



25 May 2007

Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> St. SW  
Washington, DC 20554  
Attn: Marlene Dortch

**Subject:** Application for Transfer of Control of International Section 214 Authorization

**Reference:** 1) Application Submission ID: IB2007001013  
2) File number: C214203091600438

Dear Ms. Dortch,

Please accept my apologies for the errors and incomplete data submitted in the subject application and accept the following corrections and clarifications. The information provided herein is based on a telephone conversation with International Bureau staff member Sumita Mukhoty on 23 May 2007.

**Item 5: Name of Section 214 Authorization Holder:**

- 1) Change "Name" to Global Communications Solutions, Inc.
  - 2) Change "Attention" to Mr. Timothy R. Young
- All other information is correct.

**Item 6: Name of Assignor / Transferor**

- 1) Change "Name" to Global Communications Solutions, Inc.
  - 2) Delete DBA Name; should be blank.
  - 3) Change "Attention" to Mr. Timothy R. Young
- All other information is correct.

**Answer to Question 10:**

In this response, the Transferee and Transferor were inadvertently reversed. The correct responses are provided herein:

**Section 63.18(c) – Contact information**



**Transferor:**

Timothy R. Young  
Director, Satellite Phone Solutions  
7640 Omnitech Place  
Victor, NY 14564  
Phone: 585-742-9132

**Transferee:**

David T. Butler, III  
Sr. Vice President, Business Operations  
600 Third Ave.  
New York, NY 10016  
Phone: 212-805-5446

Section 63.18(d) – Statement regarding other Section 214 authorizations

**Transferor:**

Global Communications Solutions, Inc. has not received any other authorizations under Section 214 of the Communications Act of 1934 other than ITC-214-20030916-00438 which is hereby being transferred.

**Transferee:**

To the best of my knowledge, L-3 Communications Corporation has not previously received any authorizations under Section 214 of the Communications Act of 1934.

**Question 11 additional and corrected information:**

As indicated in the application filing, 100% of GCS stock, owned by Frank York, is being acquired by L-3 Communications Corporation (L-3 Communications), tax ID number 13-3937436.

In the filing, we represented that L-3 Communications stock is publicly traded and that Legg Mason, Inc. owns 11.85% of L-3 Communications. This information is corrected herein as follows:

L-3 Communications is wholly owned by L-3 Communications Holdings (L-3 Holdings), tax ID number 13-3937434, and L-3 Holdings is a publicly traded company.

Per SEC form SC 13G/A filed Feb 8, 2007 by ClearBridge Advisors, LLC (ClearBridge), a Legg Mason company, the total Legg Mason group ownership of L-3 Communications Holdings common stock is 14,485,857 shares, equal to 11.59% of L-3 Holdings common

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stock. Of this, ClearBridge owns 12,859,674 shares (10.3%) with shared voting power and the full 14,485,857 shares (11.59%) with shared power to dispose.

The balance of L-3 Holdings' common stock is owned by miscellaneous shareholders and per Vickers Stock Research report dated 5/25/07, there is no other individual or entity that holds 10% or greater direct or indirect equity and/or controlling interest in L-3 Communications Holdings.

**Revised Answer to Question 13:**

The transfer of control will take place by means of a cash stock purchase, by L-3 Communications Corporation, of 100% of the common stock of Global Communications Solutions, Inc., as follows:

Name of the Agreement: Stock Purchase Agreement

Type of Agreement: Cash purchase and sale of all stock of Global Communications Solutions, Inc.

Parties to the Agreement:

- L-3 Communications Corporation (a Delaware corporation)
- Global Communications Solutions, Inc. (a Virginia corporation)
- Frank York (an individual resident of New York)

Date of Execution of Agreement: March 30, 2007

Type of Stock Sold: Class A Common Shares; Class B Common Shares

Global Communications Solutions, Inc., after closing, will become a direct wholly owned subsidiary of L-3 Communications Corporation.

Please feel free to call me again if there are any additional questions or if any additional information is required.

Sincerely,

Timothy R. Young  
Director, Satellite Phone Solutions  
Global Communications Solutions, Inc.  
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Email : [tyoung@globalcoms.com](mailto:tyoung@globalcoms.com)

cc : Sumita Mukhoty