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February 18, 2013

Via IBFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Re: IBFS File No. ISP-PDR-20130815-00004

Dear Ms. Dortch:

RigNet SatCom, Inc. (“RigNet”) submits this letter in connection with above-referenced proceeding to respond to Staff’s clarification requests about the upstream ownership of Digital Oilfield Investment LP (“Digital”). An updated description of Digital’s upstream ownership is attached as Attachment 1. A copy of the structure chart submitted to the Commission in this proceeding on October 23, 2013, is also attached to Attachment 1 as Exhibit A.

This letter is being filed via IBFS in the above-referenced docket number. Please contact the undersigned if you have any questions concerning this filing.

Respectfully submitted,

/s/ Catherine Wang

Catherine Wang
Danielle Burt

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ATTACHMENT 1

Digital Oilfield Investment LP, a Cayman Islands exempted limited partnership (“Digital”), holds an approximate 28.2 percent interest in RigNet, Inc. RigNet, Inc., a publicly held Delaware corporation, owns 100 percent of the outstanding shares of RigNet SatCom, Inc.

Digital Oilfield Investments GP Limited, a Cayman Islands exempted company (“Digital GP”), is the general partner of Digital.

KKR European Fund III, Limited Partnership, a Cayman Islands exempted limited partnership, is the sole member of Digital GP and also has an approximately 93.99 percent limited partnership interest in Digital. Approximately 62 percent of the capital contributed to KKR European Fund III by its limited partners is derived from non-U.S. entities,¹ while the remainder is provided by U.S. entities. The limited partners of KKR European Fund III, Limited Partnership are insulated in accordance with section 1.993(a) of the Commission’s rules and no limited partner holds, directly or indirectly, a 10% or greater equity and/or voting interest in Rignet, Inc.²

KKR Partners II (International), L.P. (“KKR Partners II”), a Cayman Islands exempted limited partnership, will have an approximately 6.01 percent direct limited partnership interest in Digital. KKR Partners II is insulated in accordance with section 1.993(a) of the

¹ The non-U.S. investment in KKR European Fund III, Limited Partnership comes from the British Virgin Islands, Canada, Cayman Islands, Finland, Germany, Ireland, Japan, Jersey (Channel Islands), Republic of Korea, Scotland, Singapore, Sultanate of Oman, Switzerland, The Netherlands, and the United Kingdom.

² Pursuant to the *Second Report and Order* the voting interest of insulated limited partners is calculated as equal to their equity interest in Rignet, Inc. See *Review of Foreign Ownership Policies for Common Carrier and Aeronautical Radio Licenses under Section 310(b)(4) of the Communications Act of 1934, as Amended*, IB Docket No. 11-133, Second Report and Order (rel. Apr. 18, 2013) at ¶120.

Commission's rules. The petition for declaratory ruling does not request specific approval for KKR Partners II (International), L.P.

KKR Associates Europe III, Limited Partnership, a Cayman Islands exempted limited partnership, is the general partner of KKR European Fund III, Limited Partnership. The limited partners of KKR Associates Europe III, Limited Partnership are insulated in accordance with section 1.993(a) of the Commission's rules and no limited partner holds, directly or indirectly, a 10% or greater equity and/or voting interest in Rignet, Inc.

KKR Europe III Limited, a Cayman Islands exempted company, is the general partner of KKR Associates Europe III, Limited Partnership.

KKR Fund Holdings L.P., a Cayman Islands exempted limited partnership, is the sole member of KKR Europe III Limited. The limited partners of KKR Fund Holdings L.P. are insulated in accordance with section 1.993(a) of the Commission's rules and no limited partner holds, directly or indirectly, a 10% or greater equity and/or voting interest in Rignet, Inc.

KKR Fund Holdings GP Limited, a Cayman Islands exempted company, and **KKR Group Holdings L.P.**, a Cayman Islands exempted limited partnership, are the general partners of KKR Fund Holdings L.P. The limited partners of KKR Group Holdings L.P. are insulated in accordance with section 1.993(a) of the Commission's rules and no limited partner holds, directly or indirectly, a 10% or greater equity and/or voting interest in Rignet, Inc. KKR Group Holdings L.P. is also the sole shareholder of KKR Fund Holdings GP Limited.

KKR Group Limited, a Cayman Islands exempted company, is the general partner of KKR Group Holdings L.P.

KKR & Co. L.P. (“KKR”), a Delaware limited partnership listed on the New York Stock Exchange, is the sole shareholder of KKR Group Limited. The limited partners of KKR are insulated in accordance with section 1.993(a) of the Commission’s rules and no limited partner holds, directly or indirectly, a 10% or greater equity and/or voting interest in Rignet, Inc.

KKR Management LLC, a Delaware limited liability company, is the general partner of KKR. KKR Management LLC does not hold any economic interests in KKR and is owned by senior KKR principals. The designated members of KKR Management LLC are Henry R. Kravis and George R. Roberts, both U.S. citizens, and, as designated members, Messrs. Kravis and Roberts are, when acting together, deemed to represent a majority of the Class A shares then outstanding for purposes of voting on matters upon which holders of Class A shares are entitled to vote. The remaining members of KKR Management LLC are insulated in accordance with section 1.993(a) of the Commission’s rules and do not hold, directly or indirectly, a 10 percent or greater equity and/or voting interest in Rignet, Inc.³

Exhibit A contains a chart of RigNet’s ownership and control structure as it relates to KKR.

³ It should be noted that certain of the insulated members of KKR Management are non-U.S. citizens.

EXHIBIT A

RigNet Ownership and Control Structure

