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FILED ELECTRONICALLY WITH ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

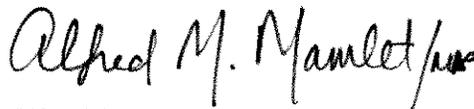
**Re: In the Matter of Stratos Global Corporation and Robert M. Franklin, Trustee
WC Docket No. 07-73, DA 07-2257**

Dear Ms. Dortch:

On September 12, 2007, the staff of the International Bureau ("Bureau") requested additional information ("Questions for Applicants") concerning the above-referenced application of Stratos Global Corporation ("Stratos") and Trustee Robert M. Franklin for FCC consent to the indirect transfer of control of Stratos' wholly-owned FCC authorized subsidiaries from Stratos Global to an irrevocable trust. See Email from James M. Ball, Chief Policy Division of the International Bureau to Alfred M. Mamlet (Sept. 12, 2007).

Attached please find the response to the Bureau's Questions for Applicants. If you have any questions concerning this submission, please let me know.

Respectfully submitted,



Alfred M. Mamlet

Counsel for Stratos Global Corporation

Attachment (Answers to Questions for Applicants)

cc: Attached Certificate of Service

Stratos Global Corp and Robert M. Franklin, Trustee
WC Docket No. 07-73

Answers to Questions for Applicants

Question 1. On page seven of the Narrative, Applicants state: “The loan facility is a ten year term loan with an interest rate of 5.75% through December 31, 2010 and 11.5% thereafter (interest is on a “paid in kind basis” until April 14, 2009).” Please explain what you mean by the term “paid in kind.”

Answer : The term ‘paid in kind’ or ‘PIK’ means that instead of interest accruing and being paid in cash, the accrued interest is added to the principal amount of the loan and will itself bear interest in the next interest period. Therefore, until April 14, 2009, CIP UK Limited will not be required to fund any cash interest payments and interest at the rate of 5.75% will instead accrue and be added to the loan principal through this period.

Question 2. Please state what you anticipate will be the capitalization of each of Communications Investment Partners Limited (CIP), CIP UK Holdings Ltd, and CIP Canada Investment Inc. assuming a full drawdown by CIP UK Holdings under the loan facility agreement with Inmarsat Finance III Limited. Please also state the anticipated capitalization of the companies, after a full drawdown of the loan facility as aforesaid, on a consolidated basis.

Answer: The equity capitalization of Communication Investment Partners Limited (CIP) is anticipated to be approximately US\$50,000, with no debt, other than normal trade payables.

The equity capitalization of CIP UK Holdings Ltd. (CIP UK) is anticipated to be £1,000 (approximately US\$2,000). CIP UK will borrow US\$275 million from Inmarsat Finance and capitalize CIP Canada with these proceeds.

With respect to CIP Canada Investment Inc. (CIP Canada), we anticipate that this entity will have approximately US\$275 million of equity, and no debt, other than normal trade payables, if any.

The net debt capitalization of the CIP Group (CIP, CIP UK and CIP Canada), on a pro-forma consolidated basis, is expected to be approximately US\$275 million with equity capitalization of approximately US\$50,000.

Question 3. Please state what you anticipate will be the debt/equity ratio of each of CIP, CIP UK Holdings Ltd, and CIP Canada Investment Inc. assuming a full drawdown by CIP UK Holdings under the loan facility agreement with Inmarsat Finance III Limited. Please also state the anticipated debt/equity ratio of the companies, after a full drawdown of the loan facility as aforesaid, on a consolidated basis.

Answer: Given CIP and CIP Canada will have little, if any external debt, the debt to equity ratio of each is expected to be less than 1 to 1 .

The debt to equity ratio of CIP UK is expected to be approximately 137 thousand to one.

The debt to equity ratio of the CIP Group (on a pro-forma consolidated basis) is expected to be approximately 5 thousand to 1.

Question 4. According to section 4 (b) of the Trust Agreement:

Trustee shall cause any director appointed or elected by it in accordance with this Agreement to execute and deliver to Trustee an agreement, in form and substance acceptable to Trustee, pursuant to which such director agrees that the director will not communicate with Bidco or Inmarsat or their respective officers, directors, employees, stockholders and Affiliates regarding the Company, including the operations or management of Company; provided that any officer of the Company who is also a director may communicate with Inmarsat and its officers, employees and Affiliates regarding commercial matters in the ordinary course of business between the Company and Inmarsat and their respective Affiliates.

Please explain what you mean by communications in the “ordinary course of business” as the phrase is used in this section. What are the type of regular communications between satellite operator and major distributor to which you refer on page three of your September 6, 2007 *ex parte* filing?

Answer: The Trust Agreement contains two constraints on communications between Stratos or the Trustee, on the one hand, and CIP and Inmarsat, on the other hand. Section 10 prohibits *any* communications between Inmarsat or CIP and the Trustee "regarding the operation or management" of Stratos. Section 4(b) goes a step further, and obligates the Trustee to cause the directors he appoints or elects to agree in writing not to communicate with CIP or Inmarsat regarding Stratos, including the "operations or management" of Stratos. The one exception to this prohibition is for an officer of Stratos who is also a director. That exception applies to only one Stratos director, Jim Parm, who also is the Stratos CEO. This exception allows Mr. Parm to communicate with Inmarsat regarding "commercial matters in the ordinary course of business" between Inmarsat and Stratos. That exception was intended to allow Mr. Parm to continue his practice of communicating with one of Stratos' major suppliers about normal commercial issues.

The term "ordinary course of business" means the normal commercial activities between Stratos and Inmarsat that they have regularly discussed for the last several years and would continue to discuss, regardless of the proposed transaction. Stratos is one of Inmarsat's largest distributors and Inmarsat is one of Stratos' largest suppliers. Accordingly, Stratos and Inmarsat personnel in many departments communicate regularly on a wide variety of matters including:

- **Network operations** – For the “Existing & Evolved” Inmarsat services, Inmarsat operates the satellite portion of the network that provides services to end-users while Stratos is one of the principal operators of the terrestrial portion of the network, with 4 land earth stations (“LESS”). For the “next

generation” services like Broadband Global Network (“BGAN”), Inmarsat owns both the satellites and the LESs (with operation of one of the LESs contracted out to Stratos), and interconnects with Stratos, which provides value-added services to its customers. In addition, Stratos provides telemetry, tracking and control (“TT&C”) services for the Inmarsat satellites. Operational personnel from Inmarsat and Stratos communicate on a broad range of issues such as operations of the satellite that impact the LES portion of the network, operations of the LESs that impact the satellite portion of the network, maintenance schedules, quality improvement, introduction of new services, customer support, operation of the “next generation” LES owned by Inmarsat and operated by Stratos, and TT&C.

- **Sales and Marketing** – The respective Inmarsat and Stratos sales and marketing departments work together to sell services. They promote the Stratos distribution of Inmarsat services by discussing a range of subjects such as marketing programs and initiatives, development and deployment of new services, joint marketing efforts and value-added services.
- **Finance** – Since they have a major supplier-vendor relationship, Inmarsat and Stratos financial personnel deal with each other regularly on billing, accounting, financial reporting and related financial issues.
- **Legal and Regulatory** – Inmarsat and Stratos have a number of legal agreements governing their commercial relationships. Their respective legal departments discuss issues arising under existing contracts, as well as negotiate agreements for new services. Inmarsat and Stratos also cooperate on regulatory issues related to obtaining licenses for BGAN and other services in the U.S. and in dozens of other countries.

Inmarsat also discusses most of these same issues with its other major distributors. Stratos discusses most of these same issues with its other major suppliers of satellite services.

The “ordinary course of business” discussions between Stratos and Inmarsat occur in various departments and at different levels of seniority within these departments. The Stratos CEO engages personally in discussions with Inmarsat on the issues of greatest importance, often if they have not been resolved by others.

CERTIFICATE OF SERVICE

I, Marc Paul, an attorney with the law firm of Steptoe & Johnson LLP, hereby certify that on this 18th day of September 2007, I served a true copy of the foregoing Cover Letter and Answers to Questions for Applicants by first class mail, postage pre-paid (or as otherwise indicated) upon the following:

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