

Exhibit I

Response to Application Item 34 (Foreign Ownership)

Pursuant to Section 310(b)(4) of the Communications Act of 1934, as amended, 47 U.S.C. § 310(b)(4), Applicant hereby requests a determination that the public interest would not be served by prohibiting the indirect foreign ownership of Applicant in excess of the 25% benchmark.

Factual Background.

Applicant is wholly owned by Thrane & Thrane US Holdings Ltd. ("T&T US Holdings"), a Delaware corporation located at 509 Viking Drive, Suites K, L & M, Virginia Beach, Virginia 23452. T&T US Holdings, in turn, is a wholly owned subsidiary of Thrane & Thrane Airtime A/S, a Danish company, located at Lundtoftegardsvej 93 D, DK-2800 Kgs. Lyngby, Denmark. Thrane & Thrane Airtime A/S, in turn, is a wholly owned subsidiary of Thrane & Thrane A/S ("Thrane & Thrane"), a Danish company located at Lundtoftegardsvej 93 D, DK-2800 Kgs. Lyngby, Denmark.

Thrane & Thrane is one of the world's leading manufacturers of terminals and land earth stations for global mobile satellite communication. Since its incorporation in 1981, the company has established a strong position within global mobile satellite services based on the Inmarsat system, and today it provides equipment for land-based, maritime and aeronautical use. Further information about Thrane & Thrane can be found at: www.tt.dk.

Thrane & Thrane is a publicly traded corporation organized under the laws of the Kingdom of Denmark. The company's shares are listed on the Copenhagen Stock Exchange, and no shares confer any special rights upon any shareholder. Thrane & Thrane presently has over 1800 shareholders, but only four shareholders hold more than 5% of the company's stock. Lars Thrane, company co-founder, holds a 27% ownership interest in the company. Lars Thrane is a citizen of the Kingdom of Denmark. The business address of Lars Thrane is the same as the company – Lundtoftegardsvej 93 D, DK-2800 Kgs. Lyngby, Denmark. Lars Thrane is president of Thrane & Thrane A/S and a member of the company's Board of Directors. The remaining shareholders holding more than 5% of the company's stock are institutional investors. These are: Schroder Investment Management Limited (UK), which held 6.1% of the company's shares as of February 17, 2004, Fåmandsforeningen LD, which held 7% of the company's shares as of September 9, 2005, and PKA A/S, which held 5.13% of the company's shares as of December 21, 2005.

Thrane & Thrane A/S is also the parent company of Thrane & Thrane, Inc., a Delaware corporation which holds authority under Section 214 of the Communications Act of 1934, as amended, to serve as an Inmarsat Point of Service Activation for the United States and provide airtime to all International Points on a reseller basis in accordance with Section 63.18(e)(3) of the rules. See File No. ITC-214-20030424-00203. Thrane & Thrane Inc. is regulated as a non-dominant carrier, and in 2003, in connection with its acquisition of LandSea Systems, its

predecessor-in-interest, voluntarily accepted conditions to its authorization requested by Executive Branch agencies to address national security, law enforcement and public safety issues.

Henrik Lunde, a director of Thrane & Thrane Airtime Ltd., is also a director of Thrane & Thrane, Inc. Mr. Lunde, Chief Executive Officer of Thrane & Thrane A/S (a non-carrier) is a citizen of the Kingdom of Denmark.

Denmark, the country where Thrane & Thrane, Applicant's ultimate parent corporation is organized and headquartered, is a WTO Member country.

Legal Framework.

The Commission considers the indirect foreign ownership of common carrier Title III license applicants pursuant to its public interest analysis under Section 310(b)(4) of the Act and the Commission's foreign ownership policies adopted in its *Foreign Participation Order*.¹ As part of that analysis, the Commission considers any national security, law enforcement, foreign policy or trade policy concerns raised by the indirect foreign investment.²

Section 310(b)(4) of the Act establishes a 25% benchmark for investment by foreign individuals, corporations and governments in entities that control U.S. common carrier radio licensees. The section also grants the Commission discretion to allow higher levels of foreign ownership if it determines that such ownership is not inconsistent with the public interest. Thus, as the Commission has noted, "a foreign government, individual, or corporation may own, directly or indirectly, up to 100 percent of the stock of a U.S. holding company that holds a controlling interest in a common carrier or aeronautical radio licensee provided the Commission does not find the foreign ownership to be inconsistent with the public interest."³

In the Foreign Participation Order, the Commission unanimously concluded that the public interest would be served by permitting greater investment by individuals and entities from WTO Member countries in U.S. common carrier and aeronautical radio licenses. Accordingly, it afforded a rebuttable presumption by which the Commission presumes that foreign investment from WTO Member countries does not pose competitive concerns in the U.S. market.

Analysis.

In the instant case, Applicant respectfully submits that, pursuant to the above legal framework, the Commission should determine that the public interest would not be served by prohibiting the indirect foreign ownership of Applicant in excess of the 25% benchmark.⁴ As

¹ *Rules and Policies on Foreign Participation in the U.S. Telecommunications Market*, Report and Order and Order on Reconsideration, FCC 97-398, 12 FCC Rcd 23891 (1997) ("*Foreign Participation Order*"), Order on Reconsideration, FCC 00-339, 15 FCC Rcd 18158 (2000).

² *See, e.g., Petition of TelCove, Inc. for a Declaratory Ruling Pursuant to Section 310(b)(4) of the Communications Act of 1934, as amended*, DA 06-860, released April 14, 2006 ("*TelCove*").

³ "Foreign Ownership Guidelines For FCC Common Carrier and Aeronautical Radio Licenses," DA 04-3610 (International Bureau, November 17, 2004), p. 10.

⁴ In the instant case, the indirect foreign ownership of Applicant would exceed the 25% benchmark for both equity and voting interests, since Thrane & Thrane Airtime A/S, a Danish company, owns 100% of Applicant's US

noted above, all foreign equity and voting interests are held by an entity is headquartered, and has its principal place of business in Denmark, a WTO Member country. Accordingly, Applicant is entitled to a rebuttable presumption that its indirect foreign ownership would not pose a risk to competition in the US market, and there is no evidence to rebut this presumption. As noted also, Applicant's affiliate, Thrane & Thrane, Inc., has operated as a non-dominant common carrier, pursuant to Section 214 authorization, since 2003, and has voluntarily accepted conditions to its authorization requested by Executive Branch agencies to address national security, law enforcement and public safety issues. Against this background, consistent with applicable Commission precedent, Applicant respectfully submits that it would not serve the public interest to prohibit the indirect foreign ownership described herein.⁵

holding company parent Thrane & Thrane US Holdings Ltd., and controls all voting interests of Thrane & Thrane US Holdings Ltd.

⁵ See, e.g., *TelCove, supra*; *Vodafone Americas Asia Inc.*, DA 02-1557, released July 1, 2002; *Intelsat, Ltd.*, DA 04-0434, released December 22, 2004.