

**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”).*

