

## ATTACHMENT 1

### Notification of the *Pro Forma* Transfer of Control of Holder of International Section 214 Authorizations

This notification relates to the *pro forma* transfer of control of Inmarsat Group Holdings Inc. (“IGHI”), a Delaware corporation, which is the holder of the international Section 214 authorizations listed below:

ITC-214-19901030-00011  
ITC-214-19910301-00010  
ITC-214-19910615-00009  
ITC-214-19911206-00007  
ITC-214-19911206-00008  
ITC-214-19921026-00123  
ITC-214-19921026-00124  
ITC-214-19930201-00255  
ITC-214-19930511-00253  
ITC-214-19931001-00254  
ITC-214-19950526-00034  
ITC-214-19951001-00032  
ITC-214-19951001-00033  
ITC-214-19960101-00012  
ITC-214-19961003-00481  
ITC-214-19970627-00356  
ITC-214-19970804-00455  
ITC-214-19970924-00580  
ITC-214-19980121-00028  
ITC-214-19980326-00205  
ITC-214-19980828-00591  
ITC-214-19981214-00859  
ITC-214-20010220-00657  
ITC-214-20050826-00351  
ITC-MOD-20040624-00241

#### **Answer to Question 10**

All communications in connection with this notification should be directed to the following:

M. Ethan Lucarelli  
Director, Regulatory and Public Policy  
Inmarsat Inc.  
1101 Connecticut Avenue, NW  
Suite 1200  
Washington, D.C. 20036

Adam D. Krinsky  
Timothy J. Cooney  
Wilkinson Barker Knauer, LLP  
1800 M Street, N.W.  
Suite 800 North  
Washington, D.C. 20036

Phone: 202.572.0686  
Fax: 202.248.5177  
[ethan.lucarelli@inmarsat.com](mailto:ethan.lucarelli@inmarsat.com)

Phone: 202.783.4141  
Fax: 202.783.5851  
[akrinsky@wbklaw.com](mailto:akrinsky@wbklaw.com)  
[tcooney@wbklaw.com](mailto:tcooney@wbklaw.com)

In addition to the Section 214 authorizations held by IGHI, its subsidiary Inmarsat Inc. holds international Section 214 authorization ITC-214-20090501-00194 pursuant to an assignment granted under IBFS File No. ITC-ASG-20150112-00009. *See Public Notice: International Authorizations Granted*, 30 FCC Rcd 290, 292 (2015).

### **Answer to Question 11**

IGHI is directly owned 100 percent by U.K.-organized Inmarsat Solutions Ltd., which is a wholly-owned subsidiary of U.K.-organized Inmarsat Finance III Ltd. (“Finance III”). In turn, Finance III is a wholly-owned subsidiary of U.K.-organized Inmarsat New Ventures Ltd., the new entity that replaced Inmarsat Ventures Ltd. in IGHI’s ownership chain. Inmarsat New Ventures Ltd. is a wholly-owned subsidiary of U.K.-organized Inmarsat Investments Ltd., which is a wholly-owned subsidiary of U.K.-organized Inmarsat Group Ltd., which is a wholly-owned subsidiary of U.K.-organized Inmarsat Holdings Ltd., which is a wholly-owned subsidiary of the ultimate parent corporation, U.K.-organized Inmarsat plc (“Inmarsat”). The ownership structure of IGH before and after the *pro forma* transfer of control is depicted on the attached diagrams.

The following entities or individuals hold ten percent or greater interests in Inmarsat plc, and indirectly in the IGHI:

- Lansdowne Partners Limited (“Lansdowne”) (11.53% as of December 31, 2018, aggregate voting power held through management of various Lansdowne investment funds). Lansdowne was formed under the laws of England and Wales.

No other person or entity directly or indirectly holds a ten percent or greater ownership interest in IGHI.

The address, citizenship, and primary business for the interest holders disclosed above are listed on the following page:

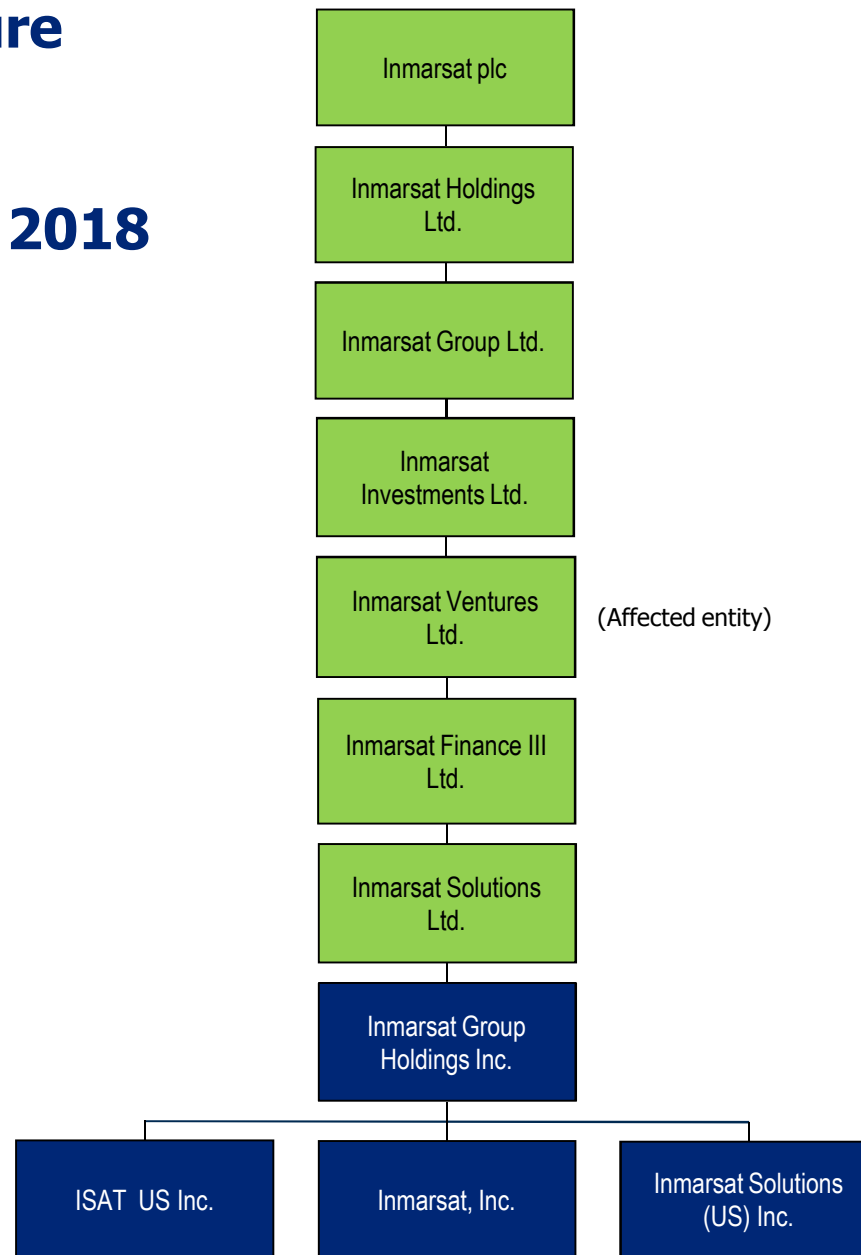
<b>Inmarsat plc</b> 99 City Road London, United Kingdom EC1Y 1AX Citizenship: United Kingdom Primary business: Telecom	<b>Inmarsat Holdings Limited</b> 99 City Road London, United Kingdom EC1Y 1AX Citizenship: United Kingdom Primary business: Holding Company	<b>Inmarsat Group Limited</b> 99 City Road London, United Kingdom EC1Y 1AX Citizenship: United Kingdom Primary business: Provider of global mobile satellite communications services
<b>Inmarsat Investments Limited</b> 99 City Road London, United Kingdom EC1Y 1AX Citizenship: United Kingdom Primary business: Provider of global mobile satellite communications services	<b>Inmarsat New Ventures Limited</b> 99 City Road London, United Kingdom EC1Y 1AX Citizenship: England and Wales Primary business: Holding Company	<b>Inmarsat Finance III Limited</b> 99 City Road London, United Kingdom EC1Y 1AX Citizenship: United Kingdom Primary business: Financing, predominantly through inter-company loans of various investments
<b>Inmarsat Solutions Limited</b> 99 City Road London, United Kingdom EC1Y 1AX Citizenship: England and Wales Primary business: Holding Company	<b>Inmarsat Group Holdings Inc.</b> 1101 Connecticut Avenue, NW Suite 1200 Washington, DC 20036 Citizenship: United States Primary business: Holding Company	<b>Landsdowne Partners Limited</b> 15 Davies Street London, United Kingdom W1K 3AG Citizenship: United Kingdom Primary business: Investment

**Answer to Question 13**

The *pro forma* transfer of control took place November 19, 2018, as part of an internal reorganization dictated by the upcoming exit of the United Kingdom (“U.K.”) from the European Union (“Brexit”). The reorganization replaced one U.K. entity (Inmarsat Ventures Ltd.) with a new U.K. entity (Inmarsat New Ventures Ltd.) in the middle of IGHI’s ownership chain, resulting in no change whatsoever in the ultimate ownership and control of the IGHI. The new entity has no employees and has the same board of directors as the former entity.

The internal reorganization (conducted through a series of share/subsidiary transfers) was necessitated by the fact that Inmarsat Ventures Ltd. held a European Union spectrum authorization, and the holder of that authorization needed to be domiciled in the European Union by the time of Brexit. For that reason Inmarsat Ventures Ltd. was removed from the ownership chain above the IGHI, and Inmarsat New Ventures Ltd. was inserted in its place in IGHI’s ownership chain. IGHI first became aware in January 2019 (during the partial federal government shutdown) that the *pro forma* transfer of control in the United Kingdom portion of its ownership chain had taken place. Pursuant to 47 CFR § 63.24(f), the prior approval of the FCC was not required for this *pro forma* transfer of control; but a post-consummation notification is required within 30 days after the transaction. IGHI is filing this notification as quickly as possible after the FCC’s International Bureau Filing System re-opened following the suspension of operations due to the partial federal government shutdown. IGHI regrets this inadvertent lapse and requests a waiver of the deadline.

# Ownership Structure of Inmarsat Earth Station Licensees Pre-November 19, 2018

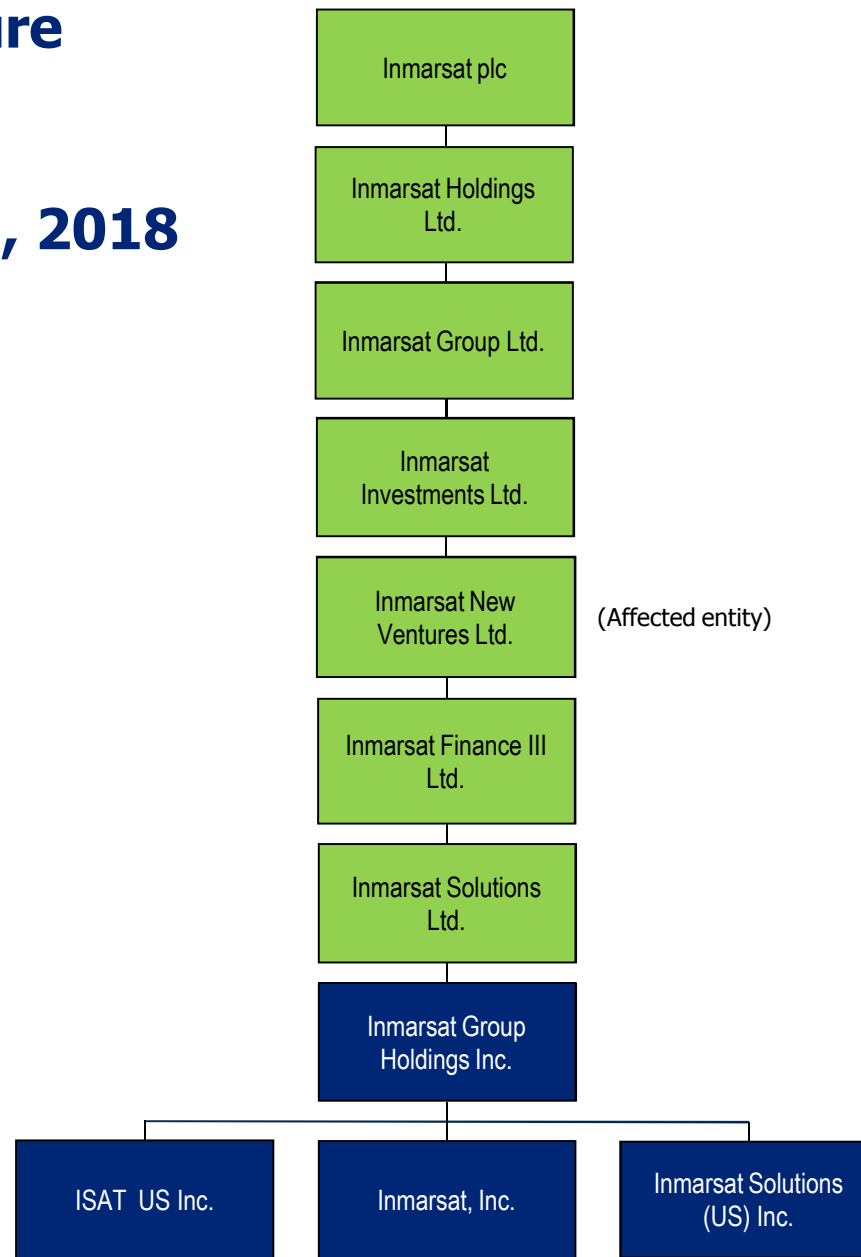


## Legend

UK

US

# Ownership Structure of Inmarsat Earth Station Licensees Post-November 19, 2018



## Legend

