LAWLER, METZGER, KEENEY & LOGAN, LLC

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May 17, 2018

Via Electronic Filing

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

> Re: Sprint Corporation – Supplement to Foreign Carrier Notifications: IBFS File Nos. FCN-NEW-20180216-00005 and FCN-NEW-20180427-00016

Dear Ms. Dortch:

Sprint Corporation ("Sprint") wholly owns, directly or indirectly, its subsidiaries Sprint Communications Company L.P.; Sprint Communications, Inc.; Sprint Spectrum L.P.; SprintCom, Inc.; US Telecom, Inc.; and Virgin Mobile USA, L.P., the filers of the above-referenced foreign carrier notifications ("FCNs").

Please be advised that Sprint recently acquired a majority interest in PRWireless PR, LLC, which holds an international section 214 authorization. By this letter, Sprint supplements its responses to Questions 4 and 18 of the above-referenced FCNs¹ to add PRWireless PR, LLC, to the list of Sprint companies holding an international 214 authorization:

- 4. The jurisdiction of formation for PRWireless PR, LLC, is Delaware.
- 18. PRWireless PR, LLC holds authority to operate as a facilities-based carrier in accordance with the provisions of 47 C.F.R. §§ 63.18(e)(1) & (2), pursuant to ITC-214-19990615-00426.

¹ IBFS File Nos. FCN-NEW-20180216-00005 and FCN-NEW-20180427-00016 have not yet appeared on Public Notice.

Additionally, Sprint supplements its responses to Question 20 of the above-referenced FCNs to provide the following ownership information for PRWireless PR, LLC.

Please note that this filing also supplements FCN-NEW-20180216-00005 in particular to update the ownership information for Sprint Corporation following a *pro forma* internal restructuring effected on April 26, 2018.² Specifically, as indicated below, SoftBank Group International GK was replaced by SoftBank Group Capital Limited as an intermediate holding company positioned between SoftBank Group Corp. and Sprint Corporation.

Ten Percent or Greater Ownership Information for PRWireless PR, LLC

PRWireless PR, LLC, is wholly owned by PRWireless HoldCo, LLC:

Name:	PRWireless HoldCo, LLC
Address:	PMB 856, PO Box 7891, Guaynabo, PR 00970-7891
Percentage Ownership:	100% of PRWireless PR, LLC
Citizenship:	Delaware
Principal Business:	Holding Company

The controlling interest in PRWireless HoldCo, LLC, is held by Sprint Puerto Rico Holdings, LLC, and an additional interest in PRWireless HoldCo, LLC, is held by Nextel of Puerto Rico, Inc., both of which are wholly owned subsidiaries indirectly held by Sprint Corporation through intervening subsidiaries. As shown below, Sprint Corporation indirectly holds a total of 72% of the equitable ownership of PRWireless HoldCo, LLC, and thus PRWireless PR, LLC.

Name:	Sprint Puerto Rico Holdings, LLC
Address:	12502 Sunrise Valley Drive, Reston, VA 20196
Percentage Ownership:	61.5% of PRWireless HoldCo, LLC and PRWireless PR, LLC
Citizenship:	Delaware
Principal Business:	Holding Company
Name:	Nextel of Puerto Rico, Inc.
Address:	12502 Sunrise Valley Drive, Reston, VA 20196
Percentage Ownership:	10.5% of PRWireless HoldCo, LLC and PRWireless PR, LLC
Citizenship:	Delaware
Principal Business:	Communications

Sprint Puerto Rico Holdings, LLC is a subsidiary of SprintCom, Inc.

See, e.g., ULS File No. 0008092759 at Exhibit 1 – Public Interest Statement (filed Feb. 12, 2018; consented to March 26, 2018; consummated April 26, 2018). IBFS File No. FCN-NEW-20180427-00016 reported the updated Sprint ownership chain in the original filing.

Name:	SprintCom, Inc.
Address:	12502 Sunrise Valley Drive, Reston, VA 20196
Percentage Ownership:	98.9% of Sprint Puerto Rico Holdings, LLC; 60.82% of
	PRWireless HoldCo, LLC and PRWireless PR, LLC
Citizenship:	Delaware
Principal Business:	Communications

SprintCom, Inc. is a wholly owned subsidiary of Sprint Communications, Inc. Sprint Communications, Inc. also wholly owns Nextel of Puerto Rico, Inc.

Name:	Sprint Communications, Inc.
Address:	12502 Sunrise Valley Drive, Reston, VA 20196
Percentage Ownership:	100% of SprintCom, Inc.; 100% of Sprint Puerto Rico Holdings,
	LLC; ³ 100% of Nextel of Puerto Rico, Inc.; 72% of PRWireless
	HoldCo, LLC and PRWireless PR, LLC
Citizenship:	Delaware
Principal Business:	Communications

Sprint Communications, Inc. is wholly owned by Sprint Corporation. Sprint is therefore the beneficial owner of 72% of PRWireless PR, LLC.

Name:	Sprint Corporation
Address:	6200 Sprint Parkway, Overland Park, Kansas 66251
Percentage Ownership:	100% of Sprint Communications, Inc., SprintCom, Inc., Sprint
	Puerto Rico Holdings, LLC, and Nextel of Puerto Rico, Inc., and
	72% of PRWireless HoldCo, LLC and PRWireless PR, LLC
Citizenship:	USA
Principal Business:	Holding Company

Sprint Corporation is a subsidiary of Starburst I, Inc.

Name:	Starburst I, Inc.
Address:	One Circle Star Way, San Carlos, CA 94070
Percentage Ownership:	Approximately 77% of Sprint Corporation
Citizenship:	USA
Principal Business:	Holding Company

Starburst I, Inc. is a wholly owned subsidiary of Softbank Group Capital Limited.

³ In addition to the 98.9% of Sprint Puerto Rico Holdings, LLC it holds through SprintCom, Inc., Sprint Communications, Inc. also indirectly holds 1.1% of Sprint Puerto Rico Holdings, LLC through its wholly owned subsidiary Utelcom, Inc., which wholly owns Sprint International Incorporated, which directly holds 1.1% of Sprint Puerto Rico Holdings, LLC.

Name:	Softbank Group Capital Limited
Address:	5th Floor, 6 Andrews Street, London, EC4A 3AE, United
	Kingdom
Percentage Ownership:	100% of Starburst I, Inc. and Galaxy Investment Holdings, Inc. ⁴
Citizenship:	United Kingdom
Principal Business:	Holding Company

Softbank Group Capital Limited is a wholly owned subsidiary of SoftBank Group Corp.

Name:	SoftBank Group Corp.
Address:	1-9-1 Higashi-shimbashi, Minato-ku, Tokyo 105-7303, Japan
Percentage Ownership:	100% of Softbank Group Capital Limited
Citizenship:	Japan
Principal Business:	Holding Company

The following individual is the only owner of 10% or more of the equity of SoftBank Group Corp.

Name:	Masayoshi Son
Address:	c/o SoftBank Group Corp., 1-9-1 Higashi-shimbashi, Minato-ku,
	Tokyo 105-7303, Japan
Percentage Ownership:	Approximately 21% of SoftBank Group Corp.
Citizenship:	Japan
Principal Business:	Chairman and CEO of SoftBank Group Corp.

The remaining 28% of the equity of PRWireless PR, LLC, is held as follows:

Name:	PRWireless PR, Inc.
Address:	PMB 865 PO Box 7891, Guaynabo, PR 00970
Percentage Ownership:	28% of PRWireless HoldCo, LLC and PRWireless PR, LLC
Citizenship:	Delaware
Principal Business:	Investor

PRWireless PR, Inc. is a wholly owned subsidiary of PRWireless, LLC.

⁴ Galaxy Investment Holdings, Inc., a U.S. company, owns approximately 7% of Sprint Corporation and is a wholly owned subsidiary of SoftBank Group Capital Limited, which in turn is a wholly owned subsidiary of Softbank Group Corp. Accordingly, taking the ownership interests of both Starburst I, Inc. (approximately 77%) and Galaxy Investment Holdings, Inc. (approximately 7%) into account, Softbank Group Capital Limited and SoftBank Group Corp. beneficially own approximately 84% of Sprint Corporation.

Name:	PRWireless, LLC
Address:	PMB 865 PO Box 7891, Guaynabo, PR 00970
Percentage Ownership:	100% of PRWireless PR, Inc., and 28% of PRWireless PR, LLC
Citizenship:	Delaware
Principal Business:	Investor

PRWireless, LLC's largest owner is Columbia Capital Equity Partners IV (QP), LP, which holds 37.33% of PRWireless, LLC, and therefore a 10.45% indirect interest in PRWireless PR, LLC.

Name:	Columbia Capital Equity Parners IV, LLC
Address:	204 South Union Street, Alexandria, VA 22314
Percentage Ownership:	37.33% of PRWireless, LLC; 10.45% of PRWireless PR, LLC
Citizenship:	Delaware
Principal Business:	Investor

Finally, Sprint supplements its responses to Question 21 of the above-referenced FCNs to advise that Stefan K. Schnopp, Vice President and Secretary of PRWireless PR, LLC, is also an officer or director of the following foreign carriers:

- Director, Sprint International Australia Pty Ltd (in Australia)
- Director, Sprint International Austria GmbH (in Austria)
- Manager, SprintLink Belgium BVBA (in Belgium)
- Director, President and Secretary, Sprint International Communications Canada ULC (in Canada)
- Representative, Sprint International Chile Ltda (in Chile)
- General Manager, Sprint International Colombia Ltda. (in Colombia)
- Managing Director, Sprint International Czech Republic S.R.O. (in the Czech Republic)
- Director, SprintLink Denmark ApS (in Denmark)
- President, Sprintlink France SAS (in France)
- Director, SprintLink Germany GmbH (in Germany)
- Director, Sprint Hong Kong Ltd (in Hong Kong)
- Managing Director, Sprint International Hungary (in Hungary)
- Director and Secretary, SprintLink Ireland Ltd (in Ireland)
- Sole Director, SprintLink Italy S.r.l. (in Italy)
- Director and Representative Director, Sprint International Japan Corporation (in Japan)
- Director, Sprint International Korea (in Korea)
- Director, Sprintlink International Malaysia SDN. BHD. (in Malaysia)
- Sole Manager, SIHI Mexico S. de R.L. de C.V. (in Mexico)
- Director, SprintLink Netherlands B.V. (in the Netherlands)
- Director, Sprint International New Zealand (in New Zealand)
- Chairman, Sprint International Norway AS (in Norway)
- Management Board Member, Sprintlink Poland sp. z o.o. (in Poland)
- Director, Sprint International Communications Singapore Pte Ltd (in Singapore)

- Sole Director, Sprint International Spain, S.L. (in Spain)
- Chairman of the Board, SIHI Scandinavia AB (in Sweden)
- Manager-President, SprintLink International (Switzerland) GmbH (in Switzerland)
- Director, Sprint International Taiwan Ltd. (in Taiwan)
- Director, Sprint (Thailand) Limited (in Thailand)
- Director, SprintLink UK Ltd (in the United Kingdom)
- Director, Sprint International Venezuela, S.R.L. (in Venezuela)

If you have any questions with respect to this supplement, please do not hesitate to contact the undersigned.

Sincerely,

<u>/s/ Emily J. H. Daniels</u> Emily J. H. Daniels Counsel to Sprint Corporation