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DA 08-1659
July 14, 2008

Robert M. Franklin, Trustee, and Inmarsat plc Seek FCC Consent To the Transfer of Control of Stratos Global Corporation and Its Subsidiaries from an Irrevocable Trust To Inmarsat plc

IB Docket No. 08-143

PLEADING CYCLE ESTABLISHED

Petitions to Deny Due: August 13, 2008
Oppositions Due: August 25, 2008
Replies Due: September 2, 2008

I. INTRODUCTION

Robert M. Franklin, Trustee (Mr. Franklin or Trustee), and Inmarsat plc (Inmarsat, and together with Mr. Franklin, Applicants) have filed a series of applications (collectively, Application) pursuant to sections 214 and 310(d) of the Communications Act of 1934, as amended (Communications Act),¹ seeking approval of the indirect transfer of control of Stratos Global Corporation (Stratos Global) and its wholly-owned subsidiaries (collectively, "Stratos Subsidiaries," and together with Stratos Global, "Stratos Licensees") that hold licenses and authorizations from the Commission from an irrevocable trust, for which Mr. Franklin is the trustee, to Inmarsat.

Stratos Global provides mobile satellite service (MSS), fixed satellite service (FSS) and terrestrial communications using, among other things, capacity that it purchases from various satellite operators, including Inmarsat.

The proposed transaction is the second part of a two-part process that began with the 2007 filing of an application seeking Commission approval of the transfer of the stock of Stratos Global to an irrevocable trust (Trust) established under the laws of Canada. The Trust was established by CIP Canada Investment Inc. (CIP Canada), a wholly-owned subsidiary of CIP UK Holdings Limited (CIP UK), which, in turn, is a wholly-owned subsidiary of Communications Investment Partners Limited (CIP).

By Memorandum Opinion and Order released December 7, 2007, the Commission approved the transfer of the stock of Stratos Global from its then shareholders to the Trust, which now holds the stock

¹ 47 U.S.C. §§ 214, 310(d).

for the benefit of CIP Canada.² Under the terms of the Trust, the Trustee has the authority to vote the Stratos Global stock and, subject to his fiduciary obligations, thereby to control Stratos Global.

Inmarsat did not acquire Stratos Global directly because another Inmarsat subsidiary, Inmarsat Global Ltd. (Inmarsat Global), has contractual restrictions that will expire in April, 2009, that forbid Inmarsat Global from owning or controlling Stratos or any other distributor of Inmarsat services. Inmarsat did, however, provide the financing for the transaction through a wholly-owned subsidiary, Inmarsat Finance III Limited (Inmarsat Finance). In the first step of this transaction, Inmarsat Finance entered into a "Facilities Agreement" under which it provided capital for CIP Canada's acquisition of the Stratos Global stock. In turn, CIP granted Inmarsat Finance a "Call Option" to acquire the stock of CIP UK, which is exercisable over a 17-month period beginning in April 2009 and ending on December 31, 2010. Inmarsat, thus, has an irrevocable right to acquire Stratos Global after the contractual restrictions on Stratos Global have expired. Until at least April, 2009, the shares of Stratos Global will be held by the Trust, which gives the Trustee both *de jure* and *de facto* control of Stratos, to ensure compliance with Inmarsat Global's contractual obligations.

II. THE PARTIES

A. The Transferor – the Trustee

The transferor under the proposed transaction is Mr. Franklin, a citizen of Canada, who is the Trustee under the Trust. The Commission's 2007 Memorandum Opinion and Order approved his serving as the Trustee.

B. Stratos Global

In the United States, Stratos Global provides MSS, FSS, and VSAT (very small aperture terminal) satellite services, using satellite capacity that it acquires from other entities. With respect to MSS, Stratos resells satellite services of satellite operators such as Globalstar, Inmarsat, Iridium, and MSV. Stratos holds FCC licenses for Inmarsat mobile earth terminals, but does not own or operate any MSS gateway earth stations in the United States. Stratos provides VSAT services by reselling the services of several providers of FSS systems, such as Intelsat and SES, and using a number of U.S. VSAT hubs that are licensed to Stratos. Further, Stratos operates a terrestrial microwave network in the Gulf of Mexico, which it primarily uses to serve offshore oil and gas drilling platforms. Finally, Stratos provides local exchange, competitive access, and interexchange telecommunications services in Louisiana and Texas, also primarily to oil and gas industry customers.

Three of the Stratos Licensees, Stratos Offshore Services Company (Stratos Offshore), Stratos Communications, Inc. (Stratos Communications), and Stratos Mobile Networks, Inc. (Stratos Networks) (all Delaware corporations), are wholly-owned subsidiaries of a fourth Stratos Licensee, Stratos Holdings, Inc. (Stratos Holdings) (a Delaware corporation). Stratos Holdings is a wholly-owned subsidiary of Stratos Wireless Inc. (Stratos Wireless) (a Canadian corporation) which, in turn, is a wholly-owned subsidiary of Stratos Global (also a Canadian corporation). Stratos Global's corporate headquarters are in Bethesda, Maryland.

² *Stratos Global Corporation, Transferor, Robert M. Franklin, transferee, Consolidated Application for Consent to Transfer of Control*, Memorandum Opinion and Order and Declaratory Ruling, WC Docket No. 07-73, FCC 07-213, 22 FCC Rcd 21328 (2007) (*Stratos Order*).

C. CIP

CIP is a limited partnership organized under the laws of the British Virgin Islands to hold shares of Stratos Global. CIP is a professional investment company that focuses on investments in satellite service companies. The five Directors and sole equity holders of CIP are Hans Lipman (a Dutch citizen), Eric de Jong (a Dutch citizen), Hans van Moorsel (a Dutch citizen), Eric Le Proux (a French citizen), and Victor Horcacas (a dual U.S. and Mexican citizen). Each holds a 20 percent equity and voting interest in CIP.

CIP has established two holding companies to effectuate the proposed transaction: CIP UK (a private limited company incorporated under the laws of England and Wales); and CIP Canada (a Canadian company). CIP Canada is wholly owned by CIP UK, which, in turn, is wholly owned by CIP.

D. Inmarsat Entities

Inmarsat is a public company organized under the laws of England and Wales that was created in 2005 as a result of the privatization of INMARSAT, the International Maritime Satellite Organization.³ Applicants state that Inmarsat's shares are widely held and that at least 89 percent of the equity interests in Inmarsat are owned, and approximately 88 percent of the voting power in Inmarsat is controlled, by individuals who are citizens of, or entities whose principal place of business is, the United States or another World Trade Organization (WTO) Member country.

Inmarsat Global, also organized under the laws of England and Wales, is a subsidiary of Inmarsat that operates a global MSS satellite system that, through its distributors, offers a variety of mobile satellite services. Applicants state that, at present, Inmarsat Global is contractually restricted from selling its services directly to end users, or from owning or controlling a company that distributes its services. Applicants state that Inmarsat Global's current distribution agreements, which contain this restriction, will expire in April, 2009.

Inmarsat Finance, a company incorporated under the laws of England and Wales, is a special-purpose company that was established by Inmarsat for this transaction to provide debt financing to CIP to fund the acquisition of Stratos.

III. THE TRANSACTION

In December, 2007, the Commission authorized the transfer of control of Stratos Global to the Trust. The Trust currently holds the shares of Stratos Global for the benefit of CIP Canada. Mr. Franklin, the Trustee, currently exercises the voting power represented by the Stratos Global shares.

As noted above, CIP granted the lender in this transaction, Inmarsat Finance, an option to acquire the shares of CIP UK. Applicants state that Inmarsat Finance has decided to exercise its option and intends to consummate the proposed transaction on, or shortly after, April 15, 2009, subject to receiving necessary regulatory approvals. Applicants further state that, upon such exercise, the Trust will terminate

³ INMARSAT was an intergovernmental organization that was created by the INMARSAT Convention in 1979 to develop a global maritime satellite system to meet the commercial maritime and safety communications needs of the United States and other countries. See *Comsat Corporation d/b/a Comsat Mobile Communications, et al.*, Memorandum Opinion, Order and Authorization, FCC 01-272, 16 FCC Rcd 21661, 21669, ¶ 3 (2001). INMARSAT privatized in 1999 by converting to a private U.K. company headquartered in London. In 2005, Inmarsat became a public company, Inmarsat plc, listed on the London Stock Exchange.

and CIP Canada will become the holder of the shares (and the associated voting power) of Stratos Global. Inmarsat will then indirectly own and control CIP UK, CIP Canada and Stratos Global.⁴ Applicants state that, in this way, the proposed transaction will effectuate an indirect transfer of control of Stratos Global to Inmarsat.

IV. THE APPLICATION

The Application consists of ten individual applications and documents as follows:

- Four FCC Forms 312 seeking consent for the transfer of Stratos Global's VSAT, FSS and MSS earth station Authorizations;
- Two FCC International applications under Section 214 seeking consent to transfer Stratos Global's various international section 214 Authorizations;
- Two FCC Domestic 214 applications seeking consent to transfer Stratos Global's domestic section 214 authority;
- One FCC Form 603 seeking consent to transfer Stratos Global's various terrestrial radio licenses; and
- One FCC Form 44 seeking consent to transfer Stratos Global's Authorization as an Accounting Authority.

V. SECTION 214 AUTHORIZATIONS

A. International Authorizations

The following applications for consent to the transfer of control of international section 214 authorizations to Inmarsat plc have been assigned the file number listed below:

<u>File No.</u>	<u>Authorization Holder</u>	<u>Authorization Number</u>
ITC-T/C-20080618-00276	Stratos Holdings, Inc.	

International Facilities-Based and Resale Services Authorizations:

ITC-214-20000426-00773
(Associated with ITC-MOD-
2004-0624-00241)
ITC-214-19980828-00591
ITC-214-19980326-00205
ITC-214-19980121-00028
ITC-214-20010220-00657
ITC-MOD-20040624-00241

⁴ Applicants further state that Inmarsat Finance has the ability to assign its right to acquire CIP UK shares to another Inmarsat subsidiary. Applicants state that, if Inmarsat Finance elects to exercise this right, they will file a minor amendment to this Application to reflect any such *pro forma* change to the transaction structure.

Mobile Network Authorizations:

ITC-214-19981214-00859
ITC-214-19970924-00580
ITC-214-19970804-00455
ITC-214-19970627-00356
ITC-214-19961003-00481
ITC-214-19980130-00053
ITC-214-19910301-00010*
(Formerly ITC-90-088)
ITC-214-19901030-00011*
(Formerly ITC-91-012)
ITC-214-19910615-00009*
(Formerly ITC-91-157)
ITC-214-19911206-00008*
(Formerly ITC-92-058)
ITC-214-19911206-00007*
(Formerly ITC-92-059)
ITC-214-19921026-00124*
(Formerly ITC-93-013)
ITC-214-19921026-00123*
(Formerly ITC-93-014)
ITC-214-19910201-00255*
(Formerly ITC-93-141)
ITC-214-19931001-00254*
(Formerly ITC-93-142)
ITC-214-19930511-00253*
(Formerly ITC-93-188)
ITC-214-19950526-00034*
(Formerly ITC-95-359)
ITC-214-19951001-00033*
(Formerly ITC-95-565)
ITC-214-19951001-00032*
(Formerly ITC-95-569)
ITC-214-19960101-00012*
(Formerly ITC-96-041)

* The above File Numbers for the section 214 authorizations marked with an * are new numbers assigned under the IBFS system. The former number for each such authorization is shown below the new number.

Offshore Services Authorizations:

ITC-T/C-20080618-00275 Stratos Offshore Services Company ITC-214-19991220-00815
ITC-214-19980914-00636

Applicants request streamlined processing for both of the above Applications. Applicants assert that the Applications qualify for streamlined processing because Inmarsat is not affiliated with any foreign carrier and because the licensee in each of the Applications, *i.e.*, Stratos Holdings (ITC-T/C-20080618-00276) and Stratos Offshore (ITC-T/C-20080618-00275), qualifies, and post transaction, will continue to qualify, for a presumption of non-dominance under section 63.10(a)(3) of the Commission's

rules, because the foreign carrier that each is affiliated with has less than a 50 percent share of the local access markets in the relevant geographical markets.⁵ Applicants also argue that the Applications qualify for streamlined processing because neither Stratos Holdings nor Stratos Offshore is or will be affiliated with any dominant U.S. carrier whose international switched or private-line services it seeks to resell, *see* 47 C.F.R. § 63.12(c)(2).⁶

In light of the multiple applications before the Commission in this transaction, however, and the public interest review associated with them, we conclude, pursuant to sections 63.12 (c) and (d) of the Commission's rules, that neither of the above international section 214 Transfer of control Applications will be subject to streamlined treatment.⁷

B. Domestic Authorization

Applicants filed two applications for consent to transfer control of the domestic section 214 authority of Stratos Communications and Stratos Offshore from Robert Franklin, Trustee to Inmarsat. The first is for Stratos Communications, Inc., an indirect subsidiary of Stratos Global, which provides nationwide mobile satellite services where the originating and terminating points may both be in the United States. The second is for Stratos Offshore Services Company, a Stratos Communications, Inc. affiliate, which provides wireline services in the United States, primarily in the Gulf of Mexico region.

Applicants assert that these transactions are entitled to presumptive streamlined treatment under sections 63.02(b)(1)(ii) of the Commission's rules because Inmarsat and its subsidiaries do not provide domestic telecommunications services in the United States pursuant to section 214.⁸ Applicants also assert that these transactions are entitled to presumptive streamlined treatment under section 63.03(b)(2)(i) because neither Stratos Communications, its affiliates, nor Inmarsat will have market share in the domestic interstate, interexchange market of ten percent or greater, will not provide competitive telephone exchange services in markets served by a dominant local exchange carrier that is a party to this transaction and operate in a fully competitive environment.⁹

In light of the multiple applications before the Commission in this transaction, however, and the public interest review associated with them, we conclude, pursuant to section 63.03(c) of the Commission's rules, that Applicants' domestic section 214 transfer of control Applications are not subject to streamlined treatment.¹⁰

VI. SECTION 310(d) APPLICATIONS

A. Part 25-Satellite Earth Station, VSAT, and Space Station Authorization Applications

⁵ *See* 47 C.F.R. § 63.10(a)(3) (2007).

⁶ *See* 47 C.F.R. § 63.12(c)(2) (2007).

⁷ *See* 47 C.F.R. § 63.12(c) and (d) (2007).

⁸ 47 C.F.R. § 63.03(b)(1)(ii) (2007).

⁹ 47 C.F.R. § 63.03(b)(2)(i) (2007).

¹⁰ *See* 47 C.F.R. § 63.03(c) (2007).

The following applications for consent to the assignment and transfer of control of satellite earth station, VSAT, and space station authorizations from Robert Franklin (Trustee) to Innmarsat plc have been assigned the file numbers listed below:

<u>File No.</u>	<u>Licensee</u>	<u>Call Sign(s)</u>
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Mobile Earth Terminal Authorizations:

SES-T/C-20080618-00818	Stratos Communications, Inc.	E010050
		E010049
		E010048
		E010047
		E000180
		E050429

Fixed Satellite Service (FSS) Authorizations:

SES-T/C-20080618-00821	Stratos Offshore Services Company	E010263 E070189
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Very Small Aperture Satellite (VSAT) Authorizations:

SES-T/C-20080618-00820	Stratos Offshore Services Company	E950149
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Earth Station on Board Vessels (ESV) Authorizations:

SES-T/C-20080618-00819	Stratos Offshore Services Company	E980235 E070114
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B. Part 90-Wireless Licenses

The following application for consent to the transfer of wireless service licenses from Robert M. Franklin (Trustee) to Innmarsat plc has been assigned the file number listed below:

<u>File No.</u>	<u>Licensee</u>	<u>Lead Call Sign</u>
0003453455	Stratos Offshore Services Company	KD41151

VII. APPLICATION FOR ASSIGNMENT OF ACCOUNTING AUTHORITY STATUS

Pursuant to section 3.20 of the Commission's rules,¹¹ Applicants filed an Application for Certification as an Accounting Authority (FCC Form 44). Applicants note that one of the Stratos Licensees, Stratos Mobile Networks, Inc., is currently certified by the Commission as an Accounting Authority in the maritime mobile and maritime mobile-satellite radio services, holding Accounting Authority Identification Code (AAIC) No. US09.¹² Maritime Mobile and Maritime Mobile-Satellite

¹¹ 47 C.F.R. § 3.20 (2007).

¹² See Notification of Approval as an Accounting Authority, DA 04-758 (rel. March 23, 2004).

communications refer to communications exchanged between two vessels on the high seas or between a vessel and a land radio station. An Accounting Authority is an entity, licensed by a government, that settles accounts for mobile radio stations on vessels licensed by that government, that is, the entity to which a foreign maritime mobile radio station operator may send the bill for the vessel's mobile communications. The Accounting Authority sends the bill to the vessel operator and remits such vessel's payment to the foreign station operator.

Applicants note that they do not, by this application, seek to assign, or otherwise encumber, Stratos Mobile's Accounting Authority status, but seek only to update the ownership and control information in the Commission's files with respect to that Accounting Authority certification. Applicants note that section 3.51 of the Commission's rules requires Accounting Authorities to notify the Commission "in advance of any proposed transfer of control of an accounting authority's firm or organization by any means, to another entity."¹³ Applicants note that notification is required because, under the proposed transaction, control of the ultimate parent corporation of Stratos Mobile, Stratos Global Corporation, is changing from the trustee Robert M. Franklin to Inmarsat plc, a company formed under the laws of England and Wales. Applicants assert that this change to Stratos Mobile's ultimate parent corporation will have no impact on day-to-day Accounting Authority functions currently performed by Stratos Mobile.

Applicants assert that Stratos Mobile does not currently expect to change the way it administers its Accounting Authority function as a result of the proposed transaction. Applicants assert that Stratos Mobile will continue to perform all settlement operations for U.S. licensed vessels through its office in Bethesda, Maryland (USA).

VIII. PETITION FOR DECLARATORY RULING UNDER SECTION 310(b)(4)

The Applicants request a declaratory ruling, pursuant to section 310 (b)(4) of the Communications Act, that it would serve the public interest to allow up to 100 percent indirect non-U.S. ownership of the Stratos Subsidiaries of Stratos Global that hold Commission authorizations and Stratos Global.¹⁴

Applicants note that in its 2007 *Stratos Order*, the Commission approved up to 100 percent foreign ownership of Stratos Global by Inmarsat, Inmarsat Finance, CIP UK, and CIP Canada; and stated that, if Inmarsat Finance were to exercise its option to acquire CIP UK—thereby indirectly acquiring Stratos Global—the Commission would review Inmarsat's foreign ownership again.¹⁵ With the current Application, Inmarsat provides updated information on its ownership and requests the Commission to find that the proposed foreign ownership of Stratos Global after the completion of this transaction to be consistent with the public interest.

According to the Applicants, after consummation of the proposed transaction, 100 percent of the stock of Stratos Global will be owned by CIP Canada (a Canadian corporation). CIP Canada is wholly owned by CIP UK, which will become a wholly-owned subsidiary of Inmarsat Finance, which, in turn is wholly owned by Inmarsat plc. Applicants state that each of CIP UK, Inmarsat Finance and Inmarsat plc is a company formed under the laws of England and Wales. Applicants further state that each of the

¹³ 47 C.F.R. § 3.51 (2007).

¹⁴ 47 U.S.C. § 310(b)(4).

¹⁵ Petition for Declaratory Ruling at 2, citing *Stratos Order*, 22 FCC Rcd at 21370-71, ¶ 102.

entities in the organizational structure between the Stratos Licensees and up to and including Inmarsat plc will hold 100 percent of the equity and voting interests of the entity below it. Moreover, Applicants state that the principal place of business of all these entities will be in the United States, Canada or the United Kingdom.

As noted above, Applicants state that at least 89 percent of the equity interests in Inmarsat are owned, and approximately 88 percent of the voting power in Inmarsat is controlled, by individuals who are citizens of, or entities whose principal places of business are, in the United States or another WTO Member country. According to the Applicants, the following four shareholders hold more than ten percent of the stock of Inmarsat: (1) Harbinger Capital Partners Master Fund I, Ltd a Cayman Islands fund (20 percent); (2) Harbert Fund Advisors, Inc., A U.S. corporation (29 percent); (3) Lansdowne Partners Limited, a company organized in England and Wales (11 percent); and (4) Lehman Brothers (International) Europe, a company organized in England and Wales (11 percent).

Applicants state that the CIP and its subsidiaries, and the CIP principals are all either entities organized under the laws of or are citizens of Canada, the Netherlands, the British Virgin Islands, England and Wales, Mexico or France, all of which are Members of the WTO. As a result, Applicants argue that the presumption in the Commission's Foreign Participation Order¹⁶ that foreign ownership by entities from WTO Member countries in excess of the section 310(b)(4) benchmark will serve the public interest should apply to this Application as well. Thus, Applicants argue that the proposed ownership of the Stratos Licensees is fully consistent with Commission precedent and asks the Commission to find the proposed ownership to be in the public interest. The petition for declaratory ruling has been assigned the file number ISP-PDR-20080618-00013.

IX. EX PARTE STATUS OF THIS PROCEEDING

Pursuant to section 1.1200(a) of the Commission's rules,¹⁷ the Commission may adopt modified or more stringent *ex parte* procedures in particular proceedings if it finds that the public interest so requires. We announce that this proceeding will be governed by permit-but-disclose *ex parte* procedures that are applicable to non-restricted proceedings under section 1.1206 of the Commission's rules.¹⁸

We direct parties making oral *ex parte* presentations to the Commission's statement re-emphasizing the public's responsibility in permit-but-disclose proceedings and are reminded that memoranda summarizing the presentation must contain the presentation's substance and not merely list the subjects discussed.¹⁹ More than a one- or two-sentence description of the views and arguments presented is generally required.²⁰ Other rules pertaining to oral and written presentations are set forth in

¹⁶ *Rules and Policies on Foreign Participation in the U.S. Telecommunications Market*, 12 FCC Rcd 23891.

¹⁷ 47 C.F.R. § 1.1200(a) (2007).

¹⁸ *Id.* § 1.1206.

¹⁹ *See Commission Emphasizes the Public's Responsibilities in Permit-But-Disclose Proceedings*, Public Notice, 15 FCC Rcd 19945 (2000).

²⁰ *See* 47 C.F.R. § 1.1206(b)(2) (2007).

section 1.1206(b) as well.²¹ We urge parties to use the Electronic Comment Filing System (ECFS) to file *ex parte* submissions.²²

X. GENERAL INFORMATION

This Application has been found, upon initial review, to be acceptable for filing. The Commission reserves the right to return any application if, upon further examination, it is determined to be defective and not in conformance with the Commission's rules or policies. Final action on this Application will not be taken earlier than thirty-one (31) days following the date of this Public Notice.²³

Interested parties must file petitions to deny or comments no later than August 13, 2008. Responses or oppositions to comments and petitions must be filed no later than August 25, 2008. Replies to such pleadings must be filed no later than September 2, 2008. All filings concerning matters referenced in this Public Notice should refer to **DA 08-1659, IB Docket No. 08-143**, as well as the specific file numbers of the individual applications or other matters to which the filings pertain.

Under the Commission's procedures for the submission of filings and other documents,²⁴ submissions in this matter may be filed electronically (*i.e.*, though ECFS) or by hand delivery to the Commission's Massachusetts Avenue location.

- **Electronic Filers:**²⁵ Comments may be filed electronically using the Internet by accessing the ECFS: <http://www.fcc.gov/cgb/ecfs/>. In completing the transmittal screen, filers should include their full name, U.S. Postal Service mailing address, and the applicable docket number. Parties also may submit an electronic comment by Internet e-mail. To get filing instructions, filers should send an e-mail to ecfs@fcc.gov, and include the following words in the body of the message, "get form." A sample form and directions will be sent in response.
- **Paper Filers:** Parties who choose to file by paper must file an original and four copies of each filing.

Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail (although we continue to experience delays in receiving U.S. Postal Service mail). All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

²¹ *Id.* § 1.1206(b).

²² See discussion *infra* Part VI.

²³ See 47 U.S.C. § 309(b).

²⁴ See *Implementation of Interim Electronic Filing Procedures for Certain Commission Filings*, Order, 16 FCC Rcd 21483 (2001); see also *FCC Announces a New Filing Location for Paper Documents and a New Fax Number for General Correspondence*, Public Notice, 16 FCC Rcd 22165 (2001); *Reminder: Filing Locations for Paper Documents and Instructions for Mailing Electronic Media*, Public Notice, 18 FCC Rcd 16705 (2003).

²⁵ See *Electronic Filing of Documents in Rulemaking Proceedings*, GC Docket No. 97-113, Report and Order, 13 FCC Rcd 11322 (1998).

The Commission's contractor will receive hand-delivered or messenger-delivered paper filings for the Commission's Secretary at 236 Massachusetts Avenue, N.E., Suite 110, Washington, D.C. 20002. The filing hours at this location are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of before entering the building.

Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.

U.S. Postal Service first-class, Express, and Priority mail should be addressed to 445 12th Street, S.W., Washington, D.C. 20554.

One copy of each pleading must be delivered electronically, by e-mail or facsimile, or if delivered as paper copy, by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail (according to the procedures set forth above for paper filings), to the Commission's duplicating contractor, Best Copy and Printing, Inc., at fcc@bcpiweb.com or (202) 488-5563 (facsimile).

Additionally, filers may deliver courtesy copies by email or facsimile to the following Commission staff:

(1) David Strickland, Policy Division, International Bureau, at David.Strickland@fcc.gov or (202) 418-2824 (facsimile);

(2) John F. Copes, Policy Division, International Bureau, at John.Copes@fcc.gov or (202) 418-2824 (facsimile);

(3) Karl Kensinger, Satellite Division, International Bureau, at Karl.Kensinger@fcc.gov or (202) 418-0748 (facsimile);

(4) Erin McGrath, Wireless Telecommunications Bureau, at Erin.McGrath@fcc.gov or (202) 418-7224 (facsimile);

(5) Jodie Donovan-May, Wireline Competition Bureau, at Jodie.May@fcc.gov or (202) 418-1413 (facsimile);

(6) Regina Dorsey, Office of Managing Director, at Regina.Dorsey@fcc.gov or (202) 418-2843 (facsimile)

(7) Neil Dellar, Office of General Counsel, at Neil.Dellar@fcc.gov or (202) 418-1234 (facsimile).

Copies of the Applications and any subsequently-filed documents in this matter may be obtained from Best Copy and Printing, Inc., in person at 445 12th Street, S.W., Room CY-B402, Washington, D.C. 20554, via telephone at (202) 488-5300, via facsimile at (202) 488-5563, or via e-mail at fcc@bcpiweb.com. The Applications and any associated documents are also available for public inspection and copying during normal reference room hours at the following Commission office: FCC Reference Information Center, 445 12th Street, S.W., Room CY-A257, Washington, D.C. 20554. The Applications also are available electronically through the Commission's ECFS, which may be accessed on the Commission's Internet website at <http://www.fcc.gov>.

People with Disabilities: To request this Public Notice in accessible formats (computer diskette, large print, audio recording, and Braille) send an email to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (voice), 202-418-0432 (tty).

For further information, contact John Copes, Policy Division, International Bureau, at 202-418-1478.

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