# **ATTACHMENT 1**

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

This notification relates to the *pro forma* transfer of control of Inmarsat Inc. ("Inmarsat"), a Delaware corporation, which is the holder of the international Section 214 authorization ITC-214-20090501-00194.

### 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 Phone: 202.572.0686 Fax: 202.248.5177 <u>ethan.lucarelli@inmarsat.com</u> Adam D. Krinsky Timothy J. Cooney Wilkinson Barker Knauer, LLP 1800 M Street, N.W. Suite 800 North Washington, D.C. 20036 Phone: 202.783.4141 Fax: 202.783.5851 <u>akrinsky@wbklaw.com</u> tcooney@wbklaw.com

In addition to the Section 214 authorizations held by Inmarsat Inc., its parent, U.S.organized Inmarsat Group Holdings Inc. ("IGHI"), holds the following international Section 214 authorizations:

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

#### <u>Answer to Question 11</u>

Under the reorganized ownership chain, Inmarsat Inc. is directly owned 100 percent by U.S.-organized Inmarsat Group Holdings, Inc. ("IGHI") 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 the 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 Group Ltd., which is a wholly-owned subsidiary of U.K.-organized Inmarsat Holdings Ltd., which is a wholly-owned subsidiary of U.K.-organized Inmarsat Plc ("Inmarsat"). The ownership structure of Inmarsat Inc. 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 Inmarsat Inc.:

• 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 Inmarsat Inc.

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

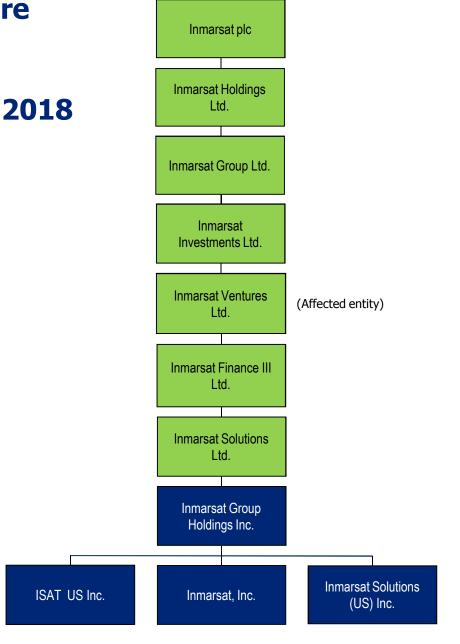
Inmarsat plc	Inmarsat Holdings Ltd.	Inmarsat Group Limited
99 City Road	99 City Road	99 City Road
London, United Kingdom	London, United Kingdom	London, United Kingdom
EC1Y 1AX	EC1Y 1AX	EC1Y 1AX
Citizenship: United Kingdom	Citizenship: United Kingdom	Citizenship: United Kingdom
Primary business: Telecom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

### 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 Inmarsat Inc.'s ownership chain, resulting in no change whatsoever in the ultimate ownership and control of Inmarsat Inc. 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 satellite 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 Inmarsat Inc., and Inmarsat New Ventures Ltd. was inserted in its place in the ownership chain. Inmarsat Inc. 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. Under 47 CFR § 63.24(f), the prior approval of the FCC was not required for this *pro forma* transfer of control; but a notification was supposed to have been submitted within 30 days after the transaction. Inmarsat Inc. regrets this inadvertent lapse, requests a waiver of the deadline, and is filing this notification as quickly as possible after the FCC's electronic system re-opened after the partial federal government shutdown.

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

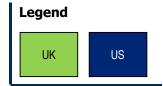




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**Ownership Structure of Inmarsat Earth Station Licensees Post-November 19, 2018** 





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