RESPONSE TO QUESTION 34: FOREIGN OWNERSHIP EXHIBIT

Glentel Corp. ("Glentel"), a U.S. corporation, is wholly-owned by Glentel U.S. Corp. ("Glentel US"), a U.S. corporation. Glentel US is, in turn, wholly-owned by Glentel Inc., a publicly-held Canadian corporation whose shares are traded on the Toronto Stock Exchange. The principal shareholder of Glentel Inc. is TCG International Inc., which is a closely-held Canadian company, all of whose shareholders are Canadian. Pursuant to the rules and policies established in the Commission's *Foreign Participation Order*, 12 FCC Rcd 23891 (1997), Order on Reconsideration, 15 FCC Rcd 18158 (2000), the "home market" of Glentel Inc. and TCG International Inc. is Canada, which is a member of the World Trade Organization.

In a grant (*see* Report No. TEL-00821; DA 04-2520, rel. Aug. 12, 2004) of a petition for declaratory filed by Glentel (FCC File No. ISP-PDR-20030502-00014), the Commission permitted the indirect foreign ownership of Glentel by Glentel Inc. and its Canadian shareholders, including TCG International Inc., in an amount up to and including 100%. The ruling also provided that Glentel could acquire up to and including an additional, aggregate 25% indirect equity and/or voting interest from other foreign individuals and entities without seeking further Commission approval under Section 310(b)(4), subject to conditions. Glentel's ownership remains within the foreign ownership levels authorized by the Commission in 2004.

RESPONSE TO QUESTION 36: DISMISSAL OF APPLICATION

Glentel Corp. ("Glentel") has not had any FCC station authorization or license revoked, nor has the Commission ever denied a Glentel application for an initial, modification, or renewal of FCC station authorization, license, or construction permit. The Commission did dismiss without prejudice a Glentel application for blanket authority to operate up to 50,000 mobile earth terminals on a common carrier basis. The dismissal was based on the direct ownership restrictions of Section 310(b)(3) the Communications Act of 1934, as amended.[1] After modifying its ownership structure, Glentel re-filed the application and it was granted.

Glentel is providing this information in response to Question 36 out of an abundance of caution.

[1] *In the Matter of Glentel Corp. For Blanket Authorization to operate up to 50,000 mobile satellite earth terminals (E990349) though Canadian-licensed satellite MSAT-1 at 106.5 degrees W.L. in frequency bands 1530-1559 MHz and 1631.5–1660.5 MHz throughout the Continental United States, United States Territories, Alaska, and Hawaii*, Memorandum Opinion and Order, DA 02-1509 (rel. Jun. 28, 2002).

RESPONSE TO QUESTION 42: NON-U.S. LICENSED SATELLITES

In this application, Glentel Corp. ("Glentel") seeks to modify its mobile earth terminal ("MET") license by adding SkyTerra 1, located at 101.3° W.L., as a point of communication, and by reflecting a change in the orbital location of MSAT-2, which already is an authorized point of communication, to 103.3° W.L. SkyTerra 1 and MSAT-2 are US-licensed satellites.

The Commission also already has authorized Glentel's METs to communicate with MSAT-1, which is a Canadian-licensed satellite. Glentel is not seeking any changes to this authority.