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December 16, 2004

BY HAND

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

RECEIVED

DEC 17 2004

Federal Communications Commission
Office of Secretary

Received

DEC 28 2004

Policy Branch
International Bureau

Re: *Supplemental Submission*
SAT-MS-20040210-00027
Request for Declaratory Ruling

Dear Ms. Dortch:

This letter is submitted on behalf of Inmarsat Group Holdings Limited ("Inmarsat") to supplement its November 15, 2004 Request for Declaratory Ruling in this matter (the "Request").

In the Request, Inmarsat addressed, among other things, the requirement in Section 621(5)(F)(i) of the ORBIT Act that "no intergovernmental organization has...more than a minimal ownership interest in a successor entity of Inmarsat."¹ Namely, Inmarsat explained that:

- the International Mobile Satellite Organization ("IMSO") is the only intergovernmental organization that has any ownership interest in Inmarsat;
- IMSO is a residual entity left in place by the Inmarsat Assembly of Parties when the decision to privatize Inmarsat was made in early 1999;
- IMSO's sole involvement in Inmarsat is the oversight of certain public services, mainly the continued provision of space segment capacity for the global maritime distress and safety system ("GMDSS"); and

¹ ORBIT Act at § 621(5)(F)(i)(III).

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- IMSO's ownership in Inmarsat is limited to a "special share" of Inmarsat Ventures Limited that confers neither any normal voting rights nor any rights to participate in Inmarsat's profits; it only gives IMSO the right to veto any proposals to amend those provisions of the Memorandum of Association or Articles of Association of Inmarsat Ventures Limited that relate to Inmarsat's public service obligations, especially GMDSS.

Inmarsat hereby confirms that the nature and extent of IMSO's limited ownership interest in Inmarsat remain as they were in 2001 when the Commission determined that the sole ownership interest in Inmarsat held by IMSO constitutes "minimal ownership" by an intergovernmental organization within the meaning of the Orbit Act.² Moreover, based on its review of distress alert data from the Distress Alert Quality Control System (DAQCS), Inmarsat has determined that GMDSS-related traffic on the Inmarsat system accounts for less than 1% of Inmarsat's total revenues for the twelve months ended October 31, 2004.

Respectfully submitted,

Inmarsat Group Holdings Limited

By: 

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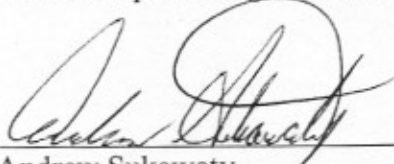
² See In the Matter of Comsat Corporation d/b/a Comsat Mobile Communications, *et al.*, 16 FCC Rcd 21,661, 21,686 (2001).

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 Inmarsat's November 15, 2004 Request for Declaratory Ruling and the Attachments thereto, as supplemented by the foregoing letter dated December 16, 2004. The representations contained therein are true and correct.

Inmarsat Group Holdings Limited

By: 

Andrew Sukawaty
Chairman and Chief Executive Officer

Executed on: December 16, 2004