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October 23, 2013

Via IBFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-A325
Washington, DC 20554

**Re: IBFS File Nos. SES-ASG-20130815-00736 & SES-ASG-20130815-00737-
Applications of Stratos Offshore Services Company to Assign Earth Station
Licenses to RigNet SatCom, Inc.**

Dear Ms. Dortch:

On behalf of RigNet SatCom, Inc. ("RigNet"), this letter is being submitted in the above-referenced proceedings to provide a copy of a letter filed in connection with RigNet's Petition for Declaratory Ruling pending in File No. ISP-PDR-20130815-00004.

Please contact the undersigned if you have any questions concerning this filing.

Respectfully submitted,

/s/ Denise Wood

Catherine Wang
Denise Wood

Counsel for RigNet Satcom, Inc.

cc (via email): Christine Crowe, Stratos

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Proceedings List

File Number	Call Sign	Applicant
ITC-ASG-20130815-00212		RigNet SatCom, Inc.
ISP-PDR-20130815-00004		RigNet SatCom, Inc.

Non-Confidential Attachment(s)

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Proceeding

Name	Subject
13-224	Joint Application Section 214 of RigNet Satcom, Inc. and Stratos Offshore Services Company

Contact Info

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Via IBFS & ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
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Re: IBFS File No. ISP-PDR-20130815-00004; IBFS File No. ISP-ASG-20130815-00212; WC Docket No. 13-224

Dear Ms. Dortch:

This letter clarifies certain information submitted by RigNet SatCom, Inc. (“RigNet”) in supplements (“Supplements”) filed on September 30, 2013, in connection with the RigNet Petition for Declaratory Ruling under Section 310(b)(4) and applications for approval to assign FCC authorizations and assets in connection with the proposed sale of certain assets by Stratos Offshore Services company to RigNet in the above-referenced proceedings.

Sale of Stock and Exercise of Warrants Has Occurred: RigNet’s Supplements describe a transaction whereby Energy Growth AS, the largest shareholder of RigNet’s parent company, will sell its RigNet, Inc. shares to Digital Oilfield Investments LP (“Digital”), an entity organized under the laws of the Cayman Islands and controlled by affiliates of KKR & Co. L.P. (“KKR”). RigNet herein confirms that Digital has completed its purchase of RigNet, Inc. shares and warrants from Energy Growth AS and has also exercised its warrants in RigNet, Inc. As a result, Digital currently holds a 28.2% direct interest in RigNet, Inc. and indirectly in RigNet. Energy Growth AS retains a less than a 1% direct interest in RigNet, Inc.

Limited Partners Are Insulated in Accordance with FCC Rules: RigNet clarifies the statements on pages 2 and 3 of the Supplement to the Petition for Declaratory Ruling about insulated limited partners in certain funds in the upstream ownership of Digital. The limited partners of KKR Partners II (International), L.P., KKR European Fund III, Limited Partnership (“KKR European Fund III”) and KKR are each insulated in accordance with the Commission’s rules, 47 C.F.R. § 1.993(a).

Ownership Percentage of Digital and Upstream Owners Updated: RigNet updates the percentages identified on pages 3-6 of the Supplement to the Petition for Declaratory Ruling and on pages 2-5 of the Supplement to the Joint Application for Section 214 to provide corrected equity and voting interests currently held by Digital and its upstream owners following the purchase of RigNet, Inc. stock and exercise of certain stock warrants by Digital. In addition, the indirect equity interest held by KKR European Fund III has been updated because KKR European Fund III acquired a 93.99% direct limited partnership interest in Digital (rather than 95%) and KKR Partners II (International), L.P. acquired a 6.01% direct limited partnership interest in Digital (rather than 5%), which was set forth on page 2 of the Petition for Declaratory Ruling. The addresses, citizenship, and principal places of business have not

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changed since the Supplements were filed. A chart of the updated percentages appears below. Other than the listed entities and individuals, no other individual or entity holds a 10% or greater interest in RigNet.

Name	Percentage of Equity/Voting Interests
Digital Oilfield Investments LP	28.2% equity / 28.2% voting
Digital Oilfield Investment GP Limited	less than 1% equity / 28.2% voting (General Partner of Digital Oilfield Investments LP)
KKR European Fund III, Limited Partnership	26.5% equity / 28.2% voting (owns 93.99% of Digital Oilfield Investments LP)
KKR Associates Europe III, Limited Partnership	less than 1% equity / 28.2% voting (General Partner of KKR European Fund III, Limited Partnership)
KKR Europe III Limited	less than 1% equity / 28.2% voting (General Partner of KKR Associates Europe III, Limited Partnership)
KKR Fund Holdings L.P.	less than 1% equity / 28.2% voting (Sole Member of KKR Europe III Limited)
KKR Fund Holdings GP Limited	less than 1% equity / 28.2% voting (General Partner of KKR Fund Holdings L.P.)
KKR Group Holdings L.P.	less than 1% equity / 28.2% voting (General Partner of KKR Fund Holdings L.P. and sole shareholder of KKR Fund Holdings GP Limited)
KKR Group Limited	less than 1% equity / 28.2% voting (General Partner of KKR Group Holdings L.P.)
KKR & Co. L.P.	less than 1% equity / 28.2% voting (Sole Member of KKR Group Limited)
KKR Management LLC	0% equity / 28.2% voting (General Partner of KKR & Co. L.P.)
Henry Kravis	less than 5% equity / 28.2% voting (Designated Member of KKR Management LLC)
George R. Roberts	less than 5% equity / 28.2% voting (Designated Member of KKR Management LLC)

Updated Ownership and Control Chart Showing Current Equity and Voting Interests of Digital and Its Upstream Ownership and Other Adjusted Aggregate Percentages of U.S. and Foreign Owners: RigNet provides an updated Exhibit A to the Supplements to depict the current ownership and control structure of RigNet as of its June 30, 2013 report to the Security and Exchange Commission and reflecting subsequent reported sales of shares and warrants. Exhibit A lists the current equity and voting interest percentages held by Digital and its upstream owners and the other aggregate percentages of U.S. and foreign equity and voting interests in RigNet.

RigNet provides an updated Exhibit B to the Supplement to the Petition for Declaratory Ruling to list the updated percentage estimates of RigNet, Inc.'s aggregate direct and indirect (1) foreign equity interests which total 45.89% and (2) foreign voting interests which total 44.89%.

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Clarification of Request to Permit Additional Indirect Equity and/or Voting Interests by Foreign Investors: RigNet corrects an inadvertent omission of the word “equity” from the request on page 6 of the Supplement to the Petition for Declaratory Ruling (and page 7 of the underlying Petition for Declaratory Ruling) to permit additional aggregate indirect equity and/or voting interest by foreign investors up to 100%. Further, RigNet updates its request on page 6 for specific approval for Digital and its upstream owners that are foreign entities to directly or indirectly hold the equity and voting interests in RigNet, Inc. as listed above and to allow these entities to increase equity and/or voting interests up to a non-controlling 49.99 percent interest in RigNet, Inc. and to allow for KKR, which will hold an indirect equity and voting interest as listed above, to have foreign equity and/or voting interests up to and including a non-controlling indirect 49.99 percent equity and/or voting interest in RigNet, Inc.

No KKR Affiliates Provide Domestic Telecommunications Services: Finally, in response to a question from staff, we confirm that KKR & Co. L.P. is not aware of any affiliate that provides domestic telecommunications services.

This letter is being filed via IBFS and ECFS in the above-referenced docket numbers. Please contact the undersigned if you have any questions concerning this filing.

Respectfully submitted,

/s/ Catherine Wang

Catherine Wang
Danielle Burt

Counsel for RigNet Satcom, Inc.

cc (via email): David Krech, IB
Susan O’Connell, IB
Jodie May, WCB
Bob Ward
Wayne Johnson
Christine Crowe

Exhibit A

Ownership and Control Structure Chart

EXHIBIT A

RigNet Ownership and Control Structure

Key

- Equity/voting
- █ Control Chain
- █ Licensee
- (D) Direct Ownership in RigNet Satcom, Inc.
- (I) Indirect Ownership in RigNet, Inc.

Henry R. Kravis &
George R. Roberts

Designated Members

Less than 5% equity (I),
28.2% voting (I)

KKR Management LLC
(Delaware)

General Partner
0% equity (I), 28.2% voting (I)

KKR & Co. L.P.
(Delaware)

Sole Member (shareholder)
Less than 1% equity (I), 28.2% voting (I)

KKR Group Limited
(Cayman Islands)

General Partner
Less than 1% equity (I), 28.2% voting (I)

KKR Group Holdings L.P.
(Cayman Islands)

General Partner
Less than 1% equity (I), 28.2% voting (I)

KKR Fund Holdings L.P.
(Cayman Islands)

Sole Member (shareholder)
Less than 1% equity (I), 28.2% voting (I)

KKR Europe III Limited
(Cayman Islands)

General Partner
Less than 1% equity (I), 28.2% voting (I)

KKR Associates Europe III, Limited Partnership
(Cayman Islands)

General Partner
Less than 1% equity (I), 28.2% voting (I)

KKR European Fund III, Limited Partnership¹
(Cayman Islands)

93.99%
26.5% equity (I), 28.2% voting (I)

Digital Oilfield Investments LP
(Cayman Islands)

28.2% (D)

RigNet, Inc.
(Delaware)

100%, Real Party-In-Interest

RigNet SatCom, Inc.
(Delaware)

KKR Fund Holdings GP Limited
(Cayman Islands)

General Partner
Less than 1% equity (I), 28.2% voting (I)

Digital Oilfield Investments GP Limited
(Cayman Islands)

General Partner

¹ A KKR Affiliate, KKR Partners II (International), L.P. organized in the Cayman Islands, owns the remaining 6.01% in Digital Oilfield Investments LP

Various foreign
interest holders
(None individually holds
10% or more)

16.69% voting (D)
17.69% equity (D)

Various U.S.
interest holders
(None individually holds
10% or more)

55.11% voting (D)
54.11% equity (D)

Exhibit B

Aggregate Foreign Investor Interests in RigNet, Inc.

Investor	Country of Citizenship/Organization	Aggregate % Voting	Aggregate % Equity
Digital Oilfield Investments LP	Cayman Islands	28.2%	28.2%
Aggregate Known	Norway, Brazil, Canada, Malaysia, Qatar, Singapore, Sweden, United Kingdom	1.19%	1.19%
Aggregate Unknown	Unknown	15.5%	16.5%
TOTAL		44.89%	45.89%