



September 19, 2019

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Attn: Chief, International Bureau

**Re: Second Supplement to**

**Petition for Declaratory Ruling Under Section 310(b)(4) of the  
Communications Act of 1934, as amended, of Inmarsat plc, Inmarsat  
Solutions (US) Inc., ISAT US Inc. and Connect Bidco Limited  
IB File No. ISP-PDR-20190528-00003, IB Docket No. 19-216**

Dear Ms. Dortch:

Connect Bidco Limited (“Connect Bidco” or “Petitioner”), by undersigned counsel, hereby submits this second supplement to the above-referenced Petition for Declaratory Ruling (the “Petition”).

The Petition was filed on May 28, 2019, and Connect Bidco submitted a revised version of and a supplement to the Petition on July 9, 2019 (respectively, the “Revised Petition” and the “Supplement”) requesting that the Federal Communications Commission (“FCC” or “Commission”) find that the indirect foreign ownership of 100 percent of Inmarsat plc, a public limited company incorporated under the laws of England and Wales (“Inmarsat”) and any of its subsidiaries and affiliates, whether currently existing or subsequently formed or acquired, by Connect Bidco that will result from the consummation of the transaction described in the pending transfer of control applications<sup>1</sup> is consistent with the public interest standard under Section 310(b)(4) of the Communications Act of 1934, as amended (the “Act”).

<sup>1</sup> The parties also have filed the following applications: Application for Consent to transfer of control of common carrier earth station licensee Inmarsat Solutions (US) Inc. from Inmarsat plc to Connect Bidco Limited, IB File No. SES-T/C-20190603-00672; Application for Consent to transfer of control of common carrier earth station licensee ISAT US Inc. from Inmarsat plc to Connect Bidco Limited, IB File No. SES-T/C-20190603-00673; Application for Consent to transfer of control of non-common carrier earth station licensee ISAT US Inc. from Inmarsat plc to Connect Bidco Limited, IB File No. SES-T/C-20190603-00674; Application for Consent to transfer of control of non-common carrier earth station licensee Inmarsat Inc. from Inmarsat plc to Connect Bidco Limited, IB File No. SES-T/C-20190603-00675; and Application for Consent to transfer of control of common carrier earth station licensee Inmarsat Inc. from Inmarsat plc to Connect Bidco Limited, IB File No. SES-T/C-20190603-00676.

In the Revised Petition and Supplement, Connect Bidco responded to certain questions raised by Commission staff, including requests to provide additional information regarding the ownership structure of Triton LuxTopHolding SARL (“Triton LuxTop”), a Luxembourg limited company owned by several limited partnerships that comprise the Apax IX fund and that are ultimately controlled by The Hirzel IV Purpose Trust. Among other things, Connect Bidco (i) confirmed that A9 USD Founder L.P. holds an insulated limited partnership interest in Apax IX USD L.P. and that A9 EUR Founder L.P. holds an insulated limited partnership interest in Apax IX EUR L.P., and (ii) sought specific approval for certain individuals holding limited partnership interests in those entities.<sup>2</sup>

In addition to the individuals and entities previously disclosed in the Revised Petition and Supplement, Connect Bidco hereby supplements the Revised Petition to seek specific approval for an additional individual, Andrew Sillitoe, who holds limited partnership interests in A9 EUR Founder L.P. and A9 USD Founder L.P. Specific approval is sought because it is anticipated that Triton LuxTop will designate Mr. Sillitoe to sit on the board of directors of Connect Bidco. Information regarding Mr. Sillitoe is set forth below in accordance with Commission rules.

Name:	<b>Andrew Sillitoe</b>
Citizenship:	British
Entity Type:	Individual
Principal Business:	Co-CEO of Apax Partners LLP
Percent Held:	<1 percent equity/25 percent voting
Ownership interest:	Triton LuxTop Holding SARL anticipates that it will designate Mr. Sillitoe to serve as a director of Connect Bidco. Mr. Sillitoe holds a limited partnership interest in A9 EUR Founder L.P. and A9 USD Founder L.P.

Kindly direct any questions regarding this supplement to the undersigned.

Respectfully submitted,

/s/ Wayne Johnsen  
Jennifer Hindin  
Wayne Johnsen  
Wiley Rein LLP  
1776 K Street, N.W.  
Washington, D.C. 20006  
Counsel for Connect Bidco  
Limited

Attachments

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<sup>2</sup> See Supplement at 3-4 and Revised Petition.

## Certification

I, Gonzague de Lhoneux, in my capacity as a Director of Connect Bidco Limited, declare as follows:

1. Connect Bidco Limited has calculated the ownership interests disclosed in the foregoing Second Supplement to Petition for Declaratory Ruling Under Section 310(b)(4) of the Communications Act of 1934, as amended, of Inmarsat plc, Inmarsat Solutions (US) Inc., ISAT US Inc. and Connect Bidco Limited based upon its review of the Commission's rules, and the interests disclosed satisfy each of the pertinent standards and criteria set forth in the rules.
2. To the best of my knowledge, all information contained in the Second Supplement to Petition for Declaratory Ruling to which this Certification is attached is true and correct.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed on September 18, 2019.

By:

