### **DESCRIPTION OF OWNERSHIP**

## Response to Question 34

Inmarsat Solutions (US) Inc. (formerly known as Stratos Communications, Inc.)<sup>1</sup> ("Licensee") is a wholly-owned direct subsidiary of Stratos Holdings, Inc. ("Stratos Holdings"). Stratos Holdings is held by Inmarsat US Investments Limited (100% of the preferred shares), its parent Inmarsat US Services LLC (20% of the common shares), and its parent Inmarsat Group Holdings Inc. (80% of the common shares). Inmarsat Group Holdings Inc. is a wholly-owned subsidiary of Inmarsat Solutions Ltd,<sup>2</sup> which is a wholly-owned subsidiary of Inmarsat Finance III Limited ("Finance III"). In turn, Finance III is a wholly-owned subsidiary of Inmarsat Ventures Ltd, a wholly-owned subsidiary of Inmarsat Group Ltd, which is a wholly-owned subsidiary of Inmarsat Holdings Ltd, which is a wholly-owned subsidiary of Inmarsat Holdings Ltd, which is a wholly-owned subsidiary of Inmarsat plc ("Inmarsat").

The organizational chart attached to this exhibit reflects the ownership chain of the Licensee.

Inmarsat plc is a widely-held public company traded on the London Stock Exchange. The following entities or individuals hold ten percent or greater interests in Inmarsat plc, and indirectly in the Licensee: Lansdowne Partners Limited ("Lansdowne") (13.04%, aggregate voting power held through management of various Landsdowne 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 the Licensee.

The Commission has previously approved the indirect foreign ownership in the Licensee,<sup>3</sup> and it has approved the current ownership structure.<sup>4</sup> Accordingly, the instant application does not raise any new issues.

The address, citizenship, and principle business for the interest holders disclosed above are as follows:

<sup>&</sup>lt;sup>1</sup> Notice of the name change was submitted to the FCC via IBFS by letter dated February 23, 2102, re Call Signs E000180, E010047, E010048, E010049, E010050, and E050249. A copy of the letter is appended to this exhibit.

<sup>&</sup>lt;sup>2</sup> Inmarsat Solutions Ltd was formerly known as CIP UK Holdings Limited.

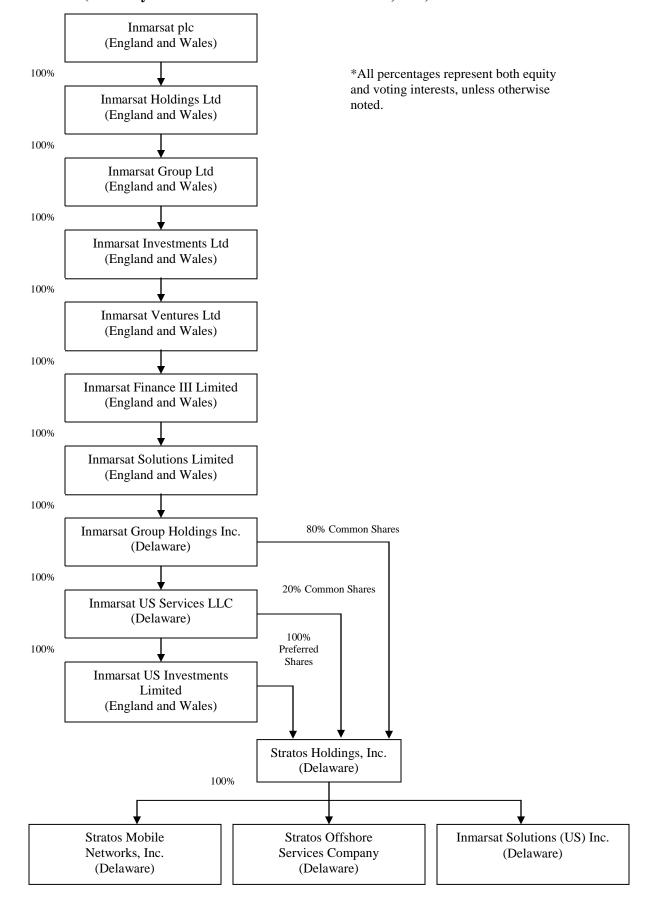
<sup>&</sup>lt;sup>3</sup> See Robert M. Franklin, Transferor and Inmarsat, PLC, Transferee, Consolidated Application for Consent to Transfer of Control of Stratos Global Corporation and Its Subsidiaries from an Irrevocable Trust to Inmarsat, plc, Memorandum Opinion and Order and Declaratory Ruling, 24 FCC Rcd 449 (IB 2009).

<sup>&</sup>lt;sup>4</sup> See SES-T/C-20100610-00688 (granted June 29, 2010).

Stratos Holdings, Inc.	Inmarsat Solutions Ltd.	Inmarsat Finance III Limited
6550 Rock Spring Drive	1200 Eighteenth Street, NW	99 City Road
Suite 650	Washington, DC 20036	London, United Kingdom
Bethesda, MD 20187	Citizenship: United Kingdom	EC1Y 1AX
Citizenship: United States	Principle business: Investment	Citizenship: United Kingdom
Principle Business: Telecom		Principle business: Investment
Inmonget Cuern Heldings Inc	Immongat Cuann Limited	Inmonact Holdings Limited
Inmarsat Group Holdings Inc. 1101 Connecticut Avenue, NW	Inmarsat Group Limited 99 City Road	Inmarsat Holdings Limited 99 City Road
Suite 1225	London, United Kingdom	London, United Kingdom
Washington, DC 20036	EC1Y 1AX	EC1Y 1AX
Citizenship: United States	Citizenship: England and Wales	Citizenship: England and Wales
Principle business: Investment	Principle business: Investment	Principle business: Investment
Finiciple business. Investment	Finiciple business. Investment	Finiciple business. Investment
Inmarsat Investments Limited	Inmarsat plc	Inmarsat US Services LLC
99 City Road	99 City Road	1101 Connecticut Avenue, NW
99 City Road London, United Kingdom		1101 Connecticut Avenue, NW Suite 1225
	99 City Road	· ·
London, United Kingdom	99 City Road London, United Kingdom EC1Y 1AX Citizenship: United Kingdom	Suite 1225 Washington, DC 20036 Citizenship: United States
London, United Kingdom EC1Y 1AX	99 City Road London, United Kingdom EC1Y 1AX	Suite 1225 Washington, DC 20036
London, United Kingdom EC1Y 1AX Citizenship: England and Wales Principle business: Investment	99 City Road London, United Kingdom EC1Y 1AX Citizenship: United Kingdom Principle business: Telecom	Suite 1225 Washington, DC 20036 Citizenship: United States Principle business: Investment
London, United Kingdom EC1Y 1AX Citizenship: England and Wales Principle business: Investment  Inmarsat US Investments	99 City Road London, United Kingdom EC1Y 1AX Citizenship: United Kingdom Principle business: Telecom  Inmarsat Ventures Limited	Suite 1225 Washington, DC 20036 Citizenship: United States Principle business: Investment  Landsdowne Partners Limited
London, United Kingdom EC1Y 1AX Citizenship: England and Wales Principle business: Investment  Inmarsat US Investments Limited	99 City Road London, United Kingdom EC1Y 1AX Citizenship: United Kingdom Principle business: Telecom  Inmarsat Ventures Limited 99 City Road	Suite 1225 Washington, DC 20036 Citizenship: United States Principle business: Investment  Landsdowne Partners Limited 15 Davies Street
London, United Kingdom EC1Y 1AX Citizenship: England and Wales Principle business: Investment  Inmarsat US Investments Limited 99 City Road	99 City Road London, United Kingdom EC1Y 1AX Citizenship: United Kingdom Principle business: Telecom  Inmarsat Ventures Limited 99 City Road London, United Kingdom	Suite 1225 Washington, DC 20036 Citizenship: United States Principle business: Investment  Landsdowne Partners Limited 15 Davies Street London, United Kingdom
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London, United Kingdom EC1Y 1AX Citizenship: England and Wales Principle business: Investment  Inmarsat US Investments Limited 99 City Road London, United Kingdom EC1Y 1AX	99 City Road London, United Kingdom EC1Y 1AX Citizenship: United Kingdom Principle business: Telecom  Inmarsat Ventures Limited 99 City Road London, United Kingdom EC1Y 1AX Citizenship: England and Wales	Suite 1225 Washington, DC 20036 Citizenship: United States Principle business: Investment  Landsdowne Partners Limited 15 Davies Street London, United Kingdom W1K 3AG Citizenship: United Kingdom

# OWNERSHIP AND CONTROL OF INMARSAT SOLUTIONS (US) INC.

(formerly known as Stratos Communications, Inc.)



2300 N STREET, NW SUITE 700 WASHINGTON, DC 20037 TEL 202.783.4141 FAX 202.783.5851 WWW.WBKLAW.COM

### February 23, 2012

### **VIA IBFS**

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

Attn.: Robert Nelson, Chief

Satellite Division, International Bureau

Re: Inmarsat Solutions (US) Inc. (f/k/a Stratos Communications, Inc.)

Call Signs: E000180, E010047, E010048, E010049, E010050 and E050249

Notification of Name Change

Dear Ms. Dortch:

Stratos Communications, Inc. ("SCI") is the licensee of the above-referenced earth station licenses. On February 21, 2012, SCI changed its name to Inmarsat Solutions (US) Inc. The change is purely to the name of the entity, and is not the result of any change of ownership or business type. Please update the Commission's records accordingly.

If you have any questions regarding this notification, please contact the undersigned.

Sincerely,

Christine M. Crowe

William R. Layton

Counsel for Inmarsat Solutions (US) Inc.

Cc: Jeanette Spriggs, FCC