

**KVH Services LLC
Supplement to STA Application**

December 19, 2018

Colt Group S.A. (“Colt”) herein provides the following additional and clarifying information with respect to its request for special temporary authority (“STA”) to maintain control of KVH Services LLC (“KVH”) while the Commission considers its underlying transfer of control application.

With respect to Colt’s response to Question 10, Colt herein clarifies that it is not seeking approval on a “*nunc pro tunc*” basis for the transfer of control of KVH to Colt.

As Colt indicated in its STA application, the STA is needed because Colt completed on December 22, 2014 an acquisition of KVH’s ultimate parent company, KVH Asia Limited, without first securing Commission approval for the transfer of control of the 214 authorization held by KVH. The grant of this requested STA would provide substantial public interest benefits because it would enable Colt to continue use KVH’s facilities and regulatory authorization to provide international telecommunications services to its enterprise customers, most of which operate globally and rely on the Colt telecommunications network for their internal communications, operational support and logistics. Any interruption in the provision of these services would be extremely detrimental to Colt’s customers.

Colt has been unable to determine exactly why the 2014 transaction was completed without first securing approval from the Commission. The Colt employee that was responsible for regulatory compliance at the time is no longer with the company. Colt, however, has since established a regulatory compliance department to ensure that its international operations adhere to the regulatory requirements of each country in which it operates. Therefore, Colt anticipates that the circumstances that prompted the need for this STA will not be repeated.

The parties to this application acknowledge that the grant of this STA will not prejudice any action the Commission may take on the underlying application. The parties further acknowledge that this STA can be modified or revoked by the Commission upon its own motion without a hearing.

Finally, Colt herein requests that the STA be granted for a period of 180 days, which should be sufficient to secure Commission authorization for the underlying transfer of control application for KVH.