

## DESCRIPTION OF OWNERSHIP

### *Response to Question 34*

Stratos Offshore Services Company (“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>1</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 Investments Ltd, which is 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 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 Lansdowne 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>2</sup> and it has approved the current ownership structure.<sup>3</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:

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<sup>1</sup> Inmarsat Solutions Ltd was formerly known as CIP UK Holdings Limited.

<sup>2</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>3</sup> See SES-T/C-20100610-00687 (granted June 29, 2010).

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

# OWNERSHIP AND CONTROL OF STRATOS OFFSHORE SERVICES COMPANY

