

LATHAM & WATKINS LLP

November 23, 2004

BY HAND

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

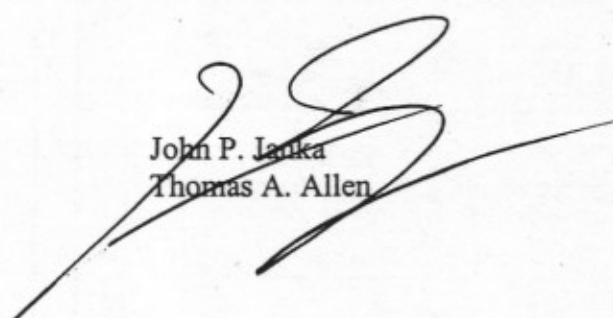
Re: SAT-MS-20040210-00027
Request for Declaratory Ruling

Dear Ms. Dortch:

On November 15, 2004, Inmarsat Group Holdings Limited, the ultimate parent company of Inmarsat Ventures Limited (together with its subsidiaries, "Inmarsat"), submitted a Request for Declaratory Ruling and Certification pursuant to Section 621(5)(F) of the Open-Market Reorganization for the Betterment of International Telecommunications Act (the "ORBIT Act"). As noted in the transmittal letter to that submission, only a copy of the Certification of Andrew Sukawaty was contained therein. Please find attached hereto an original, executed copy of the Certification.

If you have any questions regarding this matter, please contact me at (202) 637-2289.

Very truly yours,


John P. Janke
Thomas A. Allen

Enclosures

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CERTIFICATION OF INMARSAT GROUP HOLDINGS LIMITED

I, Andrew Sukawaty, Chairman and Chief Executive Officer for Inmarsat Group Holdings Limited (together with its subsidiaries, "Inmarsat"), declare under penalty of perjury as follows:

- (i) Inmarsat has achieved substantial dilution of the aggregate amount of former signatory financial interest in Inmarsat;
- (ii) Any signatories or former signatories that retain a financial interest in Inmarsat do not possess, together or individually, effective control of Inmarsat;
- (iii) No intergovernmental organization has more than a minimal ownership interest in Inmarsat; and,
- (iv) I have read the foregoing Request for Declaratory Ruling and the Attachments thereto. The representations contained therein are true and correct to the best of my knowledge, information, and belief.

Inmarsat Group Holdings Limited

By: 

Andrew Sukawaty
Chairman and Chief Executive Officer

Executed on: November 15, 2004