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August 14, 2013

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
International Bureau Applications
P.O. Box 979093
St. Louis, MO 63197-9700

Re: *In the Matter of the Joint Application of RigNet Satcom, Inc. (“Assignee”) and Stratos Offshore Services Operating Company (“Assignor”) for Grant of Authority Pursuant to Section 214 of the Communications Act of 1934, as amended, and Sections 63.04 and 63.24 of the Commission’s Rules to Complete the Assignment of Assets, Customers and Section 214 Licensee*

Dear Ms. Dortch:

On behalf of RigNet Satcom, Inc. (“RigNet”) and Stratos Offshore Services Operating Company (“Stratos”), enclosed is an application for authority to complete the assignment of assets, customers and Section 214 authority from Stratos to RigNet.

Pursuant to Section 63.04(b) of the Commission’s rules, Applicants submit this filing as a combined domestic section 214 application and international section 214 application (“Combined Application”). Applicants are simultaneously submitting for filing the Combined Application with the Wireline Competition Bureau, in accordance with the Commission’s rules.

This filing and the applicable credit card payments in the amount of \$1,050.00 which satisfy the filing fees required for the applications under line 2.b of Section 1.1105 of the Commission’s rules, are being submitted electronically through the MyIBFS.

Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,



Catherine Wang
Denise Wood

Counsel for RigNet Satcom, Inc.

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of the Joint Application of)	
)	
Stratos Offshore Services Company,)	File No. ITC-ASG-2013 _____
Assignor,)	
)	
and)	WC Docket No. 13- _____
)	
RigNet SatCom, Inc.,)	
Assignee)	
)	
For Grant of Authority Pursuant to)	
Section 214 of the Communications Act of 1934,)	
as amended, and Sections 63.04 and 63.24 of the)	
Commission's Rules to Complete an)	
Assignment of Licenses and Purchase of Assets)	
of an Authorized Domestic and International)	
Section 214 Carrier)	
)	

JOINT APPLICATION

I. INTRODUCTION

A. Summary of Request

Stratos Offshore Services Company (“Stratos” or “Assignor”) and RigNet SatCom, Inc. (“RigNet” or “Assignee”) (collectively, the “Applicants”), pursuant to Section 214 of the Communications Act, as amended, 47 U.S.C. § 214, and Sections 63.04 and 63.24 of the Commission’s Rules, 47 C.F.R. §§ 63.04, 63.24, respectfully request Commission approval for Section 214 authority in a transaction whereby RigNet will acquire from Stratos certain assets, including certain licenses, related network facilities, and customer accounts in the oil and gas industry associated with Stratos’ retail energy business. As described below, RigNet is well-qualified to hold Section 214 authorizations and own and operate the licensed operations.

Further, the proposed transaction will be virtually transparent to assigned customers with respect to the services that they receive.

B. Request for Streamlined Processing

Applicants respectfully submit that this Application is eligible for streamlined processing pursuant to Sections 63.03 and 63.12 of the Commission's Rules, 47 C.F.R. §§ 63.03 & 63.12. With respect to domestic authority, this Application is eligible for streamlined processing pursuant to Section 63.03(b)(2)(i) because, immediately following the transactions, (1) Applicants and their affiliates, as defined in Section 3(1) of the Communications Act ("Affiliates"), combined will hold less than a ten percent (10%) share of the interstate, interexchange market; (2) to the extent that Applicants and their Affiliates provide local exchange service, such services will be provided only in areas also served by a dominant local exchange carrier not party to the proposed transactions; and (3) none of the Applicants or their Affiliates is dominant with respect to any service.

This Application is eligible for streamlined processing pursuant to Section 63.12 of the Commission's Rules, 47 C.F.R. § 63.12, because, as further described in Section IV below, none of the exclusionary criteria set forth in Section 63.12(c) applies. While RigNet is currently affiliated with sister companies holding licenses in certain specialized services in Brazil, Qatar, Malaysia, and Oman, and Stratos is affiliated with certain providers of specialized services in Canada, Great Britain, and Russia, among other countries,¹ this Application qualifies for streamlined processing. This is because, following completion of the proposed transaction: (1) RigNet, will qualify for a presumption of non-dominance under 47 C.F.R. § 63.10(a)(3) because its post-transaction foreign

¹ See, e.g., *In the Matter of Robert M. Franklin, Transferor, 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, 481, ¶ 75 (2009).

carrier affiliates have less than a 50% share of the local access and international transport markets in the relevant markets, *see* 47 C.F.R. § 63.12(c)(1)(ii); and (2) RigNet will not be affiliated with any dominant U.S. carrier whose international switched or private lines services it seeks to resell, *see* 47 C.F.R. § 63.12(c)(2).

In support of this Application, Applicants provide the following information:

II. DESCRIPTION OF THE APPLICANTS

A. **Stratos Offshore Services Company (Assignor)**

Stratos Offshore Services Company is a Delaware corporation and wholly owned direct subsidiary of Stratos Holdings, Inc. (“Stratos Holdings”), a Delaware corporation headquartered at 1101 Connecticut Avenue, NW, Suite 1200, Washington, DC 20036. Stratos Holdings is held by Inmarsat US Investments Limited, a Delaware company (100% of the preferred shares), its parent Inmarsat US Services LLC, a Delaware company (20% of the common shares), and its parent Inmarsat Group Holdings Inc., a Delaware corporation (80% of the common shares). Inmarsat Group Holdings Inc. is a wholly owned subsidiary of Inmarsat Solutions Ltd, a U.K. company, which is a wholly owned subsidiary of Inmarsat Finance III Limited, a U.K. company, (“Finance III”). In turn, Finance III is a wholly owned subsidiary of Inmarsat Ventures Ltd, a U.K. company, a wholly owned subsidiary of Inmarsat Investments Ltd, a U.K. company, which is a wholly owned subsidiary of Inmarsat Group Ltd, a U.K. company, which is a wholly owned subsidiary of Inmarsat Holdings Ltd, a U.K. company, which is a wholly owned subsidiary of Inmarsat plc (“Inmarsat”), a U.K. company. A chart depicting the ownership chain of Assignor is attached hereto as **Exhibit A**.

Inmarsat, through its subsidiaries, is a provider of global mobile satellite communications. Inmarsat and its subsidiaries provide mobile satellite service, fixed satellite

service and terrestrial communications solutions to customers worldwide. In the energy broadband market, Stratos provides very small aperture terminal (“VSAT”) services utilizing VSAT terminals and hubs located in the United States, Russia and the United Kingdom, among other countries. In addition, Stratos operates a terrestrial microwave network in the U.S. Gulf of Mexico, over which it serves primarily the offshore rigs and platforms of oil and gas companies. Stratos also provides competitive local exchange, competitive access and interexchange telecommunications services in Louisiana and Texas, primarily to its oil and gas industry customers. Stratos provides VSAT SCADA services in all states except Hawaii.

B. RigNet SatCom, Inc. (“Assignee”)

RigNet SatCom, Inc. is Delaware corporation, headquartered at 1880 S. Dairy Ashford, Suite 300 Houston, TX 77077. RigNet is a global provider of managed remote communications, systems integration and collaborative applications dedicated to the oil and gas industry, focusing on offshore and onshore drilling rigs, offshore production facilities and energy maritime. RigNet provides specialized solutions ranging from fully managed voice and data networks to more advanced applications that include video conferencing and real-time data services. RigNet’s secure communications and private extranet allow its customers to manage information flows and execute mission-critical operations primarily in remote areas, including offshore and land-based drilling rigs, offshore and onshore production facilities, energy maritime vessels and regional support offices, where conventional telecommunications infrastructure is either unavailable or unreliable. A chart depicting the ownership chain of Assignee is attached hereto as **Exhibit B**.

RigNet is authorized by the Commission to provide, on a private carrier basis, digital data services to oil and gas-related facilities located in isolated areas underserved by terrestrial

infrastructure pursuant to Ku-band and VSAT licenses granted in file numbers SES-LIC-20060815-01373 and SES-LIC-20070608-00779.

III. DESCRIPTION OF THE TRANSACTION

Pursuant to an Asset Purchase Agreement (“Agreement”), dated August 1, 2013, Applicants propose to complete a transaction whereby RigNet will acquire the portion of Stratos’ operations focused on providing retail broadband communications services to the energy sector. The asset sale entails a purchase of the Inmarsat/Stratos business operating pursuant to certain Section 214 authorizations, wireless and earth station licenses, related network facilities and certain customer accounts.² (In a related service agreement, RigNet will become a key distribution partner to Inmarsat offering Global Xpress, a new generation, high throughput satellite communications service, and L-Band services worldwide.) RigNet will offer common carrier international services pursuant to international Section 214 authorizations for facilities-based and global resale services granted under ITC-214-19980914-00636 and ITC-214-19991220-00815 that it is acquiring from Stratos.³ RigNet will also provide domestic interstate services to acquired customers pursuant to blanket Section 214 authority. Customers will continue to receive service from RigNet under the comparable rates, terms and conditions of services immediately following the proposed transaction as they do today. Any future changes in the rates, terms and conditions of service for customers will be undertaken pursuant to applicable federal and state notice and tariff requirements.

² Applicants will file applications for assignment of earth station licenses and wireless radio services licenses and leases.

³ To the extent that Stratos will continue to offer international services to other customers, it will operate under the multiple Section 214 authorizations held in the name of its 100 percent parent Stratos Holdings, Inc.

IV. PUBLIC INTEREST STATEMENT

The proposed transaction will enhance the strategic positioning of both companies as they continue to serve the communications needs of the global energy sector. The transaction will add to RigNet's technology solutions, customer base and geographic footprint thereby giving RigNet broader and deeper capabilities to serve the oil and gas industry through all phases from drilling through production. Customers will benefit from RigNet's expanded services portfolio, new capabilities from additional VSAT facilities and acquired microwave and WiMAX networks in the U.S. Gulf of Mexico, and an expansion of highly skilled staff currently supporting the business. RigNet's extensive product and services portfolio tailored for the oil and gas industry, coupled with the unprecedented connectivity capabilities of Inmarsat's Global Xpress network, will make possible an unprecedented advance in managed remote communications services that are available to enterprise customers in the oil and gas industry.

The proposed transaction will serve the public interest by enabling the Applicants to provide an expanded array of advanced services to meet the growing communications services demand of an important worldwide industry sector. In addition, the transaction will not disrupt service and customers will enjoy continuity of high-quality international and interstate telecommunications service. The rates, terms and conditions of service will not change as a result of the assignment, and the proposed transaction will be virtually transparent to customers in terms of the services they receive.

In accordance with the Commission's Rules, customers will be notified of the transaction and the change in their telecommunications provider. Prior to consummation of the transaction, RigNet will separately file a certification that it is complying with the Commission's procedures

set forth in Section 64.1120(e) of the Commission's Rules regarding the acquisition of customers. A sample customer notification letter is attached as **Exhibit C**.

V. INFORMATION REQUIRED BY SECTION 63.24(e)

Pursuant to Section 63.24(e)(3) of the Commission's Rules, the Applicants submit the following information requested in Section 63.18 (a)-(d) and (h)-(p) in support of this Application:

63.18 (a) Name, address and telephone number of each Applicant:

Assignor:

Stratos Offshore Services Company
1101 Connecticut Avenue, NW
Suite 1200
Washington, DC 20036
(202) 248-5150 (Tel)

FRN: 0002147353

Assignee:

RigNet SatCom, Inc.
1880 S. Dairy Ashford, Suite 300
Houston, TX 77077
(281) 674-0100 (Tel)

FRN: 0015217680

63.18 (b) Jurisdiction of Organizations:

Assignor: Stratos is a corporation formed under the laws of the State of Delaware.

Assignee: RigNet is a corporation formed under the laws of the State of Delaware.

63.18 (c) Correspondence concerning this Application should be sent to:

For RigNet:

Catherine Wang
Denise Wood
Bingham McCutchen LLP
2020 K St. NW, 11th Fl.
Washington, DC 20006
202-373-6000 (Tel)
202-373-6001 (Fax)
catherine.wang@bingham.com

With a copy to:

Bob Ward
RigNet, Inc.
1880 S. Dairy Ashford, Suite 300
Houston, Texas 77077
281-674-0775 (Tel)
281-674-0101 (Fax)
bob.ward@rig.net

For Stratos:

Christine M. Crowe
Timothy J. Cooney
Wilkinson Barker Knauer, LLP
2300 N Street, NW; Suite 700
Washington, DC 20037
202-781-4141 (Tel)
202-783-5851 (Fax)
ccrowe@wbkclaw.com

With a copy to:

Bruce Henoch
Inmarsat
1101 Connecticut Avenue, NW
Suite 1200
Washington, DC 20036
202-696-1381 (Tel)
202-248-5177 (Fax)
bruce.henoch@inmarsat.com

63.18 (d) Section 214 Authorizations

Assignor: Stratos holds blanket domestic Section 214 authority and holds international Section 214 authority granted in File Nos. ITC-214-19980914-00636 and ITC-214-19991220-00815.

Assignee: RigNet does not currently hold domestic or international Section 214 authority.

63.18 (h) Ownership

The following entities hold, directly or indirectly a 10% or greater interest in RigNet as calculated pursuant to Commission ownership attribution rules for wireline and international telecommunications carriers:⁴

Pre- and Post-Transaction Ownership of RigNet:

- 1) The following entity owns or controls 10% or more of **RigNet SatCom, Inc.**

⁴ Because the Commission's rules for combined domestic and international applications require this information only for the assignee/transferee, *see* 47 C.F.R. §§ 63.04(b), 63.24(3)(2), Applicants are providing ownership information only for RigNet.

Name: **RigNet, Inc.**
Address: 1880 S. Dairy Ashford, Suite 300, Houston, TX 77077
Citizenship: U.S.
Principal Business: Oilfield Communications
% Equity: 100%

- 2) The following entity owns or controls 10% or more of **RigNet, Inc.**

Name: **Energy Growth AS**
Address: Tordenskioldgate 6B
0160 Oslo
Citizenship: Norway
Principal Business: Investment
% Equity: 25.3%

- 3) The following entities own or control 34.12% or more of **Energy Growth AS** (and indirectly own or control 10% or more of RigNet).

Name: **Energy Growth Holding AS**
Address: Tordenskioldgate 6B
0160 Oslo
Citizenship: Norway
Principal Business: Holding Company
% Equity: 2 25.3% indirectly in RigNet (owns 100% of Energy Growth AS)

Name: **CSV III AS**
Address: Tordenskioldgate 6B
0160 Oslo
Citizenship: Norway
Principal Business: Investment
% Equity: 25.3% indirectly in RigNet (owns 100% of Energy Growth Holding AS)

Name: **Cubera Secondary KS**
Address: Tordenskioldgate 6B
0160 Oslo
Citizenship: Norway
Principal Business: Investment
% Equity: 25.3% indirectly in RigNet (owns 60.5% of CSV III AS)

Name: **Cubera Secondary (GP) AS**
Address: Tordenskioldgate 6B
0160 Oslo
Citizenship: Norway
Principal Business: Investment
% Equity: 25.3% indirectly in RigNet (General Partner of Cubera Secondary KS)

Name: **Namløs AS**
Address: Tordenskioldgate 6B
0160 Oslo
Citizenship: Norway
Principal Business: Investment
% Equity: 11.6% indirectly in RigNet (owns 45.9% of Cubera Secondary (GP) AS)

Namløs AS is 100% owned by Cubera Managing Partner, Jørgen Kjærnes, who is a citizen of Norway. Mr. Kjaernes' indirect interest in RigNet, Inc. is 11.6%. Mr. Kjærnes may be contacted at Tordenskioldsgate 6B, 0160 Oslo, Norway.

- 4) No other individual or entity owns or controls more than 10% directly or indirectly of **RigNet**.
- 5) **Interlocking Directorates:** Mark Slaughter, Chief Executive Officer and President of RigNet, Inc., and Marty Jimmerson, Chief Financial Officer of RigNet, Inc., serve as directors of RigNet SatCom, Inc., RigNet Middle East LLC, RigNet Qatar W.L.L., RigNet Sdn. Bhd., RigNet Serviços de Telecomunicações Brasil Ltda., RigNet UK Ltd, Moscow Teleport LLC, and RigNet (CA), Inc.

63.18 (i) RigNet is currently affiliated with foreign carriers in Brazil, Qatar, Malaysia, and Oman.⁵ RigNet certifies that following consummation of the transaction: (i) it will not be a foreign carrier within the meaning of Section 63.09(d) of the Commission's Rules, 47 C.F.R. § 63.09(d); and (ii) it will continue to be affiliated with RigNet Serviços de Telecomunicações Brasil Ltda., which provides mobile satellite services in Brazil; RigNet Qatar W.L.L., which provides mobile satellite services in Qatar; RigNet Sdn. Bhd., which provides mobile satellite services in Malaysia; and RigNet Middle East LLC, which provides mobile satellite services in Oman; and (iii) it will become affiliated, within the meaning of the Commission's Rules, with RigNet (CA), Inc. , which will provide mobile satellite services in Canada; RigNet UK Ltd, which will provide mobile satellite services and very small aperture terminal ("VSAT") services in Great Britain; and Moscow Teleport LLC, which will provide

⁵ RigNet's affiliate, RigNet BRN Sdn Bhd, has a pending application to provide mobile satellite services in Brunei. RigNet will update the Commission within thirty days of approval of that application.

VSAT services in Russia. These specialized services are provided to oil and gas industry customers in these locations.

63.18 (j) RigNet certifies that it does not seek to provide international telecommunications services to any destination country where:

- (1) RigNet is a foreign carrier in that country; or
- (2) RigNet controls a foreign carrier in that country; or
- (3) Any entity that owns more than 25 percent of RigNet, or that controls RigNet, controls a foreign carrier in that country, except in Brazil, Qatar, Malaysia, Oman, Canada, Great Britain, and Russia, where RigNet, Inc. will control RigNet's affiliates RigNet Serviços de Telecomunicações Brasil Ltda., RigNet Qatar W.L.L., RigNet Sdn. Bhd., RigNet Middle East LLC, RigNet UK Ltd, RigNet (CA), Inc. , and Moscow Teleport LLC that provide the services describe above in response to Section 63.18(i); or
- (4) Two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate more than 25 percent of RigNet and are parties to, or the beneficiaries of, a contractual relation affecting the provision or marketing or international basic telecommunications services in the United States.

63.18 (k) Brazil, Qatar, Malaysia, Oman, Canada, Great Britain and Russia are members of the WTO and none of RigNet's foreign carrier affiliates has a 50 percent or greater share of the markets for international transport and local access in their respective destination countries.

63.18 (l) Not applicable.

63.18 (m) RigNet's affiliate, RigNet Serviços de Telecomunicações Brasil Ltda., lacks sufficient market power in Brazil to adversely affect competition in the U.S. market, as it controls far less than 50% of the local access and international transport markets in Brazil. RigNet's affiliate, RigNet Qatar W.L.L., lacks sufficient market power in Qatar to adversely affect competition in the U.S. market, as it controls far less than 50% of the local access and international transport markets in Qatar. RigNet's affiliate, RigNet Sdn. Bhd., lacks sufficient market power in Malaysia to adversely affect competition in the U.S. market, as it controls far less than 50% of the local access and international transport markets in Malaysia. RigNet's affiliate, RigNet Middle East LLC, lacks sufficient market power in Oman to adversely affect competition in the U.S. market, as it controls far less than 50% of the local access and international transport markets in Oman. RigNet's affiliate, RigNet (CA), Inc. , lacks sufficient market power in Canada to adversely affect competition in the U.S. market, as it controls far less than 50% of the local access and international transport markets in Canada. RigNet's affiliate, RigNet UK Ltd, lacks sufficient market power

in Great Britain to adversely affect competition in the U.S. market, as it controls far less than 50% of the local access and international transport markets in Great Britain. RigNet's affiliate, Moscow Teleport LLC, lacks sufficient market power in Russia to adversely affect competition in the U.S. market, as it controls far less than 50% of the local access and international transport markets in this market. Accordingly, RigNet is entitled, under Section 63.10(a)(3), 47 C.F.R. § 63.10(a)(3), to non-dominant status on all routes.

- 63.18 (n)** Applicants certify that they have not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route and will not enter into such agreements in the future.
- 63.18 (o)** Applicants certify that they are not subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1998. *See* 21 U.S.C. § 853a. *See also* 47 C.F.R. §§ 1.2001-1.2003.
- 63.18 (p)** Applicants respectfully submit that this Application is eligible for streamlined processing pursuant to Section 63.12(a)-(b) of the Commission's Rules, 47 C.F.R. §63.12(a)-(b) because, after the transaction is completed, (1) RigNet, will qualify for a presumption of non-dominance under 47 C.F.R. § 63.10(a)(3) because its post-transaction foreign carrier affiliates have less than a 50% share of the local access and international transport markets in the relevant markets, *see* 47 C.F.R. § 63.12(c)(1)(ii); and (2) RigNet will not be affiliated with any dominant U.S. carrier whose international switched or private lines services it seeks to resell, *see* 47 C.F.R. § 63.12(c)(2).

VI. INFORMATION REQUIRED BY SECTION 63.04

In lieu of an attachment, pursuant to Commission Rule 63.04(b), 47 C.F.R. § 63.04(b), Applicants submit the following information in support of their request for domestic Section 214 authority in order to address the requirements set forth in Commission Rule 63.04(a)(6)-(12), 47 C.F.R. § 63.04(a)(6)-(12):

- (a)(6)** A description of the proposed Transaction is set forth in **Section III** above.
- (a)(7)** Stratos provides competitive telecommunications services in Texas and Louisiana and VSAT SCADA services in all states except Hawaii.

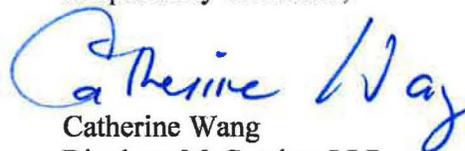
RigNet does not provide domestic common carrier interstate or intrastate telecommunications services.

- (a)(8) Applicants respectfully submit that this Application is eligible for streamlined processing pursuant to Sections 63.03 of the Commission’s Rules, 47 C.F.R. §63.03. In particular, with respect to domestic authority, this Application is eligible for streamlined processing pursuant to Section 63.03(b)(2)(i) because, immediately following the transaction, (1) Applicants and their affiliates (as defined in Section 3(1) of the Communications Act – (“Affiliates”) combined will hold less than a ten percent (10%) share of the interstate, interexchange market; (2) to the extent that Applicants and their Affiliates provide local exchange service, such services will be provided only in areas served by dominant local exchange carriers (none of which is a party to the proposed transaction) and; (3) none of the Applicants or their Affiliates is dominant with respect to any service.
- (a)(9) By this Application, Applicants seek authority with respect to both international and domestic Section 214 authorizations. (This Application is being separately and concurrently filed with respect to both types of authorities in compliance with Commission Rule 63.04(b), 47 C.F.R. § 63.04(b)). Applicants will also file applications seeking Commission authority to assign certain earth station and wireless licenses and leases and a petition for declaratory ruling pursuant to Section 310(b)(4) of the Act to permit a greater than 25% indirect foreign ownership interest in RigNet. No other applications are being filed with the Commission with respect to this transaction.
- (a)(10) Prompt completion of the proposed transaction is critical to ensure that Applicants can obtain the benefits described in the foregoing application. Accordingly, Applicants respectfully request that the Commission approve this Application expeditiously in order to allow Applicants to consummate the proposed transaction as soon as possible.
- (a)(11) Not applicable.
- (a)(12) A statement showing how grant of the application will serve the public interest, convenience and necessity is provided in **Section IV** above.

VII. CONCLUSION

For the reasons stated above, Applicants respectfully submit that the public interest, convenience, and necessity would be furthered by a grant of this Application. Applicants therefore respectfully request that the Commission consider and approve this Application expeditiously to permit Applicants to consummate the proposed transaction as soon as possible.

Respectfully submitted,



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Counsel for RigNet SatCom, Inc.

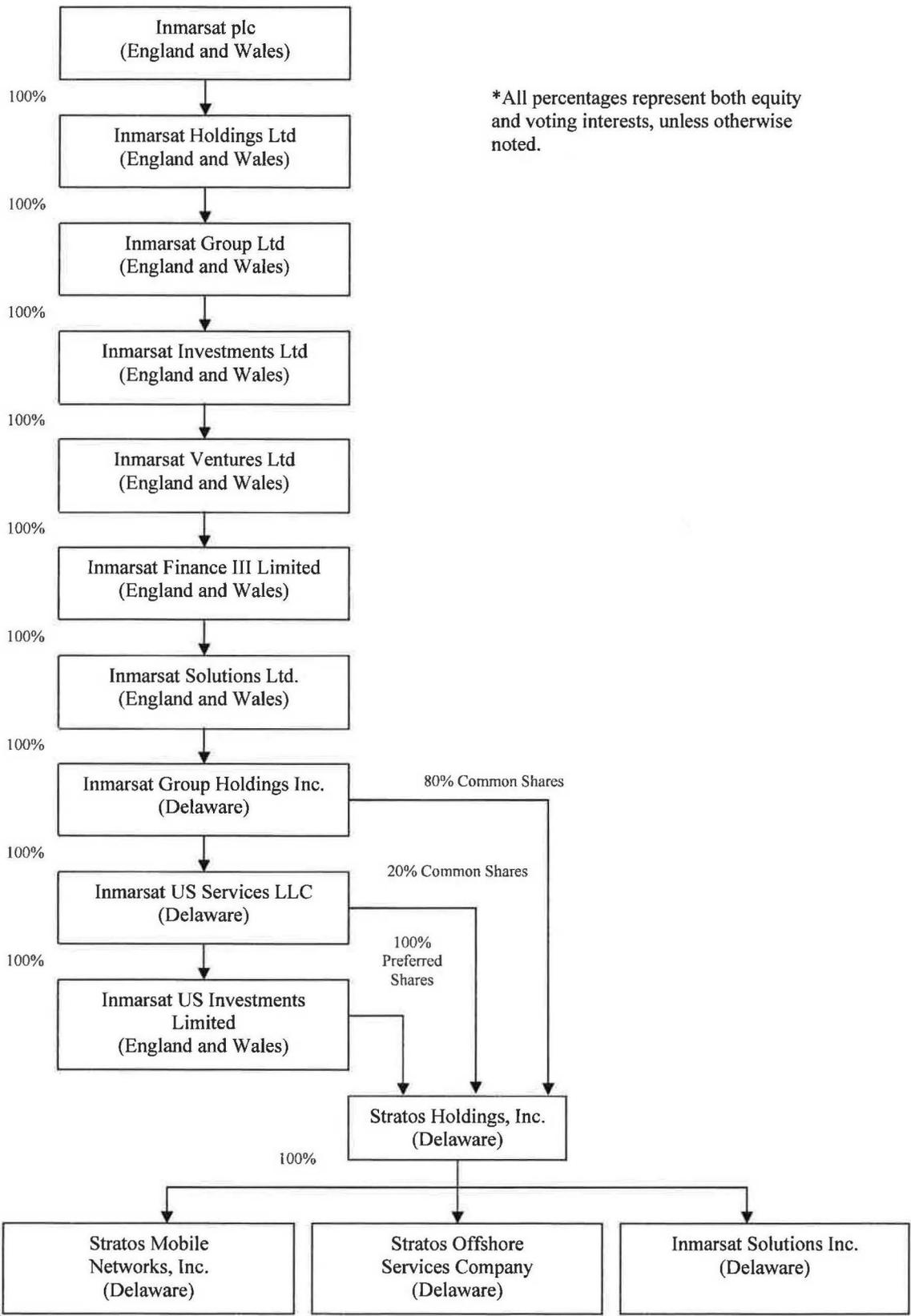
Christine Crowe
Wilkinson Barker Knauer, LLP
2300 N Street, NW; Suite 700
Washington, DC 20037
202-781-4141 (Tel)
202-783-5851 (Fax)
ccrowe@wbklaw.com

Counsel for Stratos Offshore Services
Company

Dated: August 15, 2013

EXHIBIT A
ASSIGNOR OWNERSHIP

EXHIBIT A



*All percentages represent both equity and voting interests, unless otherwise noted.

EXHIBIT B
ASSIGNEE OWNERSHIP

RigNet Ownership and Control Structure

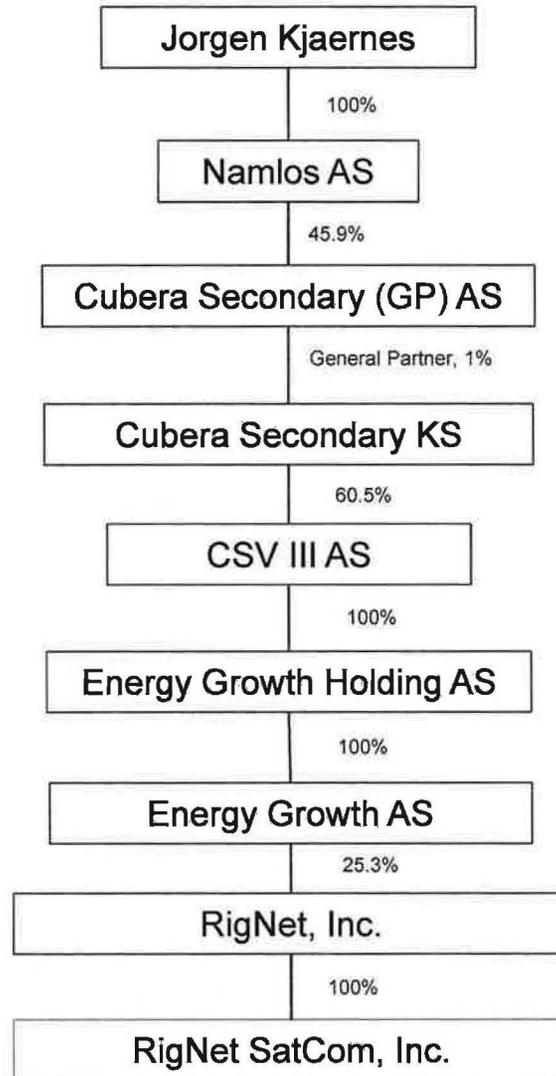


EXHIBIT C
SAMPLE CUSTOMER NOTIFICATION

COMPANY LETTERHEAD

[DATE]

«MailToName»
«MailStreet1» «MailStreet2»
«MailCity», «MailState» «MailZip»-«MailZipPlus4»

Regarding Account #«AccountNumber» / «AccountName»

Dear Valued Customer:

On August 1, 2013, RigNet SatCom, Inc. ("RigNet") announced an agreement with Stratos Offshore Services Company ("Stratos") to acquire certain assets of Stratos' business, subject to regulatory approval, including your account. Once that happens, your service will be provided by RigNet but under your current contract with Stratos.

Please rest assured that the transaction will not affect the services you currently receive. You will continue to receive services with the same rates, features, terms and conditions as you currently enjoy. Any changes to your service following the transaction will be made in compliance with your contract, service terms and applicable federal and state regulatory requirements. RigNet will automatically become your telecommunications provider on or after [DATE], 2013.

This change will be completely seamless for you and you do not need to do anything in order for it to occur. RigNet will take care of all of the details and will be responsible for any change fees associated with transferring your account. However, it is important that you be aware of the following information. You are responsible for continued payment of your monthly recurring and usage charges throughout this period. Unless you have made arrangements on your own to switch your provider prior to the date that your services are transferred to RigNet, your account will automatically be transferred and your service contract assigned to RigNet. All preferred carrier freezes will be lifted for purposes of completing the transfer of your services to RigNet. RigNet will reinstate any preferred carrier freeze you may have with Stratos if you currently receive local telephone service from Stratos. In the event that you currently receive local service from a provider other than Stratos, you will need to contact your existing or new local service provider to reinstate your preferred carrier freeze. In addition, any deposit or prepayment you have paid, if any, will be transferred with your account to RigNet. Although subject to the terms of your current contract, you have the option to select another provider. We value your business and we hope that RigNet may continue to serve you. If you should choose another provider you will need to contact that carrier directly to arrange for the change prior to the transfer of your services to RigNet. We note that it can take several weeks for a new carrier to make the switch and you may also incur service initiation fees from that provider such as service order, installation and other similar charges associated with establishing a new service account.

Our mission is to provide superior products and services to our customers. We want to thank you for your continued support. If you have any questions regarding your current services, please call the Stratos customer service department at 800-375-1562. If you would like more information about the transaction, please call the RigNet customer service department toll-free at 888-974-4638.

RigNet looks forward to serving you.

Sincerely,

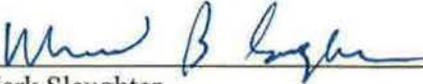
[Name]
[Title]
RigNet SatCom, Inc.

[Name]
[Title]
Stratos Offshore Services Company

VERIFICATION

I, Mark Slaughter, state that I am the Chief Executive Officer & President of RigNet SatCom, Inc. ("RigNet"); that I am authorized to make this Verification on behalf of RigNet; that the foregoing filing was prepared under my direction and supervision; and that the contents with respect to RigNet are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 14 day of August, 2013.



Mark Slaughter
Chief Executive Officer & President RigNet
SatCom, Inc.

VERIFICATION

I, Bruce A. Henoeh, state that I am the Vice President & General Counsel of Stratos Offshore Services Company ("Stratos"); that I am authorized to make this Verification on behalf of Stratos; that the foregoing filing was prepared under my direction and supervision; and that the contents with respect to Stratos are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 14th day of August, 2013.



Bruce A. Henoeh
Vice President & General Counsel
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