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October 26, 2007

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:

This letter is being submitted on behalf of Stratos Global Corporation ("Stratos Global") to supplement information that has already been provided in the above-referenced matter regarding the principal place of business determination for Stratos Global and one of its subsidiaries.

Specifically, the following information, in accordance with the Commission's prior precedent for determining the principal place of business,¹ is being provided about Stratos Global and its wholly-owned subsidiary Stratos Wireless, Inc. ("Stratos Wireless"): (1) place of incorporation; (2) nationality of investment principals (those entities or individuals having a 10% or greater interest), officers and directors; (3) country in which the headquarters are located; (4) country in which the majority of tangible property is located; and (5) the country from which the company derives the greatest sales and revenues from its operations. As demonstrated below,

¹ See *Foreign Ownership Guidelines for FCC Common Carrier and Aeronautical Radio Licenses*, DA 04-3610 (Nov. 17, 2004) at pp. 11-12. See also *DiGiPH PCS, Inc. and Eliska Wireless Ventures License Subsidiary I, L.L.C.*, Memorandum Opinion and Order, 15 FCC Rcd. 24501, 24506-07 (2000) (citing *Global Crossing Ltd. and Frontier Corporation*, Memorandum Opinion and Order, 14 FCC Rcd. 15911, 15918-19 (1999) and *Rules and Policies on Foreign Participation in the U.S. Telecommunications Market*, 12 FCC Rcd. 23891, 23941 (1997)).

applying the Commission's five factor test, Stratos Wireless and Stratos Global have their principal place of business in Canada or the United States.

Stratos Wireless, Inc.

1. Stratos Wireless is a Canadian corporation.
2. Stratos Wireless is 100% owned by Stratos Global Corporation, a Canadian corporation. All of the officers and directors of Stratos Wireless are either U.S. or Canadian citizens.
3. The world headquarters of Stratos Wireless is located in Canada at the following address:

Stratos Wireless, Inc.
34 Glencoe Drive
Donovan's Industrial Park
Mount Pearl, Newfoundland A1N 4S8
Canada
4. The majority of Stratos Wireless' tangible property is in Canada.
5. Stratos Wireless derives the greatest sales and revenues from its operations in Canada.

Stratos Global Corporation

1. Stratos Global is a Canadian corporation.
2. Stratos Global is publicly-traded on the Toronto Stock Exchange. Stratos Global currently has only two shareholders with more than a 10% ownership of the company. Howson Tattersall Investment Counsel Limited, a Canadian corporation, holds 11.8% of Stratos Global's outstanding common shares. AGF Funds Inc., a Canadian corporation, holds 10.53% of Stratos Global's outstanding common shares. One director of Stratos Global is a U.K. citizen. All of the officers and the remaining directors of Stratos Global are either U.S. or Canadian citizens.
3. The world headquarters of Stratos Global is located in the United States at the following address:

6901 Rockledge Drive
Suite 900
Bethesda, Maryland 20817
4. Stratos Global is a holding company, with the majority of its tangible property in the U.S. and Canada.

CERTIFICATE OF SERVICE

I, Marc Paul, an attorney with the law firm of Steptoe & Johnson LLP, hereby certify that on this 26th day of October 2007, I served a true copy of the foregoing Supplement by first class mail, postage pre-paid (or as otherwise indicated) upon the following:

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