

WILKINSON) BARKER) KNAUER) LLP

1800 M STREET, NW
SUITE 800N
WASHINGTON, DC 20036
TEL 202.783.4141
FAX 202.783.5851
WWW.WBKLaw.COM
TIMOTHY J. COONEY
(202) 383-3361
TCOONEY@WBKLAW.COM

April 30, 2019

Via IBFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Section 1.65 update: IBFS File No. ITC-T/C-20190128-00063

Dear Ms. Dortch:

This letter is written on behalf of Inmarsat Group Holdings Inc. (“IGHI”), pursuant to Section 1.65 of the FCC’s rules, with respect to the above-referenced notification of the *pro forma* transfer of control of 25 international Section 214 authorizations then in the name of IGHI.

By the attached letter dated April 10, 2019, IGHI surrendered 24 of the 25 international Section 214 authorizations listed in IBFS File No. ITC-T/C-20190128-00063. Public Notice of the surrenders was issued April 18, 2019.¹ As a result of the surrenders, only ITC-214-19980121-00028 remains subject to pending IBFS File No. ITC-T/C-20190128-00063. As stated in the attached surrender letter, IGHI is retaining both ITC-214-19980121-00028 and ITC-214-20090501-00194 (most recently in the name of ISAT US Inc., but assigned to IGHI on a *pro forma* basis in IBFS File No. ITC-ASG-20190409-00100).

Please contact the undersigned if you have any questions.

Respectfully submitted,

/s/ Timothy J. Cooney

Attachment

¹ FCC Public Notice, *International Authorizations Granted*, DA 19-299 (IB Apr. 18, 2019).



1101 Connecticut Avenue, NW
Suite 1200
Washington, DC 20036
USA

April 10, 2019

Via IBFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Surrenders of Certain International 214 Authorizations of Inmarsat Group Holdings Inc.

Dear Ms. Dortch:

By this letter, Inmarsat Group Holdings Inc. ("IGHI") surrenders the 24 international Section 214 authorizations listed below as duplicative and unnecessary:

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

IGHI will retain two international 214 authorizations to allow it and its 100 percent subsidiaries (under 47 C.F.R. § 63.21(h)) to provide international common carrier services:

- ITC-214-19980121-00028, in the name of IGHI authorizing international common carrier services under Sections 63.18(e)(1) and 63.18(e)(2) of the Commission's rules; and
- ITC-214-20090501-00194, most recently in the name of ISAT US Inc., but assigned to IGHI on a pro forma basis, authorizing international common carrier services under Section 63.18(e)(3) of the Commission's rules.

A separate Section 63.21(h) notification regarding the relevant subsidiaries will be made in these two IBFS files.

Please let me know if you have any questions.

Respectfully submitted,

/s/ M. Ethan Lucarelli

M. Ethan Lucarelli
Director, Regulatory & Public Policy
Inmarsat