

Exhibit A

I. DESCRIPTION OF MODIFICATION

ISAT US, Inc. (“ISAT US”), a subsidiary of Inmarsat Global Ltd. (“Inmarsat”), seeks authority to modify its Global Xpress Ka-band aeronautical mobile blanket earth station license, Call Sign E140114, to add a new point of communication. Each of the currently authorized earth station terminal types would communicate with the Inmarsat-5 F3 satellite (“I5F3”) at the nominal 180° E.L. orbital location. The area of operations of the terminals will be modified to include the entire coverage area of I5F3, as illustrated below.

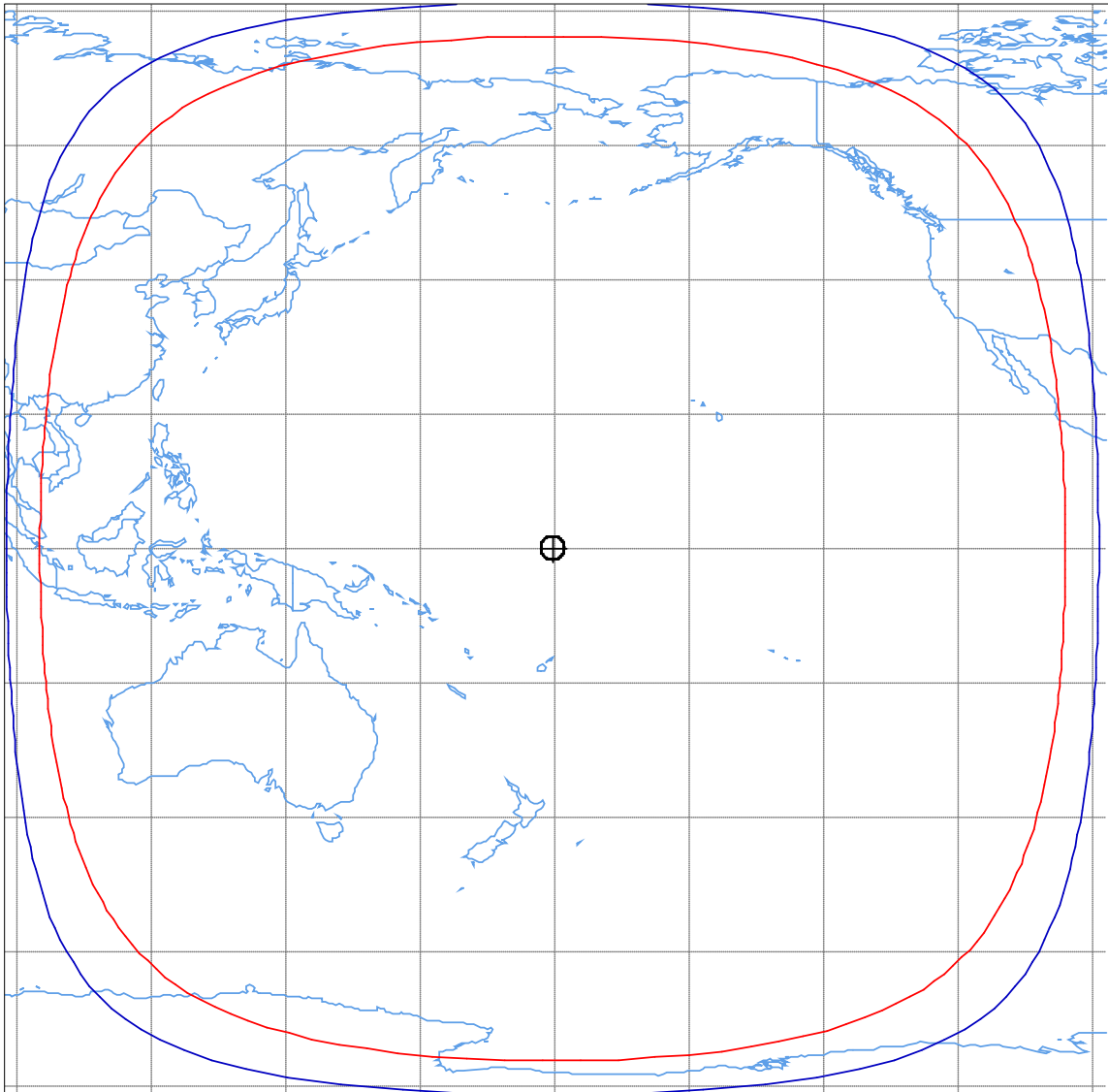


FIGURE 1

**Global Xpress I5 F3 Satellite Coverage
(5-degree contour in red; 0-degree contour in blue)**

The technical parameters of I5F3 are detailed in application for market access for the satellite filed with the Commission by ISAT US affiliate, Inmarsat Mobile Networks, Inc. *See* IBFS File Nos. SES-LIC-20150402-00188; SES-AMD-20150910-00577, Call Sign E150028. ISAT US incorporates by reference the relevant information regarding I5F3 in that application, as amended.

The requested modification would allow Inmarsat to expand its Ka-band aeronautical service to provide seamless coverage to aircraft traveling in the Pacific Ocean region, supporting the provision of high-data rate communications services, including broadband Internet access and related applications, on board aircraft. Grant of this application would facilitate the expansion of aeronautical communications through the Global Xpress network to meet the needs of the aviation industry, and ultimately consumers and government and enterprise users who increasingly demand ubiquitous, high-speed connectivity. Therefore, grant of this application is in the public interest.

To the extent necessary, ISAT US seeks a waiver of the U.S. Table of Frequency Allocations in Section 2.106 of the Commission's rules ("U.S. Table"), and the Commission's Ka-band band plan, to operate mobile terminals with an FSS satellite point of communication in frequencies allocated for FSS. Such a waiver has already been granted for the in license call sign E140114, and ISAT US does not believe a new waiver is needed for a new point of communication, but makes this request out of an abundance of caution.

ISAT US provides the information below regarding the ownership of ISAT US. No other modifications are sought by this application.

II. ISAT US OWNERSHIP

On April 1, 2015, ISAT US filed a petition for declaratory ruling ("PDR") and *pro forma* transfer of control application with the Commission. The Commission placed the PDR applications on public notice on April 27, 2015.¹ There were no comments filed and the Commission granted the applications on May 13, 2015.² The *pro forma* transaction was consummated on June 30, 2015.

In summary, ISAT US, a Delaware corporation, was previously a wholly-owned, direct subsidiary of U.S.-organized Inmarsat US Holdings, Inc. ("IUSHI"). IUSHI is a wholly-owned, direct subsidiary of U.K.-organized Inmarsat Services, Ltd., which is, in turn, a wholly-owned, direct subsidiary of U.K.-organized Inmarsat Ventures Ltd. Inmarsat Ventures Ltd. is ultimately wholly owned, through three U.K.-organized holding companies, by Inmarsat plc, a widely-held public company organized in the United Kingdom. The PDR stated that the Commission previously approved ISAT US's foreign ownership chain in 2010 under IBFS File No. ISP-PDR-20100107-00006.³

¹ *See* ISP-PDR-20150401-00001 (Report No. TEL-01729NS); SES-T/C-20150407-00204.

² *See* Public Notice, Report No. TEL-01733, DA No. 15-585 (rel. May 14, 2015).

³ *See* Public Notice, International Authorizations Granted, DA 10-1417, 25 FCC Rcd 10332, 10338 (Int'l Bur. 2010) ("2010 Public Notice").

The Commission approved the transfer of control of ISAT US into the previously-approved ownership chain of its affiliates, Inmarsat Solutions (US), Inc. (“ISUS”) and Inmarsat Mobile Networks, Inc. (“IMN”), and at the same level as ISUS and IMN. As a result, ISAT US now has a different direct, U.S. intermediary holding corporation parent, Inmarsat Group Holdings, Inc. (“IGHI”), and two additional U.K.-organized, intermediary parent companies for which ISAT US, which were approved as part of the recent PDR; specifically, Inmarsat Solutions Ltd. (f/k/a CIP UK Holdings Limited) and Inmarsat Finance III Limited, which directly and indirectly wholly own IGHI. The Commission previously approved the foreign ownership chain of ISUS (and IMN) in a declaratory ruling issued to ISUS (f/k/a Stratos Communications, Inc.) in 2010 under IBFS File No. ISP-PDR-20100628-00014.⁴

III. RESPONSE TO QUESTION 36

ISAT US, Inc. submits this response to Question 36 of the FCC Form 312 out of an abundance of caution. In 2005, the Commission dismissed a Petition for Declaratory Ruling (the “Petition”) filed by Inmarsat Mobile Networks, Inc.’s affiliate, Inmarsat Global Limited (“Inmarsat Global”), seeking United States market access to provide MSS in the 2 GHz band. Subsequent to Inmarsat Global’s filing, the Commission assigned all 2 GHz spectrum currently allocated for MSS in the United States to two other satellite operators, and thus dismissed Inmarsat Global’s Petition.⁵

⁴ See 2010 Public Notice, 25 FCC Rcd at 10334.

⁵ *Use of Returned Spectrum in the 2 GHz Mobile Satellite Service Frequency Bands*, 20 FCC Rcd 19696 (2005); *Inmarsat Global Limited, Petition for Declaratory Ruling to Provide Mobile Satellite Service to the United States Using the 2 GHz and Extended Ku-Bands*, 20 FCC Rcd 19409 (2005).