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Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW, Room TW-B204
Washington, DC 20554

Re: Application of Row 44, Inc. (File No. SES-T/C-20121203-01063)

Dear Ms. Dortch:

Row 44, Inc. (“Row 44”), by counsel and pursuant to Section 1.65 of the Commission’s Rules (47 C.F.R. § 1.65), hereby provides, in response to an inquiry from FCC staff, additional information relevant to the above-referenced application, by which it seeks approval for transfer of control of its aeronautical mobile-satellite service earth station network from its existing shareholders to Global Eagle Acquisition Corp. (“Global Eagle”). In particular, Row 44 provides additional information concerning the ownership of PAR Investment Partners, L.P. (“PAR Investment”), which will hold approximately 40% of the equity in the Global Eagle following consummation of the transaction.

PAR Investment is a private investment company organized as a Delaware limited partnership and with its headquarters located at One International Place, Suite 2401, Boston, Massachusetts 02110-2633. It has held a substantial investment stake directly in Row 44 since Row 44 filed its initial application for an FCC license in May 2008.

The largest equity share in PAR Investment (43%) is held by its General Partner, PAR Group, L.P. (“PAR Group”), also a Delaware limited partnership headquartered at the same Boston address. No limited partner in PAR Investment will hold a stake large enough to constitute an attributable interest (>10%) in Row 44 post-consummation. No single investor in PAR Group will hold a stake large enough to constitute a post-consummation attributable interest in Row 44.



Investment and management decisions concerning PAR Group are made by PAR Capital Management, Inc. (“PAR Capital”), which exercises control over PAR Group pursuant to PAR Group’s limited partnership agreement. PAR Capital, in turn, is owned and operated by the four individuals identified in the chart below, each of whom holds an ownership stake in the company that is greater than ten percent (10%), and who together own all of PAR Capital’s equity. These individuals can be reached at the business address provided above for PAR Investment.

Name	Title	Ownership % *	Phone No.
Paul A. Reeder	Shareholder/President	25-50%	(617) 526-8990
Edward L. Shapiro	Shareholder/Vice President	25-50%	(617) 526-8990
Frederick S. Downs	Shareholder/Vice President	10-25%	(617) 526-8990
Arthur G. Epker	Shareholder/Vice President	10-25%	(617) 526-8990

Should there be any questions concerning this matter, please contact the undersigned counsel.

Respectfully submitted,

s/ David S. Keir

David S. Keir
Counsel for Row 44, Inc.

Attachment

cc: Karl A. Kensinger, FCC

* Ownership information is presented here in the same range format as in PAR Capital’s Form ADV, which is the uniform document used by investment advisers to register with both the Securities and Exchange Commission and state securities authorities.