LATHAM&WATKINSLP

June 10, 2004

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

Dear Ms. Dortch:

FIRM / AFFILIATE OFFICES RECEIVED Brussels New York Chicago Northern Virginia Frankfurt Orange County JUN 1 0 2004 Hamburg Paris Hong Kong San Diego FEDERAL COMMUNICATIONS COMMISSION San Francisco London OFFICE OF THE SECRETARY Los Angeles Silicon Valley Milan Singapore Moscow Tokyo Washington, D.C. Inti Burnational Bureau JUN 1 9 2004 Re: Ex Parte Submission From Office File No. SAT-MSC-20040210-00027

EX PARTE OR LATE FILED

555 Eleventh Street, N.W., Suite 1000 Washington, D.C. 20004-1304 Tel: (202) 637-2200 Fax: (202) 637-2201

This letter responds to a question from Commission staff about whether any former Inmarsat signatories are investors in the funds advised by Apax Partners and Permira that own 52.28% of Inmarsat. In short, the answer is "no." In the interest of full disclosure, however, additional information about certain foreign investors in those funds is provided below.

A number of affiliated funds known as "Apax Europe V" collectively own 26.14% of Inmarsat. Their investment in Inmarsat represents about 3.3% of their total invested capital. A number of affiliated funds known as "Permira Europe III" collectively own 26.14% of Inmarsat. Their investment in Inmarsat represents about 2.9% of their total invested capital.

No former signatory holds an interest in Inmarsat through an investment in any Apax Europe V fund or any Permira Europe III fund. However, certain foreign entities participate in these funds through passive, limited partner interests, which allow no active involvement in decisions about the management of the companies in which the funds invest.

In the case of the Apax Europe V funds, one foreign limited partner investor is a pension fund of a former signatory. Another limited partner investor is a foreign government that has invested in the Apax Europe V funds through a different legal entity than its former signatory. The aggregate interests of these two limited partners represent 6.36% of the Apax Europe V funds, and therefore represent a 1.66% indirect ownership interest in Inmarsat. These are passive investments.

LATHAM & WATKINS LLP

In the case of the Permira Europe III funds, four limited partner investors are foreign governments that have invested in the Permira Europe III funds through different legal entities than their former signatories. The aggregate interests of these four limited partners represent 9.3% of the Permira Europe III funds, and therefore represent a 2.43% indirect ownership interest in Inmarsat. These, too, are passive investments.

Please let us know if you need any additional information.

Respectfully submitted,

John P. Janka

Alexander D. Hoehn-Saric LATHAM & WATKINS LLP

555 11th Street, N.W., Suite 1000

Washington, D.C. 20004 (202) 637-2200 (phone) (202) 637-2201 (fax)

Counsel for Inmarsat Ventures Limited

cc: Neil Dellar

Stephen Duall

Eliot Greenwald

Dan Harrold

Bruce Henoch

David Horowitz

Bruce Jacobs

Andrea Kelly

Karl Kensinger

Selina Khan

JoAnn Lucanik Alfred Mamlet

Marilyn Simon

Phil Spector

rini specio

Cassandra Thomas

Tom Tycz

Qualex International

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of June, 2004, I caused a true copy of the foregoing "Ex Parte Submission" to be served by first-class mail and, where noted, by hand (*) on the following:

Neil Dellar*
Office of General Counsel
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Stephen Duall*
Satellite Division
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Dan Harrold *
Office of General Counsel
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

David Horowitz*
Office of General Counsel
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Andrea Kelly*
Satellite Division
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Karl Kensinger*
Satellite Division
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Selina Khan*
Satellite Division
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

JoAnn Lucanik*
Policy Division
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Marilyn Simon*
Satellite Division
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Cassandra Thomas*
Satellite Division
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Tom Tycz*
Satellite Division
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Eliot Greenwald Swidler Berlin Shereff Firedman, LLP 3000 K Street, N.W., Suite 300 Washington, DC 20006 Counsel for Deere & Company Bruce Henoch Assistant General Counsel Telenor Satellite Services, Inc. 1101 Wootton Parkway, 10th Floor Rockville, MD 20852 Counsel for Telenor Satellite Services, Inc.

Bruce D. Jacobs
Shaw Pittman LLP
2300 N Street, N.W.
Washington, DC 20037
Counsel for Mobile Satellite Ventures Subsidiary LLC

Alfred M. Mamlet Steptoe & Johnson LLP 1330 Connecticut Avenue, N.W. Washington, DC 20036-1795 Counsel for Stratos Mobile Networks Inc. and Stratos Communications, Inc.

Phillip L. Spector
Paul, Weiss, Rifkind, Wharton & Garrison LLP
1615 L Street, N.W.
Suite 1300
Washington, DC 20036
Counsel for SES Americom

Qualex International*
Portals II
Room CY-B402
445 12th Street, S.W.
Washington, DC 20554

Sarah Raison