

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	WC Docket No. 07-73
)	DA 07-2257
Stratos Global Corporation, Transferor)	
)	File Nos.
Robert M. Franklin, Transferee)	ITC-T/C-20070405-00133
)	ITC-T/C-20070405-00135
Transfer of Control of)	ITC-T/C-20070405-00136
Stratos Global Corporation's)	SES-T/C-20070404-00440
FCC-Authorized Subsidiaries)	through -00443
)	0002961737 and
)	ISP-PDR-20070405-0006
)	
)	

**PETITION TO ADOPT CONDITIONS TO
AUTHORIZATIONS AND LICENSES**

The Department of Justice (“DOJ”), including the Federal Bureau of Investigation (“FBI”), and Department of Homeland Security (“DHS”), (collectively, the “Agencies”), submit this Petition to Adopt Conditions to Authorizations and Licenses (“Petition”), pursuant to Section 1.41 of the Federal Communications Commission (“FCC” or “Commission”) rules.¹ Through this Petition, the Agencies advise the Commission that they have no objection to the Commission approving the transfers sought in the above-referenced proceeding, provided that the Commission conditions its approval on the agreement of Stratos Global Corporation and other Stratos entities (collectively “Stratos”), Robert M. Franklin, and CIP Canada Investment, Inc., to abide by the commitments and undertakings set forth in the Amendment No. 1 (“Amendment”) to the August 7, 2001 Agreement between Stratos and the Department of Justice and FBI (“August 2001 Agreement”), both of which are attached hereto.

¹ 47 C.F.R. § 1.41.

In the above-captioned proceedings, the applicants have petitioned the Commission, among other things, for consent to transfer control of authorizations under Section 214 of the Communications Act of 1934, as amended, currently held by Stratos Global Corporation and its subsidiaries, to Robert M. Franklin, trustee.

The Commission has long recognized that law enforcement, national security and public safety concerns are part of its public interest analysis, and has accorded deference to the views of other U.S. government agencies with expertise in those areas. *See In the Matter of Comsat Corporation d/b/a Comsat Mobile Communications, etc.*, 16 FCC Rcd. 21,661, 21707 ¶¶ 94 (2001). In regard to Stratos, the Commission has already considered and granted an earlier “Petition to Adopt Conditions” filed on August 9, 2001 by the Department of Justice and FBI, seeking to condition the authorizations and licenses granted to Stratos in that proceeding upon compliance with the August 2001 Agreement. *See id. at 21714* ¶ 122. The Amendment reaffirms the August 2001 Agreement, specifies new parties including but not limited to DHS, and specifies new commitments, including among other things, a commitment by the transferee not to interfere with or impede Stratos’ continued adherence to the August 2001 Agreement and the updated implementation plan.

After discussions with representatives of the applicants in connection with the transfer request, the Agencies have concluded that the additional commitments set forth in the Amendment will continue to help ensure that the Agencies and other entities with responsibility for enforcing the law, protecting the national security, and preserving public safety can proceed appropriately to satisfy those responsibilities. Accordingly, the Agencies advise the Commission that they have no objection on those grounds to the Commission granting the above-referenced requests for transfer of control provided that the Commission conditions its consent on

compliance by Stratos with the commitments set forth in the Amendment.

The Agencies are authorized to state that the Applicants do not object to the grant of this Petition to Adopt Conditions.

Respectfully submitted,

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