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March 30, 2009

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

**Re: In the Matter of Robert M. Franklin, Trustee, Inmarsat plc, and  
Stratos Global Corporation, IB Docket No. 08-143, DA 08-1659, ISPPDR-  
20080618-00013**

*EX PARTE PRESENTATION*

Dear Ms. Dortch:

In a meeting last week with International Bureau staff (which was the subject of an ex parte notice filed on March 25, 2009), Inmarsat was requested to provide additional detail on its distribution arrangements. This letter responds to that request.

Inmarsat sells its mobile satellite services exclusively to third-party resellers. Specifically, Inmarsat provides its services on a wholesale basis to distributors, who both (i) resell those services directly to end-users, and (ii) resell them to retailers, who, in turn, resell the same services to end users. We have over 30 distributors and hundreds of retailers in this distribution network.

Under Inmarsat's current arrangements with its distributors (which expire on April 14, 2009, independent of this transaction), we cannot contract with retailers or end-users of our services. That restriction does not exist under Inmarsat's new distribution arrangements.

For its demand-based services, Inmarsat charges its distributors wholesale rates, based on the duration of a transmission or the volume of data transmitted, subject to a volume discount arrangement. Inmarsat also leases satellite capacity on its spacecraft at rates that are independent of the duration of the transmissions or the volume of data transmitted. Inmarsat wholesales that leased capacity to distributors, who resell it to third parties, such as the U.S. and Australian military.

Most of Inmarsat's distributors operate the land earth stations that transmit and receive its "existing and evolved" services to and from the Inmarsat satellites, or that transmit and receive signals to the leased capacity on its satellites. In the case of Inmarsat's newer BGAN services, traffic is handled by Inmarsat's own land earth stations.

Terminals used to access Inmarsat services are built by independent manufacturers, based on performance specifications that we develop with those manufacturers.

The top two Inmarsat distributors in terms of revenue are Stratos and Vizada. Together, those two entities accounted for approximately eighty percent of Inmarsat service revenues in 2008. Individually, Stratos and Vizada were slightly above and below forty percent each, respectively. The remaining twenty percent of service revenues in 2008 was divided among the other distributors. Vizada, Stratos, and most of the other distributors also distribute mobile VSAT services and the services of other MSS system operators. The other Inmarsat distributors include:

ACeS  
Beijing MCN  
ChinaSat  
Embratel  
KDDI  
KT (Korea Telecom)  
MVS  
Otesat  
SatCom Global  
SingTel  
Stratos  
Tata  
Telecom Italia  
Telefonica  
Thales  
VISHIPEL

Many other entities around the world distribute mobile VSAT services and/or the services of other mobile satellite operators (including Inmarsat, Iridium, Thuraya, Globalstar, etc.). A sampling is listed below:

Axiom  
Beam Communications  
Blue Sky Network  
Broadpoint  
CapRock  
DTS  
Elektrikom  
European Datacomm NV  
Eutelsat@Sea  
Gilat Satcom  
Global Plus  
Horizon Mobile Communications Co. Ltd.  
Hughes Network Systems

