

ANPI, LLC  
Attachment 1

Further Information Provided in Response  
to Questions 12a, 12b, 12c, 16, 17, 18, 19, 20 and 21  
of Foreign Carrier Affiliation Notification  
filed May 13, 2011

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Question 12a

Although the Commission has not expressly determined in an adjudication that the affiliated foreign carriers specified in response to Question 12b below lack market power in the respective destination markets of Hong Kong and Singapore, the International Bureau has determined that other foreign carriers unaffiliated with ANPI, LLC are presumed dominant in these markets. Specifically, the International Bureau has established a presumption that Pacific Century CyberWorks HKT is dominant in the Hong Kong market, and that Singapore Telecom is dominant in the Singapore market. *See 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, DA07-233, January 26, 2007.

Question 12b

The affiliated foreign carriers that own facilities and their markets are:

ZONE Limited (Hong Kong)  
ZONE Telecom Pte Ltd. (Singapore)

Question 12c

ZONE Limited is authorized to operate in Hong Kong, which is a WTO Member. ZONE Telecom Pte Ltd. is authorized to operate in Singapore, which is a WTO Member.

ANPI, LLC demonstrates herein that it is entitled to non-dominant classification on the newly affiliated routes pursuant to Section 63.10(a)(4) of the Commission's rules. Section 63.10(a), 47 C.F.R. §63.10(a)(4) states:

A carrier that is authorized under this part to provide to a particular destination an international switched service, and that provides such service solely through the resale of unaffiliated U.S. facilities-based carriers' international switched services (either directly or indirectly through the resale of another U.S. resale carrier's international switched services), shall presumptively be classified as non-dominant for the provision of the authorized services.

As stated in the ANPI and Zone Telecom Joint International and Domestic Application for Consent to Transfer Control of 214 Authorized Carrier, filed October 14, 2010 and granted by the Commission on March 4, 2011 (ITC-ASG-20101014-00411 E) ("Joint Application"), ANPI, LLC provides "international service to Hong Kong and Singapore solely through the resale of unaffiliated U.S. facilities-based carriers' international switched services ...." (Joint Application, Attachment 1, Answer to Question 16). Accordingly, pursuant to Section 63.10(a)(4) of the Commission's rules, ANPI, LLC is presumptively non-dominant on those routes.

#### Question 16

ANPI, LLC requests continued regulation as a non-dominant international carrier. ANPI, LLC qualifies for such regulation pursuant to Section 63.10(a)(4) of the Commission's rules. See Response to Question 12c above.

#### Question 17

The foreign carriers newly affiliated with ANPI, LLC are ZONE Limited and ZONE Telecom Pte Ltd. ZONE Limited holds a Public Non-Exclusive Telecommunications Service License to provide service in Hong Kong. ZONE Telecom Pte Ltd. holds a "Service-Based" (as opposed to "Facilities-Based") License to provide service in Singapore. See also Response to Question 12b above.

#### Question 18

ANPI, LLC holds authority under Section 214 of the Communications Act and FCC File No. ITC-96-123 to provide international switched services on a resale basis to its customers. Such authorization permits ANPI, LLC to provide international switched services on a resale basis to Hong Kong and Singapore.

#### Question 19

ANPI, LLC serves all foreign countries solely through resale of international switched services of unaffiliated U.S. facilities-based carriers. See also Responses to Questions 12c and 16 above.

#### Question 20

Pursuant to authorizations granted by the Commission on March 4, 2011 (see Response to Question 12c above), and the changes in ownership completed on April 15, 2011, ANPI, LLC is owned directly by ANZ Communications, LLC, which is 50% owned by ANPI Holding, Inc. No single shareholder of ANPI Holding, Inc. currently holds an ownership interest of 10% or more in that company. Zone USA, Inc. owns the remaining 50% of ANZ Communications, LLC.

Zone USA, Inc. is 100% owned by Zone Global Limited, which is in turn 100% owned by Cyberman Limited, which is in turn 100% owned by e-Kong Pillars Holdings Limited, which is in turn owned 100% by e-Kong Group Limited. No single individual or entity owns 20% or more of e-Kong Group Limited. Therefore, no single individual or entity indirectly owns 10% or more of ANZ Communications, LLC through direct ownership of e-Kong Limited. However, one individual holds an attributable (direct and/or indirect) interest of 22.8% in e-Kong Group

Limited,<sup>1</sup> 50% of which (rounded to the nearest 1%) amounts to an 11% attributable indirect interest in ANZ Communications, LLC under FCC rules. That 11% interest belongs to Richard John Siemens of 3705 Gloucester Tower, The Landmark, 11 Pedder Street, Central, Hong Kong. Mr. Siemens is a citizen of Canada. His principal business is Director, e-Kong Group Limited. See Joint Application, Attachment 1, Answer to Question 11.

#### Question 21

No officer or director of ANPI, LLC is an officer or director of either ZONE Limited (Hong Kong) or ZONE Telecom Pte Ltd. (Singapore), which are the affiliated foreign carriers named in this notification.

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<sup>1</sup> Pursuant to the explanatory note to Section 63.18(h) of the Commission's rules, the 22.8% ownership interest of Richard John Siemens in e-Kong Group Limited is attributed through his controlling interest in Goldstone Trading Limited which directly owns 19.1% of e-Kong Group Limited, and his controlling interest in Siemens Enterprises Limited, which holds a 3.7% direct ownership interest in e-Kong Group Limited. See Joint Application, Attachment 1, Answer to Question 11.