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FILED/ACCEPTED

MAR - 8 2010

Federal Communications Commission
Office of the Secretary

February 19, 2010

VIA FEDERAL EXPRESS

Federal Communications Commission
1280 Fairfield Road
Gettysburg, PA 17325

Re: *Request for Special Temporary Authority*

Dear Sir or Madam:

On behalf of Stratos Offshore Services Company, enclosed please find an original and four (4) copies of an application seeking Special Temporary Authority ("STA") to operate links in the Wireless Communications Service ("WCS") at various points within twelve (12) nautical miles of the Gulf of Mexico shoreline. Inasmuch as ULS is not presently equipped to allow the electronic preparation and submission of WCS STA requests, the applicant respectfully requests a waiver of the Commission's electronic filing requirements to allow submission of this request in paper form.[1] There are no Commission or application processing fees applicable to this filing.

Kindly contact the undersigned with any questions you may have regarding this application.

Sincerely,

WILKINSON BARKER KNAUER, LLP

Christine M Crowe

Christine M. Crowe

RECV'D & INSPECTED

FEB 22 2010

FCC-GBG MAILROOM

Attachments

[1] 47 C.F.R. § 1.913(b).

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). On January 16, 2009, a transfer of control was approved involving Stratos Global and its subsidiaries, including Stratos Offshore. *See In the Matter of Robert M. Franklin, Transferor and Inmarsat, plc, Transferee*, Memorandum Opinion and Order and Declaratory Ruling, DA 09-117 (Jan. 16, 2009)("*Order*"). Specifically, the *Order* approved a transfer of 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. In addition, the *Order* contained a Declaratory Ruling approving the foreign ownership of Stratos Global, and its subsidiaries, by Inmarsat. *See Order* at ¶¶ 70-71. The transaction set forth in the *Order* was consummated by the parties on April 15, 2009.

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

Stratos Offshore Services Company ("Stratos") hereby requests pursuant to Section 1.931(a) of the Commission's Rules a special temporary authority ("STA") for a period of 180 days to allow operation of certain 2.3 GHz point-to-point Wireless Communications Service ("WCS") microwave links in the Gulf of Mexico.[1] The specific links to be authorized under the requested STA are identified in Attachment A.

Stratos is an international provider of vital communications resources, including the largest and only comprehensive communications network in the Gulf of Mexico. This network, consisting of microwave, satellite, and other forms of radio communications, links together hundreds of offshore oil and gas exploration and production platforms. Stratos' customers rely on these communications resources to monitor unmanned facilities, control sea traffic and, in the event of emergencies, to coordinate fire, safety and rescue personnel. Stratos is the licensee of all four 2.3 GHz band WCS licenses covering the Gulf of Mexico service area, and utilizes that spectrum extensively in providing service to its customers.[2] These 2.3 GHz band WCS licenses authorize Stratos to deploy facilities anywhere within the Gulf of Mexico service area, which begins 12 nautical miles from the shoreline and extends outward into the Gulf.[3]

Stratos recently discovered that the links identified in Attachment A have been operating within 12 nautical miles of the shoreline, without the requisite authorization. The links at issue are crucial for the monitoring and protecting of customers' vital offshore assets. They are critical to the coordination of public safety operations in the event of emergencies, including the safety of workers and the prevention and control of environmental hazards such as oil spills. In addition, continued operation on WCS spectrum is the only viable means for maintaining these critical communications. Stratos cannot simply reprogram the end-user equipment to operate on other frequencies, such as the unlicensed 2.4 GHz band; any such frequency change would require a change-out of customer equipment that is not practicable within the necessary timeframe.

Stratos is seeking an STA to permit the continued operation of these links on an interim basis so that those on offshore platforms served via the links will retain their ability to communicate in the event of an emergency or natural disaster while Stratos secures appropriate authority for continued operations in this area. To that end, Stratos is commencing spectrum lease negotiations with the land-based WCS licensees in the affected areas (NW Spectrum Co., WCS Wireless License Subsidiary, LLC (a subsidiary of NextWave), BellSouth Mobile Data, Inc. and Unrestricted Subsidiary Funding Company (a subsidiary of Sprint)), and is optimistic that within the term of the requested

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[1] 47 C.F.R. § 1.931.

[2] KNLB212, KNLB319, KNLB320, and KNLB321.

[3] *See* 47 C.F.R. § 27.6(a)(2).

STA it will be being able to apply to the Commission for consent to spectrum leases covering the operations at issue. Of course, until the Commission authorizes such a spectrum lease, any use of the 2.3 GHz band pursuant to the requested STA would be on a purely secondary basis, and Stratos will terminate such operations immediately should it cause harmful interference to NW Spectrum, WCS Wireless License, BellSouth Mobile and Unrestricted Sub. As is evidenced by Attachment B, NW Spectrum, WCS Wireless License, BellSouth Mobile and Unrestricted Sub do not object to grant of the requested STA.

By way of background, Stratos acquired its four WCS licenses in 2000 from Shell Offshore Services Company ("Shell") pursuant to FCC consent.[4] Two of the links at issue here (Links BA451-BAA19 and 43AA-WD89A on Attachment A) are used for backhaul, and were part of the network Stratos acquired from Shell. While some Shell employees joined Stratos after the acquisition, none of the employees responsible for the engineering of Shell's WCS system remain employed by Stratos at this time. However, based upon the due diligence it has conducted, Stratos believes that these links were placed into service as the result of a lack of understanding by Shell that the station authorization for the Gulf of Mexico service area did not permit operations within 12 nautical miles of the shoreline, absent other authority or arrangement. Stratos believes that the other links identified on Attachment A (which are "last-mile" facilities to customer offshore rig locations) were placed into service in the 2007-2008 timeframe based upon either an assumption that such operations must have been authorized since the prior licensee had placed links into service within the area, or by a similar lack of understanding of the border of the Gulf of Mexico license area.

Stratos recently discovered these errors in connection with its review of available spectrum being offered in the auction of Broadband Radio Service ("BRS") licenses, since BRS license areas in and adjacent to the Gulf of Mexico are subject to the same provisions as are WCS licenses with respect to operation in the Gulf within 12 nautical miles of the shoreline. Upon ascertaining the scope of the situation, Stratos contacted the affected WCS land-based licensees and is filing the instant request for STA to secure a temporary solution to the problem, which Stratos intends to supplement with a more permanent solution as soon as possible.

Stratos therefore requests that the Commission grant this STA request for a period of 180 days. In addition, inasmuch as ULS is not equipped to allow the electronic preparation and submission of WCS STA requests, the applicant respectfully requests a waiver of the Commission's electronic application filing requirements in order to file the instant request in paper form.[5] The Commission may waive its rules for good cause shown.[6] The Commission also may grant a waiver where application of its rules would

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[4] *See* FCC File No. 0000057349.

[5] 47 C.F.R. § 1.913(b).

[6] 47 C.F.R. § 1.3.

be inequitable, unduly burdensome or contrary to the public interest, or where the applicant has no reasonable alternative.[7] Both standards are satisfied in this instance. Specifically, absent waiver of the Commission's rules, the applicant would be foreclosed from requesting an STA, leaving it with no reasonable alternative. As a result, Commission approval of this request will serve the public interest, convenience and necessity.

[7] 47 C.F.R. § 1.925(b)(3).

ATTACHMENT A

2.3 GHz Links Operating Within 12 Nautical Miles of Shoreline

Back Bone Area	Frequency				
	Backbone		SU		Channel Block
Matagorda Island	MI 703	2311.250	MI 696	2356.250	B
	MI 622	2356.250	MI 623	2311.250	B
SA	SA 10	2311.250	WC 294	2356.250	B
West Cameron	WC 71	2313.750	WC 65	2358.750	B
	WC 71	2312.083	WC 66A	2357.083	B
	WC 71	2311.250	WC 66B	2356.250	B
	WC 71	2314.583	WC144	2359.583	B
	WC 71	2310.417	EC 47	2355.417	B
	WC 71	2312.917	EC2A	2357.917	B
S.Pelto	PL 10	2311.250	PL2JA	2356.250	B
	PL 10	2310.417	SS 91	2355.417	B
S.Pass	SP 57/78	2314.583	SP 52	2359.583	B
	SP 57/78	2312.917	SP 75	2357.917	B
Main Pass	MP140B	2311.250	MP 140A	2356.250	B
Brazos	BA 451	2347.500	BAA 19	2315.500	D&C
West Delta	WD 90	2357.083	WD 105	2312.083	B
Grand Isle	GI 43AA	2307.5	WD 89A	2352.5	A

ATTACHMENT B

CONSENT OF BELLSOUTH MOBILE DATA, INC.

AT&T Services, Inc.
675 W Peachtree St NE
4300
Atlanta, GA 30375-0001

F: 404.614.4054

February 16, 2010

Bruce Henoch
Vice President, Legal and Regulatory Affairs
Stratos Offshore Services Company
6550 Rock Spring Drive, Suite 650
Bethesda, Maryland 20817

Re: Temporary Use of WCS Spectrum in 12 Mile Coastal Zone
Under Call Signs KNLB214 and KNLB237

Dear Mr. Henoch:

In response to your request for temporary use of BellSouth Mobile Data, Inc.'s ("BellSouth") WCS spectrum for a period of one hundred and eighty (180) days to permit the continued operation of links necessary for the monitoring and protection of customers' offshore assets, BellSouth grants permission for the temporary use of its licensed WCS spectrum, Call Signs KNLB214 and KNLB237, under the following conditions:

- The temporary facilities must operate under the specifications included in Attachment 1 hereto.
- BellSouth must be informed of any changes and approve such changes in advance of their implementation.
- Temporary use of the licensed WCS spectrum referenced above begins upon grant of the associated STA by the Commission, and ends no later than 180 days thereafter.
- Stratos will provide contact information that is available 24 hours each day, 7 days each week, during the period of time the temporary equipment is operational to allow BellSouth or its affiliates to report any interference to its operations associated with these licenses. The contact information will be delivered to Jeannie Harris of AT&T at 308 S. Akard Street, Room 830.A6, Dallas, TX 75202, email: hj7493@att.com, and will include the contact's name, title, company name, office telephone number, mobile telephone number, e-mail address, mailing address and a back-up contact if the primary contact is unavailable due to situations beyond his/her control.
- If BellSouth or any of its affiliates report any interference, Stratos will immediately turn off the temporary equipment until the source of the interference is resolved to BellSouth's satisfaction.

USA Proud Sponsor of the U.S. Olympic Team

If you have any questions or require additional information, please contact Jeannie Harris on 214-858-0906.

Sincerely,

Mary Jo Peed
Vice President and Secretary
BellSouth Mobile Data, Inc.

ATTACHMENT 1

	MI-622	MI-623
Elevation (ft)	0.00	0.00
Latitude	28 06 07.00 N	28 06 22.50 N
Longitude	096 22 52.90 W	096 25 46.90 W
True azimuth (°)	275.68	95.66
Vertical angle (°)	-0.09	0.06
Antenna model	GHF6-23A	GHF6-23A
Antenna height (ft)	85.00	65.00
Antenna gain (dBi)	30.60	30.60
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	100.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	3.60	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Vertical	
Path length (mi)	3.00	
Free space loss (dB)	113.50	
Atmospheric absorption loss (dB)	0.03	
Net path loss (dB)	59.93	59.93
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	0.10	0.10
TX power (dBm)	20.00	20.00
EIRP (dBm)	46.80	46.80
Emission designator	800KD7W	800KD7W
TX Channels	1H 2356.2500V	1H 2311.2500V
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-39.93	-39.93
Thermal fade margin (dB)	42.07	42.07
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	42.06	42.06
C factor	6.00	
Fade occurrence factor (Po)	9.45E-04	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99999	99.99999
(sec)	0.15	0.15
Annual - multipath (%)	100.00000	100.00000
(sec)	0.65	0.65
(% - sec)	100.00000 - 1.30	

Fri, Dec 04 2009
MAT622-MI623.pl4
Reliability Method - Vigants - Barnett

	SA10	WC-294
Elevation (ft)	0.00	0.00
Latitude	29 29 52.80 N	29 17 32.80 N
Longitude	093 46 47.60 W	093 36 55.70 W
True azimuth (°)	144.95	325.03
Vertical angle (°)	-0.13	-0.06
Antenna model	GHF8-23	GHF8-23
Antenna height (ft)	145.00	90.00
Antenna gain (dBi)	33.10	33.10
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	145.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	5.22	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Horizontal	
Path length (mi)	17.29	
Free space loss (dB)	128.71	
Atmospheric absorption loss (dB)	0.17	
Net path loss (dB)	71.90	71.90
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	1.00	1.00
TX power (dBm)	30.00	30.00
EIRP (dBm)	57.68	59.30
Emission designator	800KD7W	800KD7W
TX Channels	1L 2311.2500H	1H 2356.2500H
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-41.90	-41.90
Thermal fade margin (dB)	40.10	40.10
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	40.09	40.09
C factor	6.00	
Fade occurrence factor (Po)	1.81E-01	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99823	99.99823
(sec)	46.50	46.50
Annual - multipath (%)	99.99938	99.99938
(sec)	195.31	195.31
(% - sec)	99.99876 - 390.62	

Fri, Dec 04 2009
SA10-WC294.pl4
Reliability Method - Vigants - Barnett

	WC71	EC-2A
Elevation (ft)	0.00	0.00
Latitude	29 35 34.10 N	29 39 34.03 N
Longitude	093 08 55.40 W	093 00 13.40 W
True azimuth (°)	62.22	242.29
Vertical angle (°)	-0.08	-0.03
Antenna model	GHF6-23A	GHF8-23
Antenna height (ft)	85.00	65.00
Antenna gain (dBi)	30.60	33.10
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	100.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	3.60	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Vertical	
Path length (mi)	9.86	
Free space loss (dB)	123.84	
Atmospheric absorption loss (dB)	0.10	
Net path loss (dB)	67.83	67.83
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	0.10	0.10
TX power (dBm)	20.00	20.00
EIRP (dBm)	46.80	49.30
Emission designator	800KD7W	800KD7W
TX Channels	1L 2312.9170V	1H 2357.9170V
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-47.83	-47.83
Thermal fade margin (dB)	34.17	34.17
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	34.17	34.17
C factor	6.00	
Fade occurrence factor (Po)	3.35E-02	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99871	99.99871
(sec)	33.78	33.78
Annual - multipath (%)	99.99955	99.99955
(sec)	141.88	141.88
(% - sec)	99.99910 - 283.76	

Fri, Dec 04 2009
WC71-EC2A.pl4
Reliability Method - Vigants - Barnett

	WC71	EC-47JP
Elevation (ft)	0.00	0.00
Latitude	29 35 34.10 N	29 26 26.30 N
Longitude	093 08 55.40 W	092 58 39.60 W
True azimuth (°)	135.44	315.53
Vertical angle (°)	-0.12	-0.04
Antenna model	GHF6-23A	GHF6-23A
Antenna height (ft)	135.00	85.00
Antenna gain (dBi)	30.60	30.60
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	100.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	3.60	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Horizontal	
Path length (mi)	14.70	
Free space loss (dB)	127.30	
Atmospheric absorption loss (dB)	0.15	
Net path loss (dB)	73.85	73.85
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	1.00	1.00
TX power (dBm)	30.00	30.00
EIRP (dBm)	56.80	56.80
Emission designator	800KD7W	800KD7W
TX Channels	1L 2310.4170H	1H 2355.4170H
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-43.85	-43.85
Thermal fade margin (dB)	38.15	38.15
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	38.15	38.15
C factor	6.00	
Fade occurrence factor (Po)	1.11E-01	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99830	99.99830
(sec)	44.74	44.74
Annual - multipath (%)	99.99940	99.99940
(sec)	187.90	187.90
(% - sec)	99.99881 - 375.80	

Fri, Dec 04 2009
WC71-EC47JP.pl4
Reliability Method - Vigants - Barnett

	WC71	WC-66A
Elevation (ft)	0.00	0.00
Latitude	29 35 34.10 N	29 39 07.40 N
Longitude	093 08 55.40 W	093 07 18.70 W
True azimuth (°)	21.60	201.62
Vertical angle (°)	-0.05	-1.61e-03
Antenna model	GHF6-23A	GHF6-23A
Antenna height (ft)	54.00	45.00
Antenna gain (dBi)	30.60	30.60
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	100.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	3.60	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Horizontal	
Path length (mi)	4.39	
Free space loss (dB)	116.81	
Atmospheric absorption loss (dB)	0.04	
Net path loss (dB)	63.25	63.25
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	0.32	0.32
TX power (dBm)	25.00	25.00
EIRP (dBm)	51.80	51.80
Emission designator	800KD7W	800KD7W
TX Channels	1L 2312.0830H	1H 2357.0830H
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-38.25	-38.25
Thermal fade margin (dB)	43.75	43.75
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	43.74	43.74
C factor	6.00	
Fade occurrence factor (Po)	2.96E-03	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99999	99.99999
(sec)	0.33	0.33
Annual - multipath (%)	100.00000	100.00000
(sec)	1.38	1.38
(% - sec)	99.99999 - 2.76	

Fri, Dec 04 2009
WC71-WC66A.pl4
Reliability Method - Vigants - Barnett

	WC71	WC-66B
Elevation (ft)	0.00	0.00
Latitude	29 35 34.10 N	29 38 46.70 N
Longitude	093 08 55.40 W	093 08 31.40 W
True azimuth (°)	6.21	186.22
Vertical angle (°)	-0.01	-0.03
Antenna model	GHF6-23A	GHF6-23A
Antenna height (ft)	47.00	50.00
Antenna gain (dBi)	30.60	30.60
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	100.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	3.60	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Vertical	
Path length (mi)	3.71	
Free space loss (dB)	115.34	
Atmospheric absorption loss (dB)	0.04	
Net path loss (dB)	61.77	61.77
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	0.20	0.20
TX power (dBm)	23.00	23.00
EIRP (dBm)	49.80	49.80
Emission designator	800KD7W	800KD7W
TX Channels	1L 2311.2500V	1H 2356.2500V
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-38.77	-38.77
Thermal fade margin (dB)	43.23	43.23
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	43.22	43.22
C factor	6.00	
Fade occurrence factor (Po)	1.78E-03	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99999	99.99999
(sec)	0.22	0.22
Annual - multipath (%)	100.00000	100.00000
(sec)	0.94	0.94
(% - sec)	99.99999 - 1.88	

Fri, Dec 04 2009
WC71-WC66B.pl4
Reliability Method - Vigants - Barnett

	WC71	WC-144A
Elevation (ft)	0.00	0.00
Latitude	29 35 34.10 N	29 25 17.70 N
Longitude	093 08 55.40 W	093 09 54.30 W
True azimuth (°)	184.78	4.77
Vertical angle (°)	-0.10	-0.03
Antenna model	GHF6-23A	GHF6-23A
Antenna height (ft)	100.00	66.00
Antenna gain (dBi)	30.60	30.60
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	100.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	3.60	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Horizontal	
Path length (mi)	11.83	
Free space loss (dB)	125.42	
Atmospheric absorption loss (dB)	0.12	
Net path loss (dB)	71.94	71.94
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	1.00	1.00
TX power (dBm)	30.00	30.00
EIRP (dBm)	56.80	56.80
Emission designator	800KD7W	800KD7W
TX Channels	1L 2314.5830H	1H 2359.5830H
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-41.94	-41.94
Thermal fade margin (dB)	40.06	40.06
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	40.06	40.06
C factor	6.00	
Fade occurrence factor (Po)	5.80E-02	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99943	99.99943
(sec)	15.04	15.04
Annual - multipath (%)	99.99980	99.99980
(sec)	63.19	63.19
(% - sec)	99.99960 - 126.37	

Fri, Dec 04 2009
WC71-WC144A.pl4
Reliability Method - Vigants - Barnett

	WC71	WC-65JA
Elevation (ft)	0.00	0.00
Latitude	29 35 34.10 N	29 37 39.20 N
Longitude	093 08 55.40 W	093 10 20.70 W
True azimuth (°)	329.22	149.21
Vertical angle (°)	-0.03	4.33e-03
Antenna model	GHF6-23A	GHF6-23A
Antenna height (ft)	50.00	45.00
Antenna gain (dBi)	30.60	30.60
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	100.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	3.60	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Horizontal	
Path length (mi)	2.79	
Free space loss (dB)	112.86	
Atmospheric absorption loss (dB)	0.03	
Net path loss (dB)	59.29	59.29
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	0.10	0.10
TX power (dBm)	20.00	20.00
EIRP (dBm)	46.80	46.80
Emission designator	800KD7W	800KD7W
TX Channels	1L 2313.7500H	1H 2358.7500H
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-39.29	-39.29
Thermal fade margin (dB)	42.71	42.71
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	42.71	42.71
C factor	6.00	
Fade occurrence factor (Po)	7.57E-04	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	100.00000	100.00000
(sec)	0.11	0.11
Annual - multipath (%)	100.00000	100.00000
(sec)	0.45	0.45
(% - sec)	100.00000 - 0.90	

Fri, Dec 04 2009
WC71-WC65JA.pl4
Reliability Method - Vigants - Barnett

	PL10	PL-2JA
Elevation (ft)	0.00	0.00
Latitude	28 56 53.00 N	29 00 27.00 N
Longitude	090 43 26.00 W	090 39 26.00 W
True azimuth (°)	44.58	224.62
Vertical angle (°)	-0.04	-0.03
Antenna model	GHF6-23A	GHF6-23A
Antenna height (ft)	65.00	63.00
Antenna gain (dBi)	30.60	30.60
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	100.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	3.60	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Horizontal	
Path length (mi)	5.75	
Free space loss (dB)	119.15	
Atmospheric absorption loss (dB)	0.06	
Net path loss (dB)	65.61	65.61
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	0.50	0.50
TX power (dBm)	27.00	27.00
EIRP (dBm)	53.80	53.80
Emission designator	800KD7W	800KD7W
TX Channels	1L 2311.2500H	1H 2356.2500H
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-38.61	-38.61
Thermal fade margin (dB)	43.39	43.39
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	43.38	43.38
C factor	6.00	
Fade occurrence factor (Po)	6.65E-03	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99997	99.99997
(sec)	0.80	0.80
Annual - multipath (%)	99.99999	99.99999
(sec)	3.37	3.37
(% - sec)	99.99998 - 6.74	

Fri, Dec 04 2008
PL10-PL2JA.pl4
Reliability Method - Vigants - Barnett

	PL10	SS-91B
Elevation (ft)	0.00	0.00
Latitude	28 56 53.00 N	28 55 07.65 N
Longitude	090 43 26.00 W	090 46 22.70 W
True azimuth (°)	235.88	55.86
Vertical angle (°)	-0.28	0.24
Antenna model	GHF6-23A	GHF6-23A
Antenna height (ft)	130.00	45.00
Antenna gain (dBi)	30.60	30.60
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	130.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	4.68	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Horizontal	
Path length (mi)	3.59	
Free space loss (dB)	115.07	
Atmospheric absorption loss (dB)	0.04	
Net path loss (dB)	62.58	62.58
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	0.10	0.10
TX power (dBm)	20.00	20.00
EIRP (dBm)	45.72	46.80
Emission designator	800KD7W	800KD7W
TX Channels	1L 2310.4170H	1H 2355.4170H
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-42.58	-42.58
Thermal fade margin (dB)	39.42	39.42
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	39.42	39.42
C factor	6.00	
Fade occurrence factor (Po)	1.62E-03	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99998	99.99998
(sec)	0.49	0.49
Annual - multipath (%)	99.99999	99.99999
(sec)	2.05	2.05
(% - sec)	99.99999 - 4.10	

Mon, Dec 07 2009
PL10-SS91B.pl4
Reliability Method - Vigants - Barnett

	SP57/78B	SP-52-A
Elevation (ft)	0.00	0.00
Latitude	28 50 38.80 N	28 50 28.50 N
Longitude	089 23 47.10 W	089 08 22.46 W
True azimuth (°)	90.66	270.79
Vertical angle (°)	-0.09	-0.08
Antenna model	GHF6-23A	GHF6-23A
Antenna height (ft)	110.00	100.00
Antenna gain (dBi)	30.60	30.60
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	100.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	3.60	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Horizontal	
Path length (mi)	15.58	
Free space loss (dB)	127.81	
Atmospheric absorption loss (dB)	0.16	
Net path loss (dB)	74.36	74.36
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	0.50	0.50
TX power (dBm)	27.00	27.00
EIRP (dBm)	53.80	53.80
Emission designator	800KD7W	800KD7W
TX Channels	1L 2314.5830H	1H 2359.5830H
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-47.36	-47.36
Thermal fade margin (dB)	34.64	34.64
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	34.64	34.64
C factor	6.00	
Fade occurrence factor (Po)	1.32E-01	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99545	99.99545
(sec)	119.49	119.49
Annual - multipath (%)	99.99841	99.99841
(sec)	501.86	501.86
(% - sec)	99.99682 - 1003.71	

Fri, Dec 04 2009
SP5778B-SP52A.pl4
Reliability Method - Vigants - Barnett

	SP57/78B	SP-75-A
Elevation (ft)	0.00	0.00
Latitude	28 50 38.80 N	28 48 06.80 N
Longitude	089 23 47.10 W	089 17 59.10 W
True azimuth (°)	116.36	296.40
Vertical angle (°)	-0.04	-0.04
Antenna model	GHF6-23A	GHF6-23A
Antenna height (ft)	65.00	65.00
Antenna gain (dBi)	30.60	30.60
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	100.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	3.60	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Horizontal	
Path length (mi)	6.54	
Free space loss (dB)	120.28	
Atmospheric absorption loss (dB)	0.07	
Net path loss (dB)	66.74	66.74
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	0.50	0.50
TX power (dBm)	27.00	27.00
EIRP (dBm)	53.80	53.80
Emission designator	800KD7W	800KD7W
TX Channels	1L 2312.9170H	1H 2357.9170H
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-39.74	-39.74
Thermal fade margin (dB)	42.26	42.26
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	42.25	42.25
C factor	6.00	
Fade occurrence factor (Po)	9.81E-03	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99994	99.99994
(sec)	1.53	1.53
Annual - multipath (%)	99.99998	99.99998
(sec)	6.45	6.45
(% - sec)	99.99996 - 12.89	

Fri, Dec 04 2009
SP5778B-SP75-A.pl4
Reliability Method - Vigants - Barnett

	MP140B	MP-140A
Elevation (ft)	0.00	0.00
Latitude	29 17 44.70 N	29 17 37.93 N
Longitude	088 50 31.10 W	088 51 42.05 W
True azimuth (°)	263.79	83.78
Vertical angle (°)	-0.13	0.12
Antenna model	GHF6-23A	GHF6-23A
Antenna height (ft)	65.00	51.00
Antenna gain (dBi)	30.60	30.60
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	100.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	3.60	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Horizontal	
Path length (mi)	1.20	
Free space loss (dB)	105.52	
Atmospheric absorption loss (dB)	0.01	
Net path loss (dB)	51.93	51.93
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	0.10	0.10
TX power (dBm)	20.00	20.00
EIRP (dBm)	46.80	46.80
Emission designator	800KD7W	800KD7W
TX Channels	1L 2311.2500H	1H 2356.2500H
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-31.93	-31.93
Thermal fade margin (dB)	50.07	50.07
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	50.03	50.03
C factor	6.00	
Fade occurrence factor (Po)	6.00E-05	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	100.00000	100.00000
(sec)	1.57e-03	1.57e-03
Annual - multipath (%)	100.00000	100.00000
(sec)	6.58e-03	6.58e-03
(% - sec)	100.00000 - 0.01	

Fri, Dec 04 2009
MP140B-MP140A.pl4
Reliability Method - Vigants - Barnett

	WD90B	WD-105E
Elevation (ft)	0.00	0.00
Latitude	28 56 16.80 N	28 51 04.00 N
Longitude	089 39 35.20 W	089 36 03.00 W
True azimuth (°)	149.15	329.18
Vertical angle (°)	-0.05	-0.02
Antenna model	GHF6-23A	GHF6-23A
Antenna height (ft)	65.00	55.00
Antenna gain (dBi)	30.60	30.60
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	100.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	3.60	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Horizontal	
Path length (mi)	6.97	
Free space loss (dB)	120.82	
Atmospheric absorption loss (dB)	0.07	
Net path loss (dB)	67.29	67.29
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	0.50	0.50
TX power (dBm)	27.00	27.00
EIRP (dBm)	53.80	53.80
Emission designator	800KD7W	800KD7W
TX Channels	1H 2357.0830H	1L 2312.0830H
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-40.29	-40.29
Thermal fade margin (dB)	41.71	41.71
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	41.70	41.70
C factor	6.00	
Fade occurrence factor (Po)	1.18E-02	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99992	99.99992
(sec)	2.10	2.10
Annual - multipath (%)	99.99997	99.99997
(sec)	8.84	8.84
(% - sec)	99.99994 - 17.67	

Mon, Dec 07 2009
WD90B-WD105E.pl4
Reliability Method - Vigants - Barnett

	GI-43AA	WD-89
Elevation (ft)	0.00	0.00
Latitude	29 00 03.00 N	28 54 05.00 N
Longitude	089 51 31.00 W	089 36 52.00 W
True azimuth (°)	114.79	294.91
Vertical angle (°)	-0.07	-0.11
Antenna model	GHF8-23	GHF8-23
Antenna height (ft)	108.00	138.00
Antenna gain (dBi)	33.10	33.10
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	100.00	138.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	3.60	4.97
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Horizontal	
Path length (mi)	16.30	
Free space loss (dB)	128.20	
Atmospheric absorption loss (dB)	0.16	
Net path loss (dB)	71.13	71.13
Radio model	MDR-6702-8	MDR-6702-8
TX power (watts)	1.00	1.00
TX power (dBm)	30.00	30.00
EIRP (dBm)	59.30	57.93
Emission designator	2M50D7W	2M50D7W
TX Channels	1H 2352.5000H	1L 2307.5000H
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-79.00	-79.00
Maximum receive signal (dBm)	-10.00	-10.00
RX signal (dBm)	-41.13	-41.13
Thermal fade margin (dB)	37.87	37.87
Dispersive fade margin (dB)	68.00	68.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	37.86	37.86
C factor	6.00	
Fade occurrence factor (Po)	1.52E-01	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99752	99.99752
(sec)	65.12	65.12
Annual - multipath (%)	99.99913	99.99913
(sec)	273.50	273.50
(% - sec)	99.99827 - 547.00	

Fri, Dec 04 2009
GI-43AA-WD-89.pl4
Reliability Method - Vigants - Barnett

CONSENTS OF NW SPECTRUM CO. AND WCS WIRELESS LICENSE SUBSIDIARY, LLC

NextWave WIRELESS

February 16, 2010

Bruce Henoch
Vice President, Legal and Regulatory Affairs
Stratos Offshore Services Company
6550 Rock Spring Drive, Suite 650
Bethesda, Maryland 20817

Re: Temporary Use of WCS Spectrum in 12 Mile Coastal Zone
Under Call Sign KNLB215

Dear Mr. Henoch:

Stratos Offshore Services Company ("Stratos") has requested that NW Spectrum Co. ("NW Spectrum") consent to Stratos' use of NW Spectrum's WCS spectrum in the Gulf of Mexico under call sign KNLB215 on a temporary basis for a period of one hundred and eighty (180) days to permit the continued operation of links necessary for the monitoring and protection of its customers' offshore assets. NW Spectrum consents to such use, subject to the following conditions:

- The temporary facilities must comply with the Communications Act, the Code of Federal Regulations, and all other FCC rules applicable to use of the spectrum.
- The temporary facilities must operate under the specifications included in Attachment 1 hereto. NW Spectrum must be informed of any change from such specifications and approve such change in advance of its implementation.
- Temporary use of the WCS spectrum is subject to receipt by Stratos of an appropriate Special Temporary Authority ("STA") by the Federal Communications Commission, and such temporary use shall end when the 180 day STA term expires.
- Stratos will designate a contact person that will be available 24 hours each day, 7 days each week, during the period of time the temporary equipment is operational to allow NW Spectrum or its affiliates to report any interference to its operations associated with these licenses. Stratos shall also designate a back-up to be contacted by NW Spectrum if the primary contact is unavailable, Contact information for both persons will be delivered to NW Spectrum within ten (10) days of the date hereof, and shall include, at a minimum, the contact's name, title, company name, office telephone number, mobile telephone number, e-mail address, mailing address.

- If NW Spectrum or any of its affiliates report any interference, or if Stratos receives any information that its operations on the spectrum are suspected of or claimed to be causing interference to authorized spectrum users or otherwise not in compliance with FCC rules or the conditions of Stratos' STA, Stratos will immediately turn off the temporary equipment until the cause of the interference or noncompliance is resolved to NW Spectrum's satisfaction.
- Stratos agrees to indemnify NW Spectrum for any claims, expenses, liability, suits or damages arising out of or relating to Stratos' actions or omissions associated with its activities in using the spectrum.
- If either or both of the licenses is revoked, cancelled, terminated or otherwise ceases to be in effect, Stratos shall have no continuing authority or right to use the spectrum unless otherwise authorized by the FCC.
- This arrangement is not an assignment, sale or transfer of the Licenses.

If you have any questions or require additional information, please contact me via the letterhead information.

Regards,

Francis J. Harding
Executive VP CFO
NextWave Wireless, Inc.

NextWave BROADBAND

February 16, 2010

Bruce Henoch
Vice President, Legal and Regulatory Affairs
Stratos Offshore Services Company
6550 Rock Spring Drive, Suite 650
Bethesda, Maryland 20817

Re: Temporary Use of WCS Spectrum in 12 Mile Coastal Zone
Under Call Signs KNLB298 and KNLB299

Dear Mr. Henoch:

Stratos Offshore Services Company ("Stratos") has requested that WCS Wireless License Subsidiary, LLC ("WCS Wireless") consent to Stratos' use of WCS Wireless' WCS spectrum in the Gulf of Mexico under call signs KNLB298 and KNLB299 on a temporary basis for a period of one hundred and eighty (180) days to permit the continued operation of links necessary for the monitoring and protection of its customers' offshore assets. WCS Wireless consents to such use, subject to the following conditions:

- The temporary facilities must comply with the Communications Act, the Code of Federal Regulations, and all other FCC rules applicable to use of the spectrum.
- The temporary facilities must operate under the specifications included in Attachment 1 hereto. WCS Wireless must be informed of any change from such specifications and approve such change in advance of its implementation.
- Temporary use of the WCS spectrum is subject to receipt by Stratos of an appropriate Special Temporary Authority ("STA") by the Federal Communications Commission, and such temporary use shall end when the 180 day STA term expires.
- Stratos will designate a contact person that will be available 24 hours each day, 7 days each week, during the period of time the temporary equipment is operational to allow WCS Wireless or its affiliates to report any interference to its operations associated with these licenses. Stratos shall also designate a back-up to be contacted by WCS Wireless if the primary contact is unavailable. Contact information for both persons will be delivered to WCS Wireless within ten (10) days of the date hereof, and shall include, at a minimum, the contact's name, title, company name, office telephone number, mobile telephone number, e-mail address, mailing address.
- If WCS Wireless or any of its affiliates report any interference, or if Stratos receives any information that its operations on the spectrum are suspected of or claimed to be causing interference to authorized spectrum users or otherwise not in compliance with FCC rules or the conditions of Stratos' STA, Stratos will immediately turn off the temporary equipment until the cause of the interference or noncompliance is resolved to WCS Wireless' satisfaction.

- Stratos agrees to indemnify WCS Wireless for any claims, expenses, liability, suits or damages arising out of or relating to Stratos' actions or omissions associated with its activities in using the spectrum.
- If either or both of the licenses is revoked, cancelled, terminated or otherwise ceases to be in effect, Stratos shall have no continuing authority or right to use the spectrum unless otherwise authorized by the FCC.
- This arrangement is not an assignment, sale or transfer of the Licenses.

If you have any questions or require additional information, please contact me via the letterhead information.

Regards,

Francis J. Harding
Executive VP CFO
NextWave Wireless, Inc.

ATTACHMENT 1

	MI-703	MI-696
Elevation (ft)	0.00	0.00
Latitude	27 53 44.00 N	27 53 09.40 N
Longitude	096 25 40.75 W	096 44 38.20 W
True azimuth (°)	268.11	87.97
Vertical angle (°)	-0.16	-0.05
Antenna model	GHF10-23A	GHF10-23A
Antenna height (ft)	185.00	95.00
Antenna gain (dBi)	35.00	35.00
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	185.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	6.66	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Vertical	
Path length (mi)	19.34	
Free space loss (dB)	129.69	
Atmospheric absorption loss (dB)	0.19	
Net path loss (dB)	70.54	70.54
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	1.00	1.00
TX power (dBm)	30.00	30.00
EIRP (dBm)	58.14	61.20
Emission designator	800KD7W	800KD7W
TX Channels	1L 2311.2500V	1H 2356.2500V
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-40.54	-40.54
Thermal fade margin (dB)	41.46	41.46
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	41.45	41.45
C factor	6.00	
Fade occurrence factor (Po)	2.53E-01	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99819	99.99819
(sec)	47.62	47.62
Annual - multipath (%)	99.99937	99.99937
(sec)	200.02	200.02
(% - sec)	99.99873 - 400.03	

Fri, Dec 04 2009
MAT703-MI696.pl4
Reliability Method - Vigants - Barnett

	BA451	BAA19
Elevation (ft)	0.00	0.00
Latitude	28 29 37.90 N	28 10 51.00 N
Longitude	095 43 28.80 W	095 35 12.80 W
True azimuth (°)	158.69	338.76
Vertical angle (°)	-0.10	-0.15
Antenna model	GHF8-23A	GHF6-23A
Antenna height (ft)	145.00	195.00
Antenna gain (dBi)	33.10	30.60
TX line type	LDF5-50A	LDF5-50A
TX line length (ft)	200.00	250.00
TX line unit loss (dB /100 ft)	2.07	2.07
TX line loss (dB)	4.15	5.18
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Vertical	
Path length (mi)	23.13	
Free space loss (dB)	131.24	
Atmospheric absorption loss (dB)	0.23	
Net path loss (dB)	77.50	77.50
Radio model	XE2000_500K_64Q	XE2000_500K_64Q
TX power (watts)	0.79	0.79
TX power (dBm)	29.00	29.00
EIRP (dBm)	57.75	54.22
Emission designator	500K0D7WEN	500K0D7WEN
TX Channels	1H 2347.5000V	1L 2315.5000V
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-87.00	-87.00
Maximum receive signal (dBm)	-10.00	-10.00
RX signal (dBm)	-48.50	-48.50
Thermal fade margin (dB)	38.50	38.50
Dispersive fade margin (dB)	118.00	118.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	38.50	38.50
C factor	6.00	
Fade occurrence factor (Po)	4.33E-01	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99388	99.99388
(sec)	160.86	160.86
Annual - multipath (%)	99.99786	99.99786
(sec)	675.61	675.61
(% - sec)	99.99572 - 1351.22	

Fri, Dec 04 2009
BA451-BAA19.pl4
Reliability Method - Vigants - Barnett

CONSENT OF UNRESTRICTED SUBSIDIARY FUNDING COMPANY

Sprint
Together with Nextel

Sprint Nextel Corporation
6200 Sprint Parkway
Overland Park, Kansas 66251
Office: (913) 794-1324

Shawn Perkins
Director

February 15, 2010

Bruce Henoch
Vice President, Legal and Regulatory Affairs
Stratos Offshore Services Company
6550 Rock Spring Drive, Suite 650
Bethesda, Maryland 20817

Re: Temporary Use of WCS Spectrum in 12 Mile Coastal Zone
Under Call Sign WPSL356

Dear Mr. Henoch:

Stratos Offshore Services Company ("Stratos") has requested that Unrestricted Subsidiary Funding Company, an indirect wholly-owned subsidiary of Sprint Nextel Corp. ("Sprint"), consent to Stratos' use of Sprint's WCS spectrum in the Gulf of Mexico under call sign WPSL356 on a temporary basis for a period of one hundred and eighty (180) days to permit the continued operation of links necessary for the monitoring and protection of its customers' offshore assets. Sprint consents to such use, subject to the following conditions:

- The temporary facilities must comply with the Communications Act, the Code of Federal Regulations, and all other FCC rules applicable to use of the spectrum.
- The temporary facilities must operate under the specifications included in Attachment 1 hereto. Sprint must be informed of any change from such specifications and approve such change in advance of its implementation.
- Temporary use of the WCS spectrum is subject to receipt by Stratos of an appropriate Special Temporary Authority ("STA") by the Federal Communications Commission, and such temporary use shall end when the 180 day STA term expires.
- Stratos will designate a contact person that will be available 24 hours each day, 7 days each week, during the period of time the temporary equipment is operational to allow Sprint or its affiliates to report any interference to its operations associated with these licenses. Stratos shall also designate a back-up to be contacted by WCS Wireless if the primary contact is unavailable. Contact information for both persons will be delivered to Sprint within ten (10) days of the date hereof, and shall include, at a minimum, the contact's name, title, company name, office telephone number, mobile telephone number, e-mail address, mailing address.
- If Sprint or any of its affiliates report any interference, or if Stratos receives any information that its operations on the spectrum are suspected of or claimed to be causing interference to authorized spectrum users or otherwise not in compliance with FCC rules or the conditions of Stratos' STA, Stratos will immediately turn off the temporary equipment until the cause of the interference or noncompliance is resolved to Sprint's satisfaction.
- Stratos agrees to indemnify Sprint for any claims, expenses, liability, suits or damages arising out of or relating to Stratos' actions or omissions associated with its activities in using the spectrum.
- If the license for WPSL356 is revoked, cancelled, terminated or otherwise ceases to be in effect, Stratos shall have no continuing authority or right to use the spectrum unless otherwise authorized by the FCC.
- This arrangement is not an assignment, sale or transfer of the license for WPSL356.

If you have any questions or require additional information, please contact me via the letterhead information.

Regards,

Shawn Perkins

Attachment

ATTACHMENT 1

	PL10	PL-2JA
Elevation (ft)	0.00	0.00
Latitude	28 56 53.00 N	29 00 27.00 N
Longitude	090 43 26.00 W	090 39 26.00 W
True azimuth (°)	44.58	224.62
Vertical angle (°)	-0.04	-0.03
Antenna model	GHF6-23A	GHF6-23A
Antenna height (ft)	65.00	63.00
Antenna gain (dBi)	30.60	30.60
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	100.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	3.60	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Horizontal	
Path length (mi)	5.75	
Free space loss (dB)	119.15	
Atmospheric absorption loss (dB)	0.06	
Net path loss (dB)	65.61	65.61
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	0.50	0.50
TX power (dBm)	27.00	27.00
EIRP (dBm)	53.80	53.80
Emission designator	800KD7W	800KD7W
TX Channels	1L 2311.2500H	1H 2356.2500H
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-38.61	-38.61
Thermal fade margin (dB)	43.39	43.39
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	43.38	43.38
C factor	6.00	
Fade occurrence factor (Po)	6.65E-03	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99997	99.99997
(sec)	0.80	0.80
Annual - multipath (%)	99.99999	99.99999
(sec)	3.37	3.37
(% - sec)	99.99998 - 6.74	

Fri, Dec 04 2009
PL10-PL2JA.pl4
Reliability Method - Vigants - Barnett

	PL10	SS-91B
Elevation (ft)	0.00	0.00
Latitude	28 56 53.00 N	28 55 07.65 N
Longitude	090 43 26.00 W	090 46 22.70 W
True azimuth (°)	235.88	55.86
Vertical angle (°)	-0.28	0.24
Antenna model	GHF6-23A	GHF6-23A
Antenna height (ft)	130.00	45.00
Antenna gain (dBi)	30.60	30.60
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	130.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	4.68	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Horizontal	
Path length (mi)	3.59	
Free space loss (dB)	115.07	
Atmospheric absorption loss (dB)	0.04	
Net path loss (dB)	62.58	62.58
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	0.10	0.10
TX power (dBm)	20.00	20.00
EIRP (dBm)	45.72	46.80
Emission designator	800KD7W	800KD7W
TX Channels	1L 2310.4170H	1H 2355.4170H
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-42.58	-42.58
Thermal fade margin (dB)	39.42	39.42
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	39.42	39.42
C factor	6.00	
Fade occurrence factor (Po)	1.62E-03	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99998	99.99998
(sec)	0.49	0.49
Annual - multipath (%)	99.99999	99.99999
(sec)	2.05	2.05
(% - sec)	99.99999 - 4.10	

Mon, Dec 07 2009
PL10-SS91B.pl4
Reliability Method - Vigants - Barnett

	SP57/78B	SP-52-A
Elevation (ft)	0.00	0.00
Latitude	28 50 38.80 N	28 50 28.50 N
Longitude	089 23 47.10 W	089 08 22.46 W
True azimuth (°)	90.66	270.79
Vertical angle (°)	-0.09	-0.08
Antenna model	GHF6-23A	GHF6-23A
Antenna height (ft)	110.00	100.00
Antenna gain (dBi)	30.60	30.60
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	100.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	3.60	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Horizontal	
Path length (mi)	15.58	
Free space loss (dB)	127.81	
Atmospheric absorption loss (dB)	0.16	
Net path loss (dB)	74.36	74.36
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	0.50	0.50
TX power (dBm)	27.00	27.00
EIRP (dBm)	53.80	53.80
Emission designator	800KD7W	600KD7W
TX Channels	1L 2314.5830H	1H 2359.5830H
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-47.36	-47.36
Thermal fade margin (dB)	34.64	34.64
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	34.64	34.64
C factor	6.00	
Fade occurrence factor (Po)	1.32E-01	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99545	99.99545
(sec)	119.49	119.49
Annual - multipath (%)	99.99841	99.99841
(sec)	501.86	501.86
(% - sec)	99.99682 - 1003.71	

Fri, Dec 04 2009
SP5778B-SP52A.pl4
Reliability Method - Vigants - Barnett

	SP57/78B	SP-75-A
Elevation (ft)	0.00	0.00
Latitude	28 50 38.80 N	28 48 06.80 N
Longitude	089 23 47.10 W	089 17 59.10 W
True azimuth (°)	116.36	296.40
Vertical angle (°)	-0.04	-0.04
Antenna model	GHF6-23A	GHF6-23A
Antenna height (ft)	65.00	65.00
Antenna gain (dBi)	30.60	30.60
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	100.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	3.60	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Horizontal	
Path length (mi)	6.54	
Free space loss (dB)	120.28	
Atmospheric absorption loss (dB)	0.07	
Net path loss (dB)	66.74	66.74
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	0.50	0.50
TX power (dBm)	27.00	27.00
EIRP (dBm)	53.80	53.80
Emission designator	800KD7W	800KD7W
TX Channels	1L 2312.9170H	1H 2357.9170H
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-39.74	-39.74
Thermal fade margin (dB)	42.26	42.26
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	42.25	42.25
C factor	6.00	
Fade occurrence factor (Po)	9.81E-03	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99994	99.99994
(sec)	1.53	1.53
Annual - multipath (%)	99.99998	99.99998
(sec)	6.45	6.45
(% - sec)	99.99996 - 12.89	

Fri, Dec 04 2009
SP5778B-SP75-A.pl4
Reliability Method - Vigants - Barnett

	MP140B	MP-140A
Elevation (ft)	0.00	0.00
Latitude	29 17 44.70 N	29 17 37.93 N
Longitude	088 50 31.10 W	088 51 42.05 W
True azimuth (°)	263.79	83.78
Vertical angle (°)	-0.13	0.12
Antenna model	GHF6-23A	GHF6-23A
Antenna height (ft)	65.00	51.00
Antenna gain (dBi)	30.60	30.60
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	100.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	3.60	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Horizontal	
Path length (mi)	1.20	
Free space loss (dB)	105.52	
Atmospheric absorption loss (dB)	0.01	
Net path loss (dB)	51.93	51.93
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	0.10	0.10
TX power (dBm)	20.00	20.00
EIRP (dBm)	46.80	46.80
Emission designator	800KD7W	800KD7W
TX Channels	1L 2311.2500H	1H 2356.2500H
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-31.93	-31.93
Thermal fade margin (dB)	50.07	50.07
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	50.03	50.03
C factor	6.00	
Fade occurrence factor (Po)	6.00E-05	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	100.00000	100.00000
(sec)	1.57e-03	1.57e-03
Annual - multipath (%)	100.00000	100.00000
(sec)	6.58e-03	6.58e-03
(% - sec)	100.00000 - 0.01	

Fri, Dec 04 2009
MP140B-MP140A.pl4
Reliability Method - Vigants - Barnett

	WD90B	WD-105E
Elevation (ft)	0.00	0.00
Latitude	28 56 16.80 N	28 51 04.00 N
Longitude	089 39 35.20 W	089 36 03.00 W
True azimuth (°)	149.15	329.18
Vertical angle (°)	-0.05	-0.02
Antenna model	GHF6-23A	GHF6-23A
Antenna height (ft)	65.00	55.00
Antenna gain (dBi)	30.60	30.60
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	100.00	100.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	3.60	3.60
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Horizontal	
Path length (mi)	6.97	
Free space loss (dB)	120.82	
Atmospheric absorption loss (dB)	0.07	
Net path loss (dB)	67.29	67.29
Radio model	MDR-8702-2W	MDR-8702-2W
TX power (watts)	0.50	0.50
TX power (dBm)	27.00	27.00
EIRP (dBm)	53.80	53.80
Emission designator	800KD7W	800KD7W
TX Channels	1H 2357.0830H	1L 2312.0830H
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-82.00	-82.00
Maximum receive signal (dBm)	-17.00	-17.00
RX signal (dBm)	-40.29	-40.29
Thermal fade margin (dB)	41.71	41.71
Dispersive fade margin (dB)	70.00	70.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	41.70	41.70
C factor	6.00	
Fade occurrence factor (Po)	1.18E-02	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99992	99.99992
(sec)	2.10	2.10
Annual - multipath (%)	99.99997	99.99997
(sec)	8.84	8.84
(% - sec)	99.99994 - 17.67	

Mon, Dec 07 2009
WD90B-WD105E.pl4
Reliability Method - Vigants - Barnett

	GI-43AA	WD-89
Elevation (ft)	0.00	0.00
Latitude	29 00 03.00 N	28 54 05.00 N
Longitude	089 51 31.00 W	089 36 52.00 W
True azimuth (°)	114.79	294.91
Vertical angle (°)	-0.07	-0.11
Antenna model	GHF8-23	GHF8-23
Antenna height (ft)	108.00	138.00
Antenna gain (dBi)	33.10	33.10
TX line type	LDF4-50A	LDF4-50A
TX line length (ft)	100.00	138.00
TX line unit loss (dB /100 ft)	3.60	3.60
TX line loss (dB)	3.60	4.97
Connector loss (dB)	0.20	0.20
Frequency (MHz)	2333.00	
Polarization	Horizontal	
Path length (mi)	16.30	
Free space loss (dB)	128.20	
Atmospheric absorption loss (dB)	0.16	
Net path loss (dB)	71.13	71.13
Radio model	MDR-6702-8	MDR-6702-8
TX power (watts)	1.00	1.00
TX power (dBm)	30.00	30.00
EIRP (dBm)	59.30	57.93
Emission designator	2M50D7W	2M50D7W
TX Channels	1H 2352.5000H	1L 2307.5000H
RX threshold criteria	BER 10-6	BER 10-6
RX threshold level (dBm)	-79.00	-79.00
Maximum receive signal (dBm)	-10.00	-10.00
RX signal (dBm)	-41.13	-41.13
Thermal fade margin (dB)	37.87	37.87
Dispersive fade margin (dB)	68.00	68.00
Dispersive fade occurrence factor	1.00	
Effective fade margin (dB)	37.86	37.86
C factor	6.00	
Fade occurrence factor (Po)	1.52E-01	
Average annual temperature (°F)	70.00	
Worst month - multipath (%)	99.99752	99.99752
(sec)	65.12	65.12
Annual - multipath (%)	99.99913	99.99913
(sec)	273.50	273.50
(% - sec)	99.99827 - 547.00	

Fri, Dec 04 2009
GI-43AA-WD-89.pl4
Reliability Method - Vigants - Barnett