

Grasshopper Group LLC – Foreign Carrier Affiliation Notification

ATTACHMENT 1

Question 12(c)

By this filing, Grasshopper Group LLC (“Grasshopper”) notifies the Commission of its affiliations with the following foreign carriers: (i) Jive Telecomunicações do Brasil Ltda. (“Jive Brazil”), a reseller of telecommunications in Brazil; (ii) Jive Communications Technology Canada, Ltd. (“Jive Canada”), a reseller of telecommunications in Canada, and (iii) Jive Communications Mexico S.a. de R.L. de C.V. (“Jive Mexico,” together with Jive Brazil and Jive Canada, the “Foreign Carriers”), a reseller of telecommunications in Mexico.

These affiliations qualify for post notification because each of the Foreign Carriers is non-dominant on the routes between the U.S. and each of the respective destination markets. Each of the Foreign Carriers provides only resale service in their respective markets. In addition, Brazil, Canada and Mexico are each WTO member nations, and Grasshopper is entitled to retain its non-dominant classification on each route pursuant to the requirements of Section 63.10(a)(3) of the Commission’s rules. None of the Foreign Carriers is included in the Commission’s list of foreign carriers that are presumed to possess “market power” in its markets, and thus, each is entitled to the presumption of non-dominance.¹ Moreover, the Foreign Carriers hold significantly less than a 50 percent market share in the international transport and local access markets on the foreign end of the relevant routes.

Question 16

Grasshopper requests continued regulation as a non-dominant international carrier pursuant to Section 63.10 of the Commission’s rules. In response to Question 12(c) above, the Foreign Carriers do not possess market power in their respective markets. In addition, the Foreign Carriers are resellers of telecommunications services and lack sufficient market power to affect competition adversely in the U.S. and do not control bottleneck facilities in their respective markets.² Therefore, Grasshopper is entitled to non-dominant classification on the affiliated routes.

Question 17

On April 3, 2018, LogMeIn, Inc., the ultimate parent company of Grasshopper, acquired Jive Communications, Inc., which wholly owns each of the Foreign Carriers. Therefore, as of that date, Grasshopper became affiliated with the following foreign carriers: (i) Jive Telecomunicações do Brasil Ltda., a reseller of telecommunications in Brazil; (ii) Jive

¹ See *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, DA 07-233 (rel. Jan. 26, 2007).

² See *1998 Biennial Regulatory Review – Review of International Common Carrier Regulations*, Report and Order, 14 FCC Rcd 4909 ¶ 29 (1999).

Communications Technology Canada, Ltd. a reseller of telecommunications in Canada, and (iii) Jive Communications Mexico S.a. de R.L. de C.V., a reseller of telecommunications in Mexico.

Question 18

Grasshopper holds international Section 214 authority granted in File No. ITC-214-20090916-00417 to provide resale service in accordance with Section 63.18(e)(2) of the Commission's rules.

Question 19

To the extent Grasshopper serves the U.S. routes to Brazil, Canada or Mexico, such service is solely through the resale of international switched services of unaffiliated U.S. facilities-based carriers.

Question 20

The name, address, citizenship, and principal business of any person or entity that directly and indirectly owns at least ten percent of the equity in Grasshopper, and the percentage of equity owned by each of those entities (to the nearest one percent), are:

Name:	LogMeIn USA, Inc.
Address:	320 Summer Street Boston, MA 02210
Citizenship:	Delaware
Principal Business:	Software-as-a-Solution ("SaaS") Offerings
Percentage:	100% direct interest in Grasshopper

Name:	LogMeIn, Inc.
Address:	320 Summer Street Boston, MA 02210
Citizenship:	Delaware
Principal Business:	SaaS Offerings
Percentage:	100% direct interest in LogMeIn USA, Inc.

Name:	FMR LLC
Address:	245 Summer Street Boston, MA 02210
Citizenship:	Delaware
Principal Business:	Investment Management
Percentage:	10.32% direct interest in LogMeIn, Inc.

Based on a review of information regarding FMR LLC filed with the U.S. Securities and Exchange Commission and other publicly available sources, FMR LLC is a privately held entity owned and controlled by Abigail P. Johnson and the Johnson family. Ms. Johnson, a U.S. citizen, is the CEO, Chairman and Director of FMR LLC.

Question 21

There are no interlocking directorates between Grasshopper and any of the Foreign Carriers.