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

In re Application of)
Stratos Offshore Services Company)) File No. ISP-PDR-20090818-00006
)
Petition for Declaratory Ruling Under Section)
310(b)(4) of the Communications Act of 1934,)
as Amended	

To: The Commission

SUPPLEMENT TO PETITION FOR DECLARATORY RULING

Stratos Offshore Services Company ("Stratos Offshore") respectfully submits this supplement to its Petition for Declaratory Ruling (the "Petition"), pursuant to Section 310(b)(4) of the Communications Act, as amended (the "Act"). Stratos Offshore submitted the Petition on August 18, 2009, in connection with its then-upcoming participation in FCC Auction No. 86 (the "BRS Auction"). Stratos Offshore requested that the Commission confirm that its prior approval¹ of the indirect foreign ownership of Stratos Offshore and its sister company Stratos Communications Inc. pursuant to Section 310(b)(4) would apply to any Broadband Radio Service ("BRS") licenses that Stratos Offshore acquired.

Stratos Offshore hereby supplements its Petition to reflect that the BRS Auction has closed, and that Stratos Offshore submitted winning bids on two licenses – Gulf of Mexico Zone A (BTA 494) and Gulf of Mexico Zone B (BTA495).

¹ Robert M. Franklin, Transferor and Inmarsat, PLC, Transferee, Consolidated Application for Consent to Transfer of Control of Stratos Global Corporation and Its Subsidiaries from an Irrevocable Trust to Inmarsat, plc, Memorandum Opinion and Order and Declaratory Ruling, 24 FCC Rcd 449 (IB 2009) ("Inmarsat Transfer Order").

Stratos Offshore also confirms for the Commission that there has been no change in the identity and principal place of business of each intermediate company in the ownership chain between Stratos Offshore and its ultimate parent company, Inmarsat plc. Moreover, there is no new or increased indirect foreign ownership in Stratos Offshore requiring additional Commission approval in connection with the BRS licenses on which Stratos Offshore placed winning bids in the BRS Auction. Thus, to the extent Stratos Offshore uses the subject BRS licenses for common carrier purposes, its indirect foreign ownership is within the scope of the Commission's prior approval.

Conclusion

For the reasons stated herein and in the Petition, Stratos Offshore respectfully requests that the Commission extend its prior approval of Stratos Offshore's indirect foreign ownership to the subject BRS licenses.

Respectfully submitted,

STRATOS OFFSHORE SERVICES COMPANY

/s/

By:

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November 20, 2009