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BY HAND DELIVERY

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

Re: Stratos Communications, Inc.
Amendment to Application for Section 214 Authority, File No. ITC-214-20050826-00351

Dear Ms. Dortch:

By this letter, Stratos Communications, Inc. ("Stratos") hereby amends its application for Section 214 authority, File No. ITC-214-20050826-00351, filed August 26, 2005. In that application, Stratos requested authority to offer the Inmarsat Broadband Global Area Network ("BGAN") service using the Inmarsat fourth-generation satellite located at 52.75° W.L. ("the Inmarsat 4F2"). Stratos seeks to amend that application in order to: (1) seek authority to offer the BGAN service using all fourth-generation Inmarsat satellites; and (2) seek authority to offer existing Inmarsat services, including Inmarsat mini-M, M, M4, B, and C services, also using the fourth-generation Inmarsat satellites.

BGAN

This amendment seeks to broaden the requested authority in the underlying Section 214 application to include all fourth-generation Inmarsat satellites, and not only the Inmarsat 4F2, so that Stratos will be authorized under Section 214 of the Communications Act to offer the BGAN service using any of the fourth-generation satellites. Inmarsat has already launched a fourth-generation Atlantic Ocean Region ("AOR") satellite at 52.75° W.L. Another satellite is under construction, and may be launched and located at approximately 178° E.L. to provide Pacific Ocean Region ("POR") coverage. By covering all of the fourth-generation Inmarsat satellites in this application for Section 214 authority, it will be more efficient for the Commission and for Stratos.

As set forth in the application for Section 214 authority, the BGAN services will allow consumers to obtain enhanced Mobile Satellite Services ("MSS") at much higher data transmission

speeds than current MSS product offerings. This will allow the use of high data rate applications that are either not supported or offer limited functionality with existing MSS offerings. The BGAN service will offer MSS customers the ability to access broadband service from everywhere in the U.S. and most of the world at data transmission speeds unmatched by today's MSS offerings. This will allow MSS consumers to use high data rate applications like video conferencing, video on demand, and networking applications that are not fully supported by existing MSS offerings. For these reasons, the grant of this application is in the public interest.

Existing Inmarsat Services

This amendment also seeks authority for Stratos to offer existing Inmarsat services (including Inmarsat B, C, M, Mini-M, and M4) over the fourth-generation Inmarsat satellites. Since 2001, Stratos has been licensed to provide the Inmarsat services in the U.S. *See In the Matter of COMSAT Corporation d/b/a COMSAT Mobile Communications et al.*, 16 FCC Rcd 21661, (Oct. 9, 2001) ("*Inmarsat Market Access Order*"). The existing Inmarsat services are currently provided by Stratos using third-generation Inmarsat satellites. Inmarsat will be migrating these existing Inmarsat services from the third-generation satellites to the fourth-generation satellites. Stratos requests authority to continue to offer these existing Inmarsat services after they are migrated from the third-generation Inmarsat satellites to the fourth-generation Inmarsat satellites.

The following is a brief description of these existing Inmarsat services.

- **Mini-M**: Inmarsat Mini-M service offers low speed (2.4 kbps) voice, fax, and data capabilities. The Mini-m terminals are the smallest, lightest, and most power efficient of all of the Inmarsat voice terminals. Transportable terminals are the size of a notebook computer and weigh approximately 11 pounds. Marine terminals have radomes measuring 6 inches tall and weigh approximately 11 pounds.

- **M**: Inmarsat M service offers voice (6.2 kbps) and data and fax (2.4 kbps). It can also be used for internet access and email. Transportable terminals are the size of a briefcase and weigh approximately 22 pounds. Marine terminals have radomes that are approximately 2.5 high and weigh approximately 66 pounds.

- **M4**: Inmarsat M4 service offers low speed (2.4 kbps) voice, fax, and data capabilities combined with high-speed (64 kbps) data service. It uses small, lightweight, and power efficient user terminals that are the size of a laptop computer and weigh approximately 15 pounds.

- **B**: Inmarsat B service offers voice (16.0 kbps), Fax (14.4 kbps), and data (9.6 kbps). In addition, it offers high speed data service at speeds up to 64 kbps. Transportable terminals are the size of a small suitcase and weigh between 33 and 44 pounds. Marine terminals have radomes

that range from 3.3 to 4.0 feet high and weigh between 132 to 154 pounds.

- **C**: Inmarsat C service offers store-and-forward data messaging service. Stratos' Inmarsat C service allows clients anywhere in the world to send, fax, e-email, and telex messages as well as specialized ship-to-shore and shore-to-ship services.

These Inmarsat services are used by a wide range of Stratos customers, including the U.S. military, federal government, state and local government, and private sector end-users in the U.S. For instance, the U.S. military uses these services provided by Stratos to facilitate communications between the Navy's ships and military command centers on land, special forces operating in remote areas, and for personal communications for military troops. Some of Stratos' U.S. military customers using the Inmarsat services include: the United States Army, Navy and Air Force.

The Federal Government uses the existing Inmarsat services provided by Stratos for emergency relief efforts, law enforcement and homeland security. Some of Stratos' federal government customers of the Inmarsat services include: State Department, Federal Emergency Management Agency ("FEMA"), the U.S. Coast Guard and the Federal Bureau of Investigation. Like the Federal Government, state and local governments routinely use the Inmarsat services provided by Stratos for law enforcement and in order to protect lives and safeguard property. Some of Stratos' state and local government customers of the Inmarsat services include: the New York Fire Department, Los Angeles Fire Department and National Guard Units restoring devastated areas impacted by the recent storms.

The private sector, including numerous companies in the oil and gas industry, use the Inmarsat services provided by Stratos in order to provide critical communications services supporting their business operations in remote areas. Stratos' U.S. private sector customers include: Chevron/Texaco, Global Santa Fe and Edison International (parent company of Southern California Edison). There is significant use of the Inmarsat services being used by these firms today to restore operations devastated in the Gulf of Mexico.

Grant of this application as amended will allow Stratos to continue providing existing Inmarsat services to its customers using fourth-generation Inmarsat satellites. As set forth above, these Inmarsat services are used to facilitate military communications, law enforcement and homeland security, emergency relief efforts, protect lives and safeguard property and to provide critical communications services to support business operations in remote areas. Any disruption of services to the Stratos customers would not be in the public interest.

Stratos respectfully requests that the Commission accept this amendment and grant the

underlying Section 214 application to allow Stratos to offer BGAN and existing Inmarsat services over fourth-generation Inmarsat satellites. If you have any questions on this matter, please feel free to contact me.

Sincerely,

Marc A. Paul/BOK

Marc A. Paul

cc: See attached Certificate of Service

CERTIFICATE OF SERVICE

I, Brendan Kasper, an attorney with the law firm of Steptoe & Johnson LLP, hereby certify that on this 2nd day of January, 2006, served a true copy of the foregoing Motion to Strike by first class mail, postage pre-paid (or as otherwise indicated) upon the following:

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