

ATTACHMENT 1

Response to Question 10

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

In the Matter of)
)
KVH Services LLC) File No. ITC-214-20101101-00434
)
Application for Special Temporary)
Authority to Offer International Services)
Pursuant to Section 214 of the)
Communications Act of 1934, as Amended)

REQUEST FOR EXTENSION OF SPECIAL TEMPORARY AUTHORITY

KVH Services LLC (“KVH Services” or “Applicant”) hereby requests the grant of a new Special Temporary Authority (“STA”) or extension of the existing STA (herein called the “STA Extension”) in order to continue providing, on a temporary basis, international telecommunications services pursuant to 47 U.S.C. § 214, as amended. The STA Extension is necessary pending the ongoing review of the Applicant’s request for permanent Section 214 authorization (herein called the “214 Authorization Application”) by the Executive Branch agencies, which is informally known as “Team Telecom” and includes the Department of Homeland Security (DHS), Department of Justice (DOJ) and the Department of Defense (DOD). Team Telecom has been informed of the Applicant’s request for STA Extension and has indicated that it has no objections to the request.

BACKGROUND

On November 1, 2010, KVH Services filed with the Federal Communications Commission (“Commission”) an application for Section 214 Authorization contemporaneously

with an application for STA in order to operate in an expedited manner pursuant to Section 214 of the Communications Act of 1934, as amended (“Act”). On November 12, 2010, the 214 Authorization Application was accepted for filing on a streamlined basis. However, due to the Applicant’s direct foreign ownership, the 214 Authorization Application was removed from streamlined processing in a November 26, 2010 Public Notice for further review by Team Telecom. As provided in the 214 Authorization Application and initial STA Application, KVH Services is a Delaware limited liability company whose ultimate majority owners are well-established U.S. companies and members of the Fidelity Group companies, although the direct parent company of KVH Services is a non-dominant Japanese foreign carrier.

On November 23, 2010, the Applicant’s initial STA was granted for a period of 180 days. As such, the STA is set to expire on May 21, 2011, by which time Team Telecom may not have completed its review of the 214 Authorization Application. Granting of the STA Extension prior to the May 21 deadline will ensure that KVH Services is able to provide services seamlessly and without interruption to its U.S. customers while Team Telecom completes its review process. KVH Services is seeking the STA extension, pending permanent authority, to continue to provide valuable data communications to U.S. businesses and to promote competition in the international telecommunications services market.

IMPACT STATEMENT

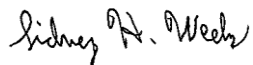
The grant of this STA Extension request will serve the public interest, convenience and necessity because such grant will permit KVH Services to continue providing regulated services to new and existing global customers who are basing their business decisions on KVH Services for their telecommunication needs.

KVH Services acknowledges that the grant of this STA Extension request will not prejudice any action the Commission may take on the underlying 214 Authorization Application for permanent authority to operate pursuant to the Section 214 of the Act. KVH further acknowledges that the grant of STA may be revoked by the Commission upon its own motion without hearing.

CONCLUSION

For the above reasons, KVH Services respectfully requests that the Commission grant it an extension of the STA or a new STA to provide international telecommunications services described in the STA Extension Application until such time as the Commission acts upon the formal application of KVH Services for permanent authority pursuant to the Act or, alternatively, a six-month period that may be extended by further STA application.

Respectfully Submitted,



Sidney H. Weeks
KVH Services LLC

Response to question 12

KVH Services LLC is affiliated with the following foreign carriers. These carriers are new market entrants and do not have market power in any of the countries in which they operate. Further, all of the below-listed countries are WTO member countries.

Through its direct parent company, KVH Co., Ltd., a Japanese company, the Applicant is affiliated with foreign carriers in Japan (KVH Co., Ltd., the 100% owner of KVH) and Singapore (KVH (Singapore) Pte. Ltd., which is 100% owned by KVH Co., Ltd.

Through one of its indirect parent companies, FMR LLC (a Delaware limited liability company), KVH Services LLC is affiliated with COLT Telecom Group S.A. (“COLT”), a Luxembourg holding company of operating foreign carrier entities in several European countries, including the United Kingdom, Germany, France, Switzerland, Italy, Spain, The Netherlands, Belgium, Austria, Sweden, Denmark, Norway, Portugal, Ireland and Finland. FMR LLC owns approximately 35% of the equity of COLT.

KVH Services LLC certifies it seeks to provide international telecommunications services to a destination country for which its parent company is a foreign carrier in that country, as described in Sections 63.18(j)(3) of the Commission’s Rules. The destination country is Japan, which a signatory of the WTO.

Response to question 16

Pursuant to 47 C.F.R. 63.18(d) of the Commission’s Rules, KVH Services certifies that it has not previously received authority under Section 214 of the Act.

KVH Services has requested global facilities-based and global resale authority pursuant to terms and conditions of Section 214 of the Act and Sections 63.18(e)(1) and 63.18(e)(2) of the Commission’s Rules. KVH Services certifies that it will comply with the terms and conditions contained in Sections 63.21 and 63.23 of the Commission’s Rules. Since KVH Services is not seeking authority to acquire facilities or provide services not covered by Section 63.81(e)(1) and (e)(2), Section 63.18(e)(3) does not apply to the instant request for STA Extension.

Pursuant to 47 C.F.R. 63.18(g), KVH Services is not seeking facilities-based authority under Section 63.18(e)(3) and its facilities are not listed in Section 1.1306 of the Commission’s rules. Therefore, an environmental assessment as described in Section 1.1311 of the Commission’s rules is not required upon filing.