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VIA ELECTRONIC FILING

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

Re: Notice of Ex Parte Presentation
WC Docket No. 07-73

Dear Ms. Dortch:

On November 16, 2007, Eric W. DeSilva and the undersigned of Wiley Rein LLP, counsel for Iridium Satellite LLC ("Iridium"), met with Helen Domenici, Frances Gutierrez, David Strickland, and Arthur Lechtman of the FCC's International Bureau regarding matters at issue in the above-captioned proceeding. At the meeting, Iridium counsel discussed Iridium's concerns regarding the proposed transfer of control of Stratos Global Corp. ("Stratos").

First, Iridium counsel reviewed the new and novel structure presented by the transaction. Specifically, Iridium counsel reviewed information in the record indicating that Communication Investment Partners Limited (individually and collectively with its affiliated companies, "CIP"), the parent of the beneficial owner of the proposed trust that will own Stratos, is proposing to invest only $50,000.00 to purchase a $275M company; will not receive any equity-like returns for owning Stratos; and has a debt-to-equity ratio that is a staggering 137,000:1. In contrast, Inmarsat Finance III Limited ("Inmarsat") – which is not a party to the transfer application – is providing all of the funding for the acquisition of Stratos; is bearing all of the financial risk; is effectively paying CIP and the Trustee for being involved; and has a call that it can exercise to collapse the Trust and obtain direct control of Stratos. Thus, even though Inmarsat is not a party to the transfer application, it will be the entity with control over all monies paid into or out of Stratos, as well as monies paid to CIP and the Trustee for being involved in this transaction.

Second, Iridium counsel also discussed Stratos' position as a major – and independent – distributor of Iridium's satellite service and the services of other competitors to Inmarsat. It was emphasized that the trust arrangement maintains a façade that Stratos remains independent when its management will actually be beholden to – and incentivized to discriminate in favor of – Inmarsat. Specifically, the trust agreement precludes CIP from communicating with the Trustee and Stratos management, and the Trustee has disavowed any intent to manage Stratos. In contrast, the arrangement in no way prohibits communications between Inmarsat and Stratos, and Inmarsat has admitted it will regularly be communicating with Stratos in the ordinary course of business. Further, given the Inmarsat call option, Stratos management will understand that Inmarsat will likely soon be Stratos' direct owner. Self-interest – and the absence of restrictions – will encourage Stratos management to take actions that are not adverse to, and will likely be in favor of, their future owner. Also of concern, the trust arrangement freezes Stratos financially and operationally in a way that will substantially hinder its ability to compete in the dynamic satellite marketplace.

Additionally, Iridium counsel reviewed that the new and novel structure of the transaction would create a new loophole in FCC transaction policy. Grant of the transaction would enable a company who is not an applicant – and thus outside the scope of FCC review of the transaction – to nevertheless gain a significant level of control and influence over an FCC licensee. As such, this transaction cannot be viewed in a vacuum, but must be considered in terms of the new precedent it will set for future transactions. Allowing Inmarsat to create and fund a trust to "park" Stratos for future acquisition could similarly enable other companies prohibited from owning FCC licensees by private contractual agreement, FCC regulation or the Communications Act to create a trust to hold FCC licenses. The precedential effect of granting this transaction is thus extremely significant.

Finally, Iridium counsel emphasized that the application fails to make any showing of public interest benefits flowing from the transaction. That Stratos' current shareholders get a good price for their stock is at best a private benefit, not a public benefit. In contrast, the transaction raises significant competitive and public interest harms.

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, a copy of this letter is being filed electronically for inclusion in the above-captioned docket. Please direct any questions about this matter to the undersigned.

Respectfully submitted,

/s/ Nancy J. Victory

Nancy J. Victory

cc: Helen Domenici
Frances Gutierrez
David Strickland
Arthur Lechtman