

Exhibit 1

Supplemental Responses

Pursuant to Section 63.24 of the Commission's rules,¹ Viasat, Inc. ("Viasat" or "Transferee"), Connect Topco Limited ("Connect Topco" or "Transferor"), and Inmarsat Group Holdings Inc. ("IGHI" or "Licensee," and, together with Viasat and Connect Topco, "Applicants") request Commission consent to transfer indirect control of IGHI, which holds international Section 214 authorizations,² from Connect Topco to Viasat. That transfer of control, and the underlying transaction, are described more fully in the Narrative submitted with this Application.

Pursuant to Section 63.24(e)(2) of the Commission's rules,³ the Applicants submit the following information requested in Section 63.18(a)-(d) and (h)-(p)⁴ in support of this Application:

(a) Name, address, and telephone number of each Applicant:

Transferee:

Viasat, Inc.
6155 El Camino Real
Carlsbad, CA 92009
(844) 702-3199

FRN: 0004963088

Transferor:

Connect Topco Limited
Redwood House
St. Julian's Avenue
St. Peter Port, Guernsey GY1 1WA
+44 207728 1000

FRN: 0031808769

Licensee:

Inmarsat Group Holdings, Inc.
1441 L Street, NW
Suite 610
Washington, DC 20005
202-248-5150

FRN: 0019899194

¹ 47 C.F.R. § 63.24.

² See IBFS File Nos. ITC-214-19980121-00028, ITC-214-20090501-00194.

³ 47 C.F.R. § 63.24(e)(2).

⁴ *Id.* § 63.18(a)-(d), (h)-(p).

(b) Place of organization of each Applicant:

Transferee:

Viasat is a Delaware corporation.

Transferor:

Connect Topco Limited is a Guernsey limited company.

Licensee:

IGHI is a Delaware corporation.

(c) Correspondence concerning this Application should be sent to (Answer to Question 10):

For Viasat:

Matthew T. Murchison
Elizabeth R. Park
Latham & Watkins LLP
555 Eleventh Street, NW
Suite 1000
Washington, DC 20004
Tel: 202-637-2136
Fax: 202-632-2201
matthew.murchison@lw.com
elizabeth.park@lw.com

with a copy to:

John P. Janka
Jarrett S. Taubman
Viasat, Inc.
901 K Street, NW
Suite 400
Washington, DC 20001
Tel: 202-383-5050
john.janka@viasat.com
jarrett.taubman@viasat.com

For Connect Topco and IGH:

Alfred M. Mamlet
Steptoe & Johnson LLP
1330 Connecticut Avenue, NW
Washington, DC 20036

Tel: 202-429-6205
amamlet@steptoe.com

with a copy to:

Donna Bethea-Murphy
Inmarsat
1441 L Street, NW
Suite 610
Washington, DC 20005
Tel: 202-248-5150
donna.bethea-murphy@inmarsat.com

(d) Statement as to whether the Applicants have previously received authority under Section 214 (Answer to Question 10):

Transferee:

Viasat does not hold any international Section 214 authorization.

Transferor:

Connect Topco does not hold any international Section 214 authorization.

Licensee:

IGHI holds the following international Section 214 authorizations: IBFS File No. ITC-214-19980121-00028; IBFS File No. ITC-214-20090501-00194.⁵

(h) Post-Proposed Transaction ownership of the Transferee (Answer to Questions 11-12):

The following entities will own or control, directly or indirectly, a ten percent or greater equity or voting interest in Viasat upon consummation of the Proposed Transaction:

Name:	The Baupost Group, L.L.C. (“Baupost”)
Address:	10 Saint James Avenue, Suite 1700, Boston, MA 02116
Citizenship:	U.S. (Massachusetts)
Principal Business:	Investment Advisor
Percentage Expected:	13.87% Equity / 13.87% Voting

⁵ Prior to the 2019 take-private transaction described in Section I.A.2 of the Narrative submitted with this Application, IGHl and several of its affiliates surrendered a number of international Section 214 authorizations that were determined to be duplicative following consultations with Commission staff. *See International Authorizations Granted*, Public Notice, 34 FCC Rcd 2852 (2019).

Name: Baupost Group GP, L.L.C. (“Baupost GP”)
Address: 10 Saint James Avenue, Suite 1700, Boston, MA 02116
Citizenship: U.S. (Delaware)
Principal Business: Investment Company General Partner
Percentage Expected: 13.87% Equity / 13.87% Voting (as manager of Baupost)

Name: Seth A. Klarman
Address: 10 Saint James Avenue, Suite 1700, Boston, MA 02116
Citizenship: U.S.
Principal Business: Investment Fund Manager
Percentage Expected: 13.87% Equity / 13.87% Voting (as sole managing member of Baupost GP)⁶

There are no additional individuals or entities that will own or control, directly or indirectly, a 10 percent or greater equity or voting in Viasat upon consummation of the Proposed Transaction.⁷

To the extent any of Viasat’s affiliates are deemed to be a foreign carrier (see response to Question 14, below), certain Viasat officers may serve as directors of such entities. In addition, Keven Lippert, who serves as an officer of Viasat, also serves as an independent director of Virgin Mobile Latin America, which provides wireless telecommunications services in Mexico, Colombia, and Chile.

(i) Description of the transaction and public interest statement (Answer to Question 13):

See Exhibit 2 submitted with this Application.

(j) Foreign carrier status of the Transferee and its affiliates (Answer to Question 14):

Viasat and its affiliates hold service provider authorizations in 39 foreign countries. In general, Viasat provides the same types of broadband Internet access and voice-over-Internet

⁶ As of November 19, 2021, Baupost, as well as Baupost GP as manager of Baupost and Seth A. Klarman as sole managing member of Baupost GP, held approximately 22.19 percent of Viasat’s outstanding common stock. Their interest will be diluted upon the closing of the Proposed Transaction and the issuance of stock to the current shareholders of Connect Topco.

⁷ Upon the closing of the Proposed Transaction, each of the current shareholders of Connect Topco will hold less than 10 percent of the equity and voting interests in Viasat. Additionally, the current shareholders of Connect Topco have a contractual right to designate for nomination up to two out of ten directors to Viasat’s board of directors; their right to designate directors for nomination is subject to their ownership percentage of the total outstanding shares of Viasat’s common stock. Those parties also are contractually obligated to vote their shares in accordance with the recommendation of the Viasat board of directors or any applicable committee thereof with respect to any action, proposal or matter to be voted on by the Viasat stockholders for a specified period.

Protocol services in those countries that it provides in the United States, and accordingly believes that these services are not international telecommunications services provided by a foreign carrier, as defined in Section 63.09(d) of the Commission's rules.⁸ To the extent any such services provided could be deemed to be international telecommunications services provided by a foreign carrier, neither Viasat nor any of its affiliates has market power over any international transport or local access facilities, or services on the foreign end of any international route, and such services are offered in competition with dominant foreign carriers and other services.

Upon consummation of the Proposed Transaction, Viasat will own and control 100 percent of Connect Topco, an indirect parent of IGHI. The following table lists all non-U.S. subsidiaries of Connect Topco that are foreign carriers, their affiliation with Connect Topco, and the area(s) that they serve (none of the listed entities is a direct or indirect subsidiary of IGHI):

Foreign Carrier	Affiliation	Area(s) Served
Inmarsat Global Limited	100 percent indirectly owned by Connect Topco	Operates globally and holds authorizations or is notified in Austria, Belgium, France, Germany, Hungary, Italy, Lithuania, Monaco, Netherlands, Portugal, Romania, Spain, Switzerland, United Kingdom, Australia, Egypt, Iraq, Saudi Arabia, Brazil, Colombia, Ecuador, Nicaragua, Paraguay, Peru, Uruguay, Kenya
Inmarsat Ventures SE	100 percent indirectly owned by Connect Topco	All European Union countries, as well as United Kingdom, Norway, Switzerland
Inmarsat Solutions BV	100 percent indirectly owned by Connect Topco	Australia, Netherlands
Inmarsat SA	100 percent indirectly owned by Connect Topco	Switzerland, Ethiopia, Iran, Iraq, Jordan, Kuwait, Lebanon, Libya, Morocco, Oman, Djibouti, Mauritania, Qatar, Tunisia

⁸ See 47 C.F.R. § 63.09(d).

Inmarsat Solutions (Canada) Inc.	100 percent indirectly owned by Connect Topco	Canada
Inmarsat Solutions AS	100 percent indirectly owned by Connect Topco	Norway
Inmarsat Navigation Ventures Limited	100 percent indirectly owned by Connect Topco	United Kingdom
Inmarsat Australia Pty Ltd	100 percent indirectly owned by Connect Topco	Australia
Inmarsat Leasing Ltd (Two)	100 percent indirectly owned by Connect Topco	Australia
Inmarsat Hong Kong Limited	100 percent indirectly owned by Connect Topco	Hong Kong
Inmarsat KK	100 percent indirectly owned by Connect Topco	Japan
Inmarsat New Zealand Limited	100 percent indirectly owned by Connect Topco	New Zealand
Inmarsat Solutions Pte Ltd	100 percent indirectly owned by Connect Topco	Singapore
Flysurfer Colombia SAS	100 percent indirectly owned by Connect Topco	Colombia
ISAT Global Xpress OOO	99.9 percent indirectly owned by Connect Topco	Russian Federation
Inmarsat Communications Company LLC	49 percent indirectly owned by Connect Topco	United Arab Emirates

(k) Operation to foreign destinations (Answer to Question 15):

Viasat, as Transferee, certifies that (i) it is not a foreign carrier except to the extent identified in response to Question 14, above; (ii) it does not control a foreign carrier providing international telecommunications services in any destination country except to the extent identified in response to Question 14, above; (iii) no entity that owns 25 percent of Viasat or

controls Viasat, also controls a foreign carrier providing international telecommunications services except to the extent identified in response to Question 14, above, and (iv) through its acquisition of control of the Licensee, Viasat does not seek to provide international telecommunications services to any designation country where two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of Viasat and are parties to, or the beneficiaries of, a contractual relation affecting the provision or marketing of international basic telecommunications services in the United States.

Therefore, if the Application is granted and the Proposed Transaction is consummated, the Licensee would be affiliated with the foreign carriers identified in response to Question 14, above, which operate in the jurisdictions identified above.

(l) Statement as to the Licensee's market power (Answer to Question 18):

Each of the countries listed in Section IV(j), above, is a Member of the World Trade Organization ("WTO"), except for Ethiopia, Iran, Iraq, Lebanon, Libya, and Monaco. In addition, the entities identified above are not included on the Commission's "List of Foreign Telecommunications Carriers that are Presumed to Possess Market Power in Foreign Telecommunications Markets."⁹ Finally, each of the entities listed in the response to Question 14 lacks 50 percent market share in international transport facilities or services on the foreign end of a particular route, and any such services offered are in competition with dominant foreign carriers and other service providers.

(m) Request for non-dominant status (Answer to Question 16):

Pursuant to Section 63.10(a)(3) of the Commission's rules, the Applicants request non-dominant status for the Licensee on all routes between the United States and the countries identified in response to Question 14. The Inmarsat subsidiaries that are foreign carriers, and Viasat affiliates to the extent any may be deemed foreign carriers, are not dominant providers in their respective countries of operation, and each lacks a 50 percent market share in the international transport and local access markets on the foreign end of the particular route. Accordingly, these entities lack sufficient market power on the foreign end of the international route to affect competition adversely in the U.S. market.

(n) Statement regarding special concessions (Answer to Question 21):

The Applicants certify that they have not agreed to accept special concessions, directly or indirectly, from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into any such agreements in the future.

⁹ *The International Bureau Revises and Reissues the Commission's List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets*, Public Notice, 22 FCC Rcd 945 (2007).

(o) Anti-Drug Abuse Act certification (Answer to Question 25):

The Applicants certify that no party to this Application is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance.

(p) Eligibility for streamlined processing:

The Applicants are not requesting streamlined processing of this Application.