

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	IB Docket No. 08-143
Robert M. Franklin, Trustee, Inmarsat plc)	
And Stratos Global Corporation)	DA 08-1659
)	
)	FCC File Nos.:
Applications for Consent to Transfer of)	
Control of Stratos Global Corporation and)	ITC-T/C-20080618-00276
Its Subsidiaries from an Irrevocable Trust)	ITC-T/C-20080618-00275
To Inmarsat plc, and Petition for a)	SES-T/C-20080618-00818
Declaratory Ruling)	SES-T/C-20080618-00821
)	SES-T/C-20080618-00820
)	SES-T/C-20080618-00819
)	0003453455
)	ISP-PDR-20080618-00013

To: The Commission

**REPLY TO OPPOSITION TO MOTION FOR EXTENSION OF TIME
OF VIZADA, INC. AND VIZADA SERVICES LLC**

Vizada, Inc. (formerly Telenor Satellite Services, Inc.) and VIZADA Services LLC (formerly FTMSC US, LLC) (hereafter together “Vizada”), hereby respond to the Joint Opposition to Vizada’s Motion for Extension of Time for filing a reply in the above-captioned Application of Robert M. Franklin, Trustee, and Inmarsat plc (“Inmarsat”) and the related Petition for Declaratory Ruling seeking Commission approval for the indirect transfer of control to Inmarsat of Stratos Global Corporation and its wholly-owned subsidiaries that hold Commission licenses and authorizations (“Stratos” and, together with Inmarsat, the “Applicants”).

On August 22, 2008, Vizada filed a Motion for Extension of Time (“Motion”) in the above-referenced proceeding asking the Commission to extend the reply deadline to September 15, 2008. In their Joint Opposition, the Applicants object to this reasonable request for a brief extension, despite the fact that they do not need Commission action until April 15, 2009 – the earliest date on which the Applicants may close on the transaction if approved.¹ The Applicants assert that Vizada has asked for an “extraordinarily long” extension,² although the requested extension is less than two weeks and will not cause significant delay in the Commission’s process. The Applicants also suggest that the extension would be to their “detriment,”³ even though the extra nine business days (thirteen calendar days) Vizada has requested would have no effect on the Applicants’ ability to close by April 15, 2009 if the Commission were to approve the transaction.

Vizada has requested an extension of time, not as a “strategy of delay” as the Applicants have characterized it,⁴ but in an effort to provide the Commission with more meaningful comments and a better record on which to base its decision. Although Vizada filed its Motion before the Applicants’ Opposition was due,⁵ it was clear that the Applicants would likely file new information in response to the arguments in Vizada’s Petition to Deny. Indeed, the Applicants have filed two separate oppositions to Vizada’s Petition to Deny – each containing a different set of issues to which Vizada will have to respond. Inmarsat’s Opposition, in particular, contains new substantive facts which Vizada is currently analyzing. While the upcoming Labor

¹ *Robert M. Franklin, Trustee, and Inmarsat plc seek FCC Consent to Transfer Control of Stratos Global Corporation and Its Subsidiaries from an Irrevocable Trust to Inmarsat plc*, Public Notice, IB Docket No. 08-143, DA 08-1669 (rel. Jul. 14, 2008) at 3.

² Joint Opposition to Motion for Extension of Time at 2.

³ *Id.*

⁴ *Id.*

⁵ Section 1.46(b) of the Commission’s rules require requests for extensions of time to be filed at least seven days before the filing date. In order to comply with this rule, Vizada had to file its request for extension before actually receiving the Applicants’ Oppositions. See 47 C.F.R. § 1.46(b).

Day holiday and vacation schedules of key Vizada personnel remain valid reasons and good cause for granting Vizada's Motion, the ability to respond to substantial new information contained in the Oppositions provides an even more compelling rationale. Eight days (during which a United States Government holiday occurs) is an insufficient amount of time to analyze this new information and its impact on the market for mobile satellite services.

In major transactions such as this one, the Commission has found it to be in the public interest to allow additional time for public comment.⁶ In each of these recent cases, the Commission has weighed in favor of facilitating a better, more complete record given the importance of the transaction – despite opposition to such motions by the applicants.⁷ Here, too, the transaction under consideration is highly complex and has wide-ranging implications for customers of mobile satellite services. Vizada is committed to analyzing thoroughly and commenting fully on all of the far-reaching implications of this transaction, and will be better able to do so with the input of its key personnel and with additional time to review new and substantive information filed by the Applicants on August 25, 2008. The Commission should allow Vizada to do so by extending the reply deadline.

⁶ *In the Matter of Applications of Cellco Partnership d/b/a Verizon Wireless and Rural Cellular Corporation For Consent To Transfer Control of Licenses, Authorizations, and Spectrum Manager Leases and Petitions for Declaratory Ruling that the Transaction is Consistent with Section 310(b)(4) of the Communications Act*, Order, 22 FCC Rcd 19799 (WTB 2007) (“*Verizon/RCC*”) (granting 90-day extension despite opposition of applicants); *In the Matter of Applications Filed for the Transfer of Certain Spectrum Licenses and Section 214 Authorizations in the States of Maine, New Hampshire, and Vermont from Verizon Communications Inc. and its Subsidiaries to FairPoint Communications, Inc.*, Order, 22 FCC Rcd 6897 (WCB 2007) (“*Verizon/FairPoint*”) (granting two week extension, where only a one week extension was supported by applicants); *In the Matter of Applications of Cellco Partnership d/b/a Verizon Wireless and Atlantis Holdings LLC, For Consent to Transfer Control of Licenses, Authorizations, and Spectrum Manager and De Facto Transfer Leasing Arrangements and Petition for Declaratory Ruling that the Transaction is Consistent with Section 310(b)(4) of the Communications Act*, Order, 23 FCC Rcd 11210 (WTB 2008) (“*Verizon/Alltel*”) (granting two week extension despite opposition by applicants).

⁷ *Verizon/RCC*, 22 FCC Rcd at ¶¶ 4 and 9 (citing “wide-ranging and highly significant” impact of merger); *Verizon/FairPoint*, 22 FCC Rcd at ¶ 2 (“providing additional time to file in the docket will facilitate the development of a more substantive and complete record in this proceeding, without hardship to the applicants”); *Verizon/Alltel*, 23 FCC Rcd at ¶ 11 (finding it in the public interest to allow parties “additional time to consider and analyze” new information filed by the applicants).

As Vizada stated in its Motion, an extension of nine business days (thirteen calendar days) for the reply deadline in this proceeding will not prejudice the Applicants, and will significantly improve the quality of the record on which the Commission will base its decision. Therefore, Vizada requests that the Commission extend the reply deadline to September 15, 2008.

Respectfully submitted,

VIZADA, INC.
VIZADA SERVICES LLC

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August 27, 2008

CERTIFICATE OF SERVICE

I, Kimberly Reindl, hereby certify that on this 27th day of August, 2008, I caused to be served a true copy of the foregoing "Reply to Opposition to Motion for Extension of Time of Vizada, Inc. and VIZADA Services LLC" by electronic mail and by first-class, postage-prepaid U.S. mail upon the following:

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