

**Response to Question 100**

The applicants submit this response to Question 100 of FCC Form 603 out of an abundance of caution. In 2005, the Commission dismissed a Petition for Declaratory Ruling (the "Petition") filed by the Inmarsat plc's subsidiary, Inmarsat Global Limited ("Inmarsat Global"), seeking United States market access to provide MSS in the 2 GHz band. Subsequent to Inmarsat Global's filing, the Commission assigned all 2 GHz spectrum currently allocated for MSS in the United States to two other satellite operators, and thus dismissed Inmarsat Global's Petition.<sup>1</sup> Inmarsat Global has sought reconsideration of both the Commission's disposition of the 2 GHz band and the accompanying dismissal of its Petition.<sup>2</sup>

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<sup>1</sup> *Use of Returned Spectrum in the 2 GHz Mobile Satellite Service Frequency Bands*, 20 FCC Rcd 19696 (2005); *Inmarsat Global Limited, Petition for Declaratory Ruling to Provide Mobile Satellite Service to the United States Using the 2 GHz and Extended Ku-Bands*, 20 FCC Rcd 19409 (2005).

<sup>2</sup> *Inmarsat Ventures Limited and Inmarsat Global Limited, Petition for Reconsideration*, File Nos. SAT-PPL-20050926-00184 *et al.* (filed Jan. 9, 2006).

Stratos Offshore Services Company  
Application to Transfer Control

*Supplement to Questions 108-115*

On July 5, 2007, licensee Stratos Offshore Services Company ("Stratos Offshore") timely-filed applications to renew its four Wireless Communications Service licenses (call signs KNLB212, KNLB319, KNLB320, KNLB321) (the "WCS Call Signs"), which were set to expire on July 21, 2007.<sup>1</sup> The Stratos Offshore WCS renewal applications remain pending with the Wireless Telecommunications Bureau, and Stratos Offshore continues to provide services pursuant to Section 1.955(a)(1) of the Commission's Rules. *See* 47 C.F.R. § 1.955(a)(1).

Although the renewal applications remain pending, the ULS application filing system does not provide a means to include those call signs in the attached Form 603 because the expiration date of the call signs has passed. Transferor Robert Franklin and transferee Inmarsat plc (collectively "Applicants") respectfully request that the WCS Call Signs be included among the licenses that are subject to the transfer of control described in the attached transfer of control application. Applicants understand that inclusion of the WCS Call Signs in the transfer of control application will be without prejudice to the Wireless Telecommunications Bureau's action on the underlying renewal applications.

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<sup>1</sup> *See* File Nos. 0003099720, 0003099839, 0003099830, 0003099774 (filed July 5, 2007). These applications were subsequently amended on August 22, 2007 and December 21, 2007.

Filing Type

1a)  Current Filing  Proposed Filing

1b) Is the purpose of this filing to report cellular cross-ownership holdings required pursuant to section 1.919 of the Commission's Rules?  Yes  No

If 'Yes', provide an exhibit with this filing that identifies the Rural Service Area market(s) involved, as well as the cellular licensee of which the filer has acquired direct or indirect ownership interest of 10% or greater.

Filer Information

2) First Name (if individual):	MI:	Last Name:	Suffix:
3) Filer Name (if entity): Stratos Offshore Services Company		4) FCC Registration Number (FRN): 0002147353	

5) Contact Information

Name and Address:  Stratos Offshore Services Company  6550 Rock Spring Drive, Suite 650 Bethesda, MD 20817 Attn: Bruce Henoch	Telephone Number: 301-214-8800
	Fax Number: 301-214-8801
	E-mail Address:

Related FCC Regulated Businesses of Filer

6a) Name of all FCC-Regulated Businesses owned by Filer (use additional sheets, if necessary):	6b) Principal Business:	6c) FCC Registration Number (FRN):	6d) Percent of Interest Held:
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Signature

7) Typed or Printed Name of Party Authorized to Sign

First Name: Bruce	MI:	Last Name: Henoch	Suffix:
Title: VP Legal and Regulatory Affairs			
Signature: Bruce Henoch			Date: 06/13/2008

WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(1) AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

Schedule for Disclosable Interest Holders

Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if individual):	MI:	Last Name:	Suffix:
2) Disclosable Interest Holder's Name (if entity): CIP Canada Investment Inc.		3) FCC Registration Number(FRN): 0017308248	
4) Disclosable Interest Holder's Address: 1200 Eighteenth St NW Washington, DC 20036			
5) Type of Interest in Filer ( ) (refer to instructions for a list of codes): Indirect Ownership Interest in Filer	6) Disclosable Interest Holder is a (n): ( ) (refer to instructions for list of codes): Corporation		7) Percent of Interest Held in Filer: 100.00
8) Disclosable Interest Holder's Type of Ownership ( ) (refer to instructions for a list of codes): Common Stock: Voting		9) Disclosable Interest Holder's Country of Citizenship or Jurisdiction of Formation: Canada	

Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)

10a) Name and address of all FCC-Regulated Businesses owned by the Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary)	10b) Principle Business	10c) FCC Registration Number (FRN)	10d) Percent of Interest Held

10a) Name and address of all FCC-Regulated Businesses owned by the Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary)	10b) Principle Business	10c) FCC Registration Number (FRN)	10d) Percent of Interest Held

Schedule for Disclosable Interest Holders

Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if individual):	MI:	Last Name:	Suffix:
2) Disclosable Interest Holder's Name (if entity): CIP UK Holdings Limited		3) FCC Registration Number(FRN): 0017308263	
4) Disclosable Interest Holder's Address: 1200 Eighteenth St. NW Washington, DC 20036			
5) Type of Interest in Filer ( ) (refer to instructions for a list of codes): Indirect Ownership Interest in Filer	6) Disclosable Interest Holder is a (n): ( ) (refer to instructions for list of codes): Corporation	7) Percent of Interest Held in Filer: 100.00	
8) Disclosable Interest Holder's Type of Ownership ( ) (refer to instructions for a list of codes): Common Stock: Voting	9) Disclosable Interest Holder's Country of Citizenship or Jurisdiction of Formation: United Kingdom		

Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)

10a) Name and address of all FCC-Regulated Businesses owned by the Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary)	10b) Principle Business	10c) FCC Registration Number (FRN)	10d) Percent of Interest Held

10a) Name and address of all FCC-Regulated Businesses owned by the Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary)	10b) Principle Business	10c) FCC Registration Number (FRN)	10d) Percent of Interest Held

Schedule for Disclosable Interest Holders

Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if individual):	MI:	Last Name:	Suffix:
2) Disclosable Interest Holder's Name (if entity): Inmarsat Finance III Limited		3) FCC Registration Number(FRN): 0017834987	
4) Disclosable Interest Holder's Address: 99 City Road London, United Kingdom EC1Y 1AX			
5) Type of Interest in Filer ( ) (refer to instructions for a list of codes): Indirect Ownership Interest in Filer	6) Disclosable Interest Holder is a (n): ( ) (refer to instructions for list of codes): Corporation		7) Percent of Interest Held in Filer: 100.00
8) Disclosable Interest Holder's Type of Ownership ( ) (refer to instructions for a list of codes): Common Stock: Voting	9) Disclosable Interest Holder's Country of Citizenship or Jurisdiction of Formation: United Kingdom		

Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)

10a) Name and address of all FCC-Regulated Businesses owned by the Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if neccessary)	10b) Principle Business	10c) FCC Registration Number (FRN)	10d) Percent of Interest Held

10a) Name and address of all FCC-Regulated Businesses owned by the Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary)	10b) Principle Business	10c) FCC Registration Number (FRN)	10d) Percent of Interest Held

Schedule for Disclosable Interest Holders

Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if individual):	MI:	Last Name:	Suffix:
2) Disclosable Interest Holder's Name (if entity): Inmarsat plc		3) FCC Registration Number(FRN): 0017809252	
4) Disclosable Interest Holder's Address: 99 City Road London, United Kingdom EC1Y 1AX			
5) Type of Interest in Filer ( ) (refer to instructions for a list of codes): Indirect Ownership Interest in Filer	6) Disclosable Interest Holder is a (n): ( ) (refer to instructions for list of codes): Corporation		7) Percent of Interest Held in Filer: 100.00
8) Disclosable Interest Holder's Type of Ownership ( ) (refer to instructions for a list of codes): Common Stock: Voting	9) Disclosable Interest Holder's Country of Citizenship or Jurisdiction of Formation: United Kingdom		

Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)

10a) Name and address of all FCC-Regulated Businesses owned by the Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary)	10b) Principle Business	10c) FCC Registration Number (FRN)	10d) Percent of Interest Held
Inmarsat Hawaii Inc.	Satellite Communications	0017460478	100.00
Inmarsat, Inc.	Satellite Communications	0014614739	100.00

**Schedule for Disclosable Interest Holders**

**Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)**

1) Disclosable Interest Holder's First Name (if individual):	MI:	Last Name:	Suffix:
2) Disclosable Interest Holder's Name (if entity): Stratos Global Corporation		3) FCC Registration Number(FRN): 0008262248	
4) Disclosable Interest Holder's Address: 6550 Rock Spring Drive Suite 650 Bethesda, MD 20817			
5) Type of Interest in Filer ( ) (refer to Instructions for a list of codes): Indirect Ownership Interest in Filer	6) Disclosable Interest Holder is a (n): ( ) (refer to instructions for list of codes): Corporation		7) Percent of Interest Held in Filer: 100.00
8) Disclosable Interest Holder's Type of Ownership ( ) (refer to instructions for a list of codes): Common Stock: Voting	9) Disclosable Interest Holder's Country of Citizenship or Jurisdiction of Formation: Canada		

**Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)**

10a) Name and address of all FCC-Regulated Businesses owned by the Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary)	10b) Principle Business	10c) FCC Registration Number (FRN)	10d) Percent of Interest Held
Stratos Communications, Inc.	Satellite Communications	0004078440	100.00
Stratos Mobile Networks, Inc.	Satellite Communications	0008262784	100.00

Schedule for Disclosable Interest Holders

**Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)**

1) Disclosable Interest Holder's First Name (if individual):	MI:	Last Name:	Suffix:
2) Disclosable Interest Holder's Name (if entity): Stratos Holdings, Inc.		3) FCC Registration Number(FRN): 0008048811	
4) Disclosable Interest Holder's Address: 6550 Rock Spring Drive Suite 650 Bethesda, MD 20817			
5) Type of Interest in Filer ( ) (refer to Instructions for a list of codes): Direct Ownership Interest in Filer	6) Disclosable Interest Holder is a (n): ( ) (refer to Instructions for list of codes): Corporation		7) Percent of Interest Held in Filer: 100.00
8) Disclosable Interest Holder's Type of Ownership ( ) (refer to instructions for a list of codes): Common Stock: Voting	9) Disclosable Interest Holder's Country of Citizenship or Jurisdiction of Formation: United States		

**Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)**

10a) Name and address of all FCC-Regulated Businesses owned by the Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary)	10b) Principle Business	10c) FCC Registration Number (FRN)	10d) Percent of Interest Held
Stratos Communications, Inc.	Satellite Communications	0004078440	100.00
Stratos Mobile Networks, Inc.	Satellite Communications	0008262784	100.00

Schedule for Disclosable Interest Holders

Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if individual):	MI:	Last Name:	Suffix:
2) Disclosable Interest Holder's Name (if entity): Stratos Wireless, Inc.		3) FCC Registration Number(FRN): 0008268062	
4) Disclosable Interest Holder's Address: Donovan's Business Park 34 Glencoe Drive Mount Pearl Newfound, Canada A1N 4S8			
5) Type of Interest in Filer ( ) (refer to Instructions for a list of codes): Indirect Ownership Interest in Filer	6) Disclosable Interest Holder is a (n): ( ) (refer to instructions for list of codes): Corporation		7) Percent of Interest Held in Filer: 100.00
8) Disclosable Interest Holder's Type of Ownership ( ) (refer to instructions for a list of codes): Common Stock: Voting	9) Disclosable Interest Holder's Country of Citizenship or Jurisdiction of Formation: Canada		

Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)

10a) Name and address of all FCC-Regulated Businesses owned by the Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary)	10b) Principle Business	10c) FCC Registration Number (FRN)	10d) Percent of Interest Held
Stratos Communications, Inc.	Satellite Communications	0004078440	100.00
Stratos Mobile Networks, Inc.	Satellite Communications	0008262784	100.00

Attachment(s):

Type	Description	Date Entered
I	<i>Indirect Ownership</i>	200801
I	<i>Indirect Ownership</i>	200806

**FCC Form 602**

***Exhibit 1***

**FCC Ownership Disclosure Information**

Stratos Offshore Services Company ("Stratos Offshore") is a wholly-owned direct subsidiary of Stratos Holdings, Inc. (a Delaware corporation), which is a wholly-owned direct subsidiary of Stratos Wireless Inc. ("Stratos Wireless") (a Canadian corporation). In turn, Stratos Wireless is a wholly-owned direct subsidiary of Stratos Global Corporation ("Stratos Global") (also a Canadian corporation). In December 2007, pursuant to Commission consent, all of Stratos Global's shares were transferred to an irrevocable trust for which Robert M. Franklin, a Canadian citizen, is the trustee. *See Stratos Global Corporation, Transferor, Robert M. Franklin, Transferee, Consolidated Application for Consent to Transfer of Control, Memorandum Opinion and Order and Declaratory Ruling, FCC 07-213 (rel. Dec. 7, 2007).*

Applications have been filed with the Commission proposing a new transfer of control. Specifically, the applications seek Commission consent to transfer control of Stratos Offshore's ultimate parent corporation, Stratos Global, from Mr. Franklin to Inmarsat plc ("Inmarsat"), a company formed under the laws of England and Wales. This submission is being provided with respect to Inmarsat, the entity proposed to be in ultimate control of Stratos Global. Further information in the pending transfer of control applications is incorporated herein by reference. *See, e.g.,* WTB File No. 0003453455 (filed June 13, 2008).

The proposed post-transaction ownership and control of Stratos Offshore is shown in Appendix A to this exhibit.

**Appendix A**  
**POST-TRANSACTION OWNERSHIP AND CONTROL OF THE STRATOS LICENSEES**

