

KVH STA Application

Answer to Question 10

Colt Group S.A. seeks approval for this STA in order to permit Colt to maintain organizational authority over KVH Services LLC (“KVH”) while the Commission considers Colt’s separate application, which was also filed today, seeking approval, *nunc pro tunc*, for the transfer of control of KVH to Colt. The transaction was consummated on December 22, 2014 as a result of an all-cash transaction valued at approximately \$130 million in which Colt purchased all of the issued shares in KVH’s ultimate parent company, KVH Asia Limited. The transaction provided substantial public interest benefits because it enabled Colt to expand further its competitive offering of telecommunications services to its customers in the Asian market.

KVH holds 214 authorization number ITC-214-20101101-00434. Neither Colt nor KVH provide telecommunications services using this 214 authorization because it duplicates other 214 authorizations already held by Colt affiliates. Nevertheless, KVH did not surrender the 214 authorization and therefore this STA is needed while the pending 214 application is processed.

Answer to Question 16

Section 63.18(d)

Colt, through its subsidiaries, holds two 214 authorizations, file numbers ITC-214-20010406-00170 and ITC-214-19990126-00043. Both of these authorize the provision of Global Facilities-Based and Global Resale services.

Section 63.18(e)(3)

Colt hereby certifies that it is in compliance, and will continue to maintain compliance, with the terms and conditions contained in Sections 63.21, 63.22 and/or 63.23 of the Commission’s rules, as applicable.

Section 63.18(g)

This question is not applicable. The application is seeking belated approval for a transfer of control of an existing holder of 214 authority.