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October 16, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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

Response to Questions Concerning the Ownership of Stock in Inmarsat plc

Dear Ms. Dortch:

This letter is submitted on behalf of Inmarsat Finance III Limited (“Inmarsat Finance”) in response to the International Bureau’s questions of October 10, 2007 regarding ownership of shares of Inmarsat plc.

I. BACKGROUND AND SUMMARY

Inmarsat plc is a public limited company quoted on the London Stock Exchange (LSE: ISAT). Inmarsat plc has one class of voting shares – ordinary shares of €0.0005 each with one vote per share, 457,486,883 of which are issued and outstanding. There are currently over 2,300 registered shareholders of Inmarsat plc.

The largest shareholder of Inmarsat plc currently owns less than 6%, 22 other shareholders own between 1% and 5%, and each of the remaining shareholders owns less than 1%. Approximately 88% of the Inmarsat plc shares are beneficially owned by U.S. or other WTO-based companies or by senior Inmarsat plc management. To Inmarsat plc’s knowledge, approximately an additional 1% of its shares are owned by entities from non-WTO-member countries. Inmarsat plc does not in most cases know the principal place of business of beneficial owners who own less than 100,000 shares each, because, as described below, that level of holdings is outside the scope of the ownership surveys that Inmarsat plc regularly conducts. In the aggregate, holdings where ownership information is determined comprise approximately 89%, and where ownership information is not available comprise approximately 11%, of Inmarsat plc’s shares.

In many instances, Inmarsat plc shares are managed by a different entity than the beneficial owner, with the investment manager typically exercising the voting power. Certain managers hold the voting power represented by the shares of multiple beneficial owners. Four entities, all from the United Kingdom, manage aggregate Inmarsat plc shareholdings in excess of 5%. Eighteen entities manage shareholdings of between 1% and 5%, and the other entities each manage less than 1%. In certain cases in which the beneficial owner is known, either it is not certain whether that beneficial owner relies on a manager, or Inmarsat plc does not have complete information about the manager. In the aggregate, those circumstances exist for approximately 2% of Inmarsat plc's shares.

In the ordinary course of business, Inmarsat plc periodically has JPMorganCazenove Limited ("Cazenove") survey the Inmarsat plc shareholders that own 100,000 or more shares. Share analyses of shareholdings of 100,000 or less each represent only approximately 0.02% of the issued and outstanding shares, which is de minimis for review purposes. The most recent survey was conducted in September 2007, and forms the basis for the answers provided below.

Cazenove reviews raw shareholder data maintained by the Inmarsat plc share Registrars and classifies this data by known shareholding names. Cazenove also investigates shareholdings to identify, where possible, the underlying beneficial ownership. In accordance with the UK Companies Act (which governs Inmarsat plc), this investigation typically involves writing to the named shareholder requesting that they provide the relevant information relating to the underlying ownership. Cazenove also takes steps to determine the country of domicile for Inmarsat plc's shareholders and any third parties that manage those shareholdings. Consistent with the Commission's "principal place of business" test, in determining the "domicile" of an entity, Cazenove conducts research to look beyond the street address associated with the shares. Among other things, Cazenove looks to available information such as: investment purpose, country of organization, location of headquarters, and country from which the funds being managed were contributed.

Cazenove does not analyze holdings of private individuals. However, data maintained by the share Registrars indicates that a small percentage (approximately 0.37%) of Inmarsat plc shares is owned by individuals, other than Inmarsat management, whose citizenship is not known. The vast majority of these individuals each owns less than 0.01%. Certain members of Inmarsat plc's senior management who are citizens of the United States or other WTO-member countries own in the aggregate approximately 1.48%.

II. RESPONSE TO SPECIFIC QUESTIONS

The following section answers each of the Commission's specific questions. All percentages listed below are approximate, and derived as described above.

(1) Please provide the following information regarding Inmarsat plc.:

(a) The aggregate percentage of total equity and voting stock held by or on behalf of individuals that are citizens of the United States;

Except as noted below, approximately 0.02% of shares are owned by individuals whose citizenship has not been ascertained, but whose shares are registered in their names to United States addresses. Cazenove has not investigated whether additional shareholdings may be held by individuals through a street name.

(b) The aggregate percentage of total equity and voting stock held by or on behalf of individuals that are citizens of foreign countries; and

Except as noted below, approximately 0.35% of shares are owned by individuals whose citizenship has not been ascertained, but whose shares are registered in their names to non-U.S. addresses. Cazenove has not investigated whether additional shareholdings may be held by individuals through a street name.

Certain individuals in Inmarsat plc senior management, who are citizens of the United States or other WTO-member countries own, in the aggregate, approximately 1.48% of Inmarsat plc shares.

(c) A list of the countries of citizenship for the beneficial owners of the stock, including for any individual that holds the right to vote the stock. If any of these countries are non-WTO countries, please note the aggregate percentage of total equity and voting stock attributable to the non-WTO investment for each non-WTO country.

See information provided above in response to questions 1(a) and 1(b). The citizenship of individual shareholders is generally not known, other than those individual shareholders in Inmarsat plc management, who are citizens of the United States or other WTO-member countries.

(d) The aggregate percentage of total equity and voting stock held by banks, insurance companies, pension plans and foundations/endowments organized in the United States and controlled by U.S. citizens;

Banks, insurance companies, pension plans and foundations/endowments (including holdings by analogous entities such as custodians, market makers and charities) organized in the United States and controlled by U.S. entities or individuals own approximately 0.24% of Inmarsat plc shares, and therefore own the same percent of total equity and voting stock. In addition, with respect to approximately 0.15% of the shareholdings of such U.S. beneficial owners, it is unknown whether the beneficial owner relies on a manager. Otherwise, with regard to the foregoing, all entities that manage U.S. shareholdings are U.S. domiciled.

(e) The aggregate percentage of total equity and voting stock held by banks, insurance companies, pension plans and foundations/endowments controlled by foreign citizens or organized in foreign countries; and

Banks, insurance companies, pension plans and foundations/endowments (including holdings by analogous entities such as custodians, market makers and charities) organized in foreign countries or controlled by foreign individuals or entities own approximately 29% of Inmarsat plc shares, and therefore own the same percent of total equity and voting stock. See answer to question 1(f), below, for further clarification regarding management of shares.

(f) A list of the countries included in category (e) above. If any of these countries are non-WTO countries, please note the aggregate percentage of equity and voting stock attributable to the non-WTO investment for each non-WTO country.

Australia, Bermuda, Canada, Channel Islands, Denmark, Finland, France, Germany, Hong Kong, Ireland, Isle Of Man, Italy, Japan, Luxembourg, Netherlands, Scotland, South Africa, Spain, Switzerland and United Kingdom.

Approximately 1.6% of the foreign beneficial owners' shares listed above are managed by an entity domiciled in a different country. In each such case, the manager is domiciled in one of the WTO countries listed above. In addition, with respect to approximately 1.7% of the shareholdings of foreign beneficial owners, it is unknown whether the beneficial owner relies on a manager or there is not complete information regarding the manager.

(g) The aggregate percentage of total equity and voting stock held by private equity funds and management investment companies (i.e., closed end funds and mutual funds) investing in Inmarsat plc that are organized in the United States and that have their principal places of business in the United States. In making a principal place of business determination, Inmarsat plc should include in its determination for each investing entity its world headquarters; tax jurisdiction; and the citizenship or principal place of business of its controlling principals, directors and/or investment managers.

The aggregate percentage of Inmarsat plc shares, and therefore the total equity and voting stock owned by private equity funds and management investment companies (including holdings by analogous entities such as hedge funds and unit trusts) investing in Inmarsat plc that are organized in the United States and that have their principal places of business in the United States is approximately 4%.

(h) The aggregate percentage of total equity and voting stock held by private equity funds and management investment companies (i.e., closed end funds and mutual funds) investing in Inmarsat plc that are organized in a foreign country or that have their principal places of business in a foreign country; and

The aggregate percentage of Inmarsat plc shares, and therefore the total equity and voting stock owned by private equity funds and management investment companies (including holdings by analogous entities such as hedge funds and unit trusts) investing in Inmarsat plc that are organized in a foreign country or that have their principal places of business in a foreign country is approximately 47%.

See answer to question 1(i), below, for further clarification regarding management of shares.

- (i) *For the investors in Category (h) above, a list of the countries where the investors are organized and where they have their principal places of business. If any of these countries are non-WTO countries, please note the aggregate percentage of total equity and voting stock attributable to the non-WTO investment for each non-WTO country. In making a principal place of business determination, Inmarsat plc should include in its determination for each investor its world headquarters; tax jurisdiction; and the citizenship or principal place of business of its controlling principals, directors and/or investment managers.*

Belgium, Channel Islands, Hong Kong, Ireland, Isle Of Man, Italy, Japan, Luxembourg, Scotland, Singapore, United Arab Emirates and United Kingdom.

Of the foregoing interests, approximately 3.4% of foreign beneficial owners' shares are managed by an entity domiciled in a different country. In each such case, the manager is domiciled in another WTO-member country listed above. In addition, with respect to approximately 0.55% of the shareholdings of foreign beneficial owners, it is unknown whether the beneficial owner relies on a manager or there is not complete information regarding the manager.

- (j) *In making the principal place of business determination for the management investment companies, please confirm that Inmarsat plc relied upon the factors listed above in making its determination (i.e., world headquarters; tax jurisdiction; and the citizenship or principal place of business of its controlling principals, directors and/or investment managers). If Inmarsat plc used different criteria, please list the factors it considered in making its principal place of business determinations.*

See Section I, above, for a description of criteria used to determine the principal place of business for Inmarsat plc shareholders.

- (2) *For investors in Inmarsat plc other than those covered by the questions above (i.e., individuals, banks, insurance companies, pension plans, foundations/endowments, private equity funds and mutual funds), please explain the nature of these investing entities and:*

- (a) *The aggregate percentage of total equity and voting stock for such investors that are organized in the United States and that have their principal places of business in the United States. For purposes of determining the investors' principal places of business, please use the five factor test specified in the Foreign Carrier Entry Order, 11 FCC Rcd 3873, 3951, ¶ 207 (1995). See also Foreign Ownership Guidelines, 19 FCC Rcd 22612, 22623 (2004).*

To the best of Inmarsat plc's knowledge, none of its shares are owned by investors not covered above, that are both organized in the United States and have their principal places of business in the United States.

(b) The aggregate percentage of total equity and voting stock for such investors that are organized in a foreign country or that have their principal places of business in a foreign country.

Approximately 7% of Inmarsat plc shares are owned by investors not covered above that are organized in a foreign country or have their principal places of business in a foreign country.

(c) For the investors in Category (b) above, a list of the countries where the investors are organized and where they have their principal places of business. If any of these countries are non-WTO countries, please note the aggregate percentage commitment attributable to the non-WTO investment for each non-WTO country.

Bangladesh, China, Gabon, Italy, Japan, Liberia, Libyan Arab Mamahiriya, Russian Federation, and Vietnam.

Of the foregoing interests, the following is the aggregate percentage of equity and voting stock attributable to non-WTO investment: one Liberian investor (0.14%), one Libyan Arab Mamahiriya investor (0.03%), and one Russian Federation investor (1.15%). These are legacy shareholders from the period when Inmarsat plc was an intergovernmental organization and these members then held shares in Inmarsat plc when it became a private company in 1999 and subsequently when it became a quoted company on the London Stock Exchange. These shareholders have not traded any of their original shareholdings to date.

(3) Please provide a “principal place of business” showing for Inmarsat plc, Inmarsat Finance III Limited and any intervening companies between them in their vertical ownership chain.

Inmarsat plc directly owns 100% of the shares of Inmarsat Finance III Limited. For both companies, the world headquarters, tax jurisdiction, and the principal place of business of its directors is in the United Kingdom.

* * * * *

Please let us know if you have any questions.

Sincerely yours,

/s/

John P. Janka
Jeffrey A. Marks

Counsel for Inmarsat Finance III Limited

cc: Helen Domenici (International Bureau)
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