

January 29, 2018

VIA IBFS

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20054

> Re: Section 1.65 Update Call Sign S2986

IBFS File Nos. SAT-LOA-20161115-00121 and SAT-AMD-20170301-00029 Update to Application of Theia Holdings A, Inc. for Authority to Launch and Operate a Non-Geostationary Satellite Orbit System in the Fixed-Satellite Service, Mobile-Satellite Service and Earth-Exploration Satellite Service

Dear Ms. Dortch:

Pursuant to Sections 1.65 and 25.116 of the rules of the Federal Communications Commission ("FCC"), Theia Holdings A, Inc. ("Theia") hereby respectfully submits this letter ("Letter") to provide updated information regarding the ownership of Theia. Specifically, by this Letter, Theia updates the ownership information reported in the above-referenced application, as amended ("Application"), in response to FCC Form 312, Question 40 to reflect minor changes in the (i) officers and directors of Theia and (ii) interests of the stockholders that own, directly or indirectly, 10% or more of Theia's capital stock. Attached is a revised response to Question 40 to reflect these changes. No other changes are made to the Application by this Letter.

¹ See Application of Theia Holdings A, Inc. for Authority to Launch and Operate a Non-Geostationary Satellite Orbit System in the Fixed-Satellite Service, Mobile-Satellite Service and Earth-Exploration Satellite Service, File No. File No. SAT-LOA-20161115-00121, Call Sign S2986 ("TSN Application"); Application Amendment, File No. File No. SAT-AMD-20170301-00029, Call Sign S2986 (amending TSN Application to include the 37.5-42.5 GHz (space-to-Earth) and the 47.2-50.2 and 50.4-51.4 GHz (Earth-to-space) bands in the Theia Satellite Network ("TSN") for high capacity communication links between TSN spacecraft and a limited number of individually licensed gateway and gateway-like earth stations.).

² On September 18, 2017, at the advice of the staff of the International Bureau, Theia submitted a Section 1.65 Notification to update and revise the ownership information reported in response to FCC Form 312, Question 40. *See* Theia Holdings A, Inc., Section 1.65 Notification, Updated Ownership Exhibit, SAT-LOA-20161115-00121 (filed Sept. 18, 2017) ("September 2017 Update"). The instant filing further updates and revises the ownership information set forth in the September 2017 Update.

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Please do not hesitate to contact the undersigned with any questions regarding this matter.

Respectfully submitted,

James Hickey

General Counsel & Secretary

Theia Holdings A, Inc.

1600 Market Street

Suite 1320

Philadelphia, PA 19103

Enclosure

Theia Holdings A, Inc. *FCC Form 312, Question 40* (amended as of January 29, 2018)

The applicant, Theia Holdings A, Inc. is a Delaware corporation which is 100% wholly owned and controlled subsidiary of Theia Group, Inc. Theia Group, Inc. is a Delaware corporation with its principal offices located at 1600 Market Street Suite 1320 Philadelphia PA 19103. That address also serves as the address of Theia Holdings A, Inc. Below, the required information relating to management, ownership and corporate organization is provided and updated.

Officers and Directors

Name	Title	Citizenship	Address
General Ronald Fogleman (ret)	Director	USA	406 Snowcap Lane
3 , ,			Durango CO USA
Stephen O'Neill	Officer &	USA 18845 Rockinghorse Lane	
1	Director		Huntington Beach CA USA
Frances Cook	Director	USA	1801 South Flagler Drive #1605
			West Palm Beach FL USA
Panos Voutyritsas	Director	Greece	58 Waterstone Estate
			Benmore Gardens
			Republic of South Africa
John Gallagher	Director	USA	127 Lori Lane
St. Selection of the Control of the			Broomall PA 19008
Joseph D. Fargnoli	Officer	USA	693 East Ave, Suite 103
			Rochester NY USA
Erlend Olson	Officer	USA	8909 Rio Grande NW
			Los Ranchos NM USA
James Hickey	Officer/	USA 1600 Market Street Suite 1320	
* ************************************	Secretary		Philadelphia PA USA

Stockholders owning and/or voting 10 percent or more of Theia's capital stock

Name	Address	Citizenship (Place of Incorporation)	Percent of Voting & Equity
Meridian Vector Corporation ³	1600 Market Street St 1320 Phil PA USA 19103	USA (Delaware)	55.02%
RITRE Corporation ⁴	693 East Ave, Suite 103 Rochester NY USA 14607	USA (New York)	10.70%
Gluon Holdings Limited ⁵	Coastal Building, 2nd Floor Wickham's Cay II Road Town, Tortola, BVI	British Virgin Islands	22.29%

³ 92% of the capital stock of Meridian Vector Corporation is owned by John Gallagher Esq., a US citizen, having an address of 127 Lori Lane, Broomall, Pennsylvania.

⁴ 100% of the capital stock of RITRE Corporation is held by Joseph Fargnoli, a US citizen, having an address as indicated above in his capacity as an officer.

⁵ 100% of the capital stock of Gluon Holdings Limited is owned by the PV Trust, a British Virgin Islands trust, the beneficiary of which is Panos Voutyritsas, a Greek citizen, having an address as indicated above in his capacity as a director.

Theia Holdings A, Inc. *FCC Form 312, Question 40* (amended January 29, 2018)

No other individuals or entities directly or indirectly hold a 10 percent or greater ownership or voting interest in Theia.⁶

⁶ Stephen O'Neill previously was identified as holding 10.0% of Theia's capital stock. *See* Theia Holdings A, Inc., Section 1.65 Notification, Updated Ownership Exhibit, SAT-LOA-20161115-00121 (filed Sept. 18, 2017). Mr. O'Neill no longer holds 10% or more of Theia's capital stock and thus has been deleted from the table in the text.