Ltd, Inmarsat Investments Ltd and Inmarsat Ventures Ltd, all of which are organized in the United Kingdom.

Petitioner asserts that, pursuant to the rules and policies established in the Commission's Foreign Participation Order, 12 FCC Rcd 23891 (1997), Order on Reconsideration, 15 FCC Rcd 18158 (2000), the proposed changes to the indirect foreign ownership of Stratos Offshore in excess of the 25 percent benchmark in section 310(b)(4) are consistent with the public interest.

Petitioner acknowledges that grant of the Petition may be conditioned on Inmarsat plc's compliance with the Network Security Agreement between Inmarsat plc, Stratos Global Corp. (Stratos Global), the Department of Justice (DOJ) and the Federal Bureau of Investigation (FBI), dated September 23, 2008, and continued compliance of Stratos Global with the Network Security Agreement between Stratos Global, DOJ, FBI and the Department of Homeland Security, dated August 7, 2001 and Amendment No. 1 to that agreement, dated August 14, 2007. A copy of the Network Security Agreements and Amendment No. 1 are publicly available at 24 FCC Rcd 449, 489 (Appendix B).

Interested parties may file comments on or before July 14, 2010, and replies to comments may be filed on or before July 21, 2010.

## Petition for Declaratory Ruling

Stratos Communications, Inc. (SCI or "Petitioner") requests a foreign ownership ruling, pursuant to section 310(b)(4) of the Communications Act of 1934, as amended, 47 U.S.C. § 310(b)(4), in connection with a planned pro forma reorganization of its direct and indirect parent companies. Specifically, Petitioner requests that the Commission confirm that its prior approval of the indirect foreign ownership of SCI by Inmarsat plc (its ultimate parent company) applies to the ownership structure of SCI after consummation of the pro forma reorganization or, to the extent necessary, approve its post-consummation foreign ownership pursuant to section 310(b)(4). Petitioner notes that the Commission previously granted a declaratory ruling approving the 100% indirect foreign ownership of SCI by Inmarsat plc and intermediate subsidiaries. See Robert M. Franklin, Transferor, Inmarsat plc, Transferee, Consolidated Application for Consent to Transfer of Control of Stratos Global Corporation and its Subsidiaries from an Irrevocable Trust to Inmarsat plc, IB Docket No. 08-143, Memorandum Opinion and Order and Declaratory Ruling, DA 09-117, 24 FCC Rcd 449 (IB 2009), application for review pending.

SCI, a Delaware corporation, is a wholly-owned subsidiary of Stratos Holdings, Inc. (Stratos Holdings), also a Delaware corporation. Stratos Holdings is ultimately wholly owned by Inmarsat plc through named intermediate subsidiaries which are organized under the laws of Canada and the United Kingdom, both of which are World Trade Organization ("WTO") Member countries. Inmarsat plc is a widely-held, publicly traded company organized under the laws of the United Kingdom.

Petitioner states that the pro forma reorganization will involve the insertion of additional U.S.- and foreign-organized intermediate entities into the ownership chain between Stratos Holdings and Inmarsat plc. The foreign intermediate entities are all organized in the United Kingdom and ultimately wholly owned by Inmarsat plc. Upon completion of the reorganization, common shares of Stratos Holdings will be held by Inmarsat Group Holdings Inc. (80%) and its wholly-owned subsidiary, Inmarsat US Services LLC (20%), both of which are organized in Delaware. Stratos Holdings will also issue preferred shares to Inmarsat US Investments Limited, which is a wholly-owned U.K. subsidiary of Inmarsat US Services LLC. Inmarsat Group Holdings Inc. will be directly and indirectly wholly owned by CIP UK Holdings Limited and Inmarsat Finance III Limited (Finance III), respectively, each of which is organized in the United Kingdom and resides currently in the ownership chain between Stratos Holdings and Inmarsat plc. Inmarsat plc will "drop down" its current 100% direct ownership interest in Finance III as part of the reorganization, such that Inmarsat plc will hold its interest in Finance III indirectly through Inmarsat Holding Ltd, Inmarsat Group Ltd, Inmarsat Investments Ltd and Inmarsat Ventures Ltd, all of which are organized in the United Kingdom.

Petitioner asserts that, pursuant to the rules and policies established in the Commission's Foreign Participation Order, 12 FCC Rcd 23891 (1997), Order on Reconsideration, 15 FCC Rcd 18158 (2000), the proposed changes to the indirect foreign ownership of SCI in excess of the 25 percent benchmark in section 310(b)(4) are consistent with the public interest.

Petitioner acknowledges that grant of the Petition may be conditioned on Inmarsat plc's compliance with the Network Security Agreement between Inmarsat plc, Stratos Global Corp. (Stratos Global), the Department of Justice (DOJ) and the Federal Bureau of Investigation (FBI), dated September 23, 2008, and continued compliance of Stratos Global with the Network Security Agreement between Stratos Global, DOJ, FBI and the Department of Homeland Security, dated August 7, 2001 and Amendment No. 1 to that agreement, dated August 14, 2007. A copy of the Network Security Agreements and Amendment No. 1 are publicly available at 24 FCC Rcd 449, 489 (Appendix B).

Interested parties may file comments on or before July 14, 2010, and replies to comments may be filed on or before July 21, 2010.

## International Telecommunications Certificate

**Service(s):** Global or Limited Global Facilities-Based Service, Global or Limited Global Resale Service

Application for authority to provide facilities-based service in accordance with section 63.18(e)(1) of the Commission's rules, and also to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(1), (2).

## REMINDER:

Applicants must certify that neither the applicant nor any party to the application is subject to a denial of federal benefits by federal and/or state courts under authority granted in 21 U.S.C. § 862. See 47 C.F.R. §§ 1.2001–2003.

An updated version of Section 63.09-.25 of the rules, and other related sections, is available at <http://www.fcc.gov/ib/pd/pf/telecomrules.html>