

ATTACHMENT TO FOREIGN CARRIER AFFILIATION NOTIFICATION

Background

On June 29, 2020, an affiliate of iBasis, Inc. (“iBasis”), iBASIS Portugal (formerly known as MEO ICS and Mercury Portugal), completed the acquisition of NOS International Carrier Services S.A. (“NICS”), a foreign carrier in Portugal pursuant to its registration with ANACOM – Autoridade Nacional de Comunicações. As a result, NICS became affiliated with iBasis through common ownership by Tofane Global SAS.

Response to Questions 12, 16 and 17

iBasis provides notification of a new affiliation with the following foreign carrier:

Country	Affiliate Name	Description of the Company
Portugal (WTO Member)	NOS International Carrier Services S.A. ¹ A Portuguese entity.	NICS holds a Registration to offer electronic communications services in Portugal pursuant to which it resells telecommunications services.

iBasis requests continued classification as a nondominant carrier under Section 63.10 of the Commission’s Rules on the United States and Portugal route. NICS lack 50 percent market share in the international transport and local access markets on the foreign end of the U.S.-Portugal route and thus lacks sufficient market power on the foreign end to adversely affect competition in the U.S. market. Accordingly, pursuant to Section 63.10(a)(3), iBasis remains presumptively classified as non-dominant on this route.

In IB File No. ITC-T/C-20180504-00082, iBasis previously identified its affiliation with other foreign carriers and, to the extent necessary, incorporates that information herein by reference.

Response to Question 18

iBasis holds international Section 214 authority to provide global resale services (File No. ITC-214-19971126-00741)

Response to Question 19

To the extent that iBasis provides international switched services between the United States and Portugal on a resale basis, iBasis provides such services only through the resale of international switched services of unaffiliated U.S. facilities-based carriers.

¹ It is expected that NICS will change its name to iBASIS NICS

Response to Question 20

The following entities hold, directly or indirectly, a ten percent (10%) or greater interest² in iBasis as calculated pursuant to the Commission's ownership attribution rules for international telecommunications carriers. Specifically, the following entity directly wholly owns iBasis:

Name: Tofane Global US LLC
Address: 87 Boulevard du Montparnasse
75006 Paris, France
Citizenship: Delaware
Principal Business: Telecommunications Holding Company
% Interest: 100% (directly in iBasis)

The following entity wholly owns Tofane Global US LLC:

Name: Tofane Global SAS
Address: 87 Boulevard du Montparnasse
75006 Paris, France
Citizenship: France
Principal Business: Telecommunications Holding Company
% Interest: 100% (100% indirectly in iBasis)

The following entities have a shareholding greater than 10 percent of the direct voting and/or equity interest in Tofane Global SAS:

Name: Tofane SAS
Address: 87 Boulevard du Montparnasse
75006 Paris, France
Citizenship: France
Principal Business: Telecommunications Holding Company
% Interest: 15.3% (15.3% indirectly in iBasis)

Name: Ciclad 6 Professional Private Equity Investment Fund
("Ciclad 6")
Address: 22 Avenue Franklin Delano Roosevelt
75008 Paris, France
Citizenship: France
Principal Business: Private Equity Fund
% Interest: 29.8% (29.8% indirectly in iBasis)

² Unless otherwise indicated, the ownership interests provided herein represent both equity and voting interests.

Name: SCOR Capital Partners
Address: 5 Avenue Kleber
75016 Paris, France
Citizenship: France
Principal Business: Holding Company
% Interest: 12.4% (12.4% indirectly in iBasis)

Name: Trocadero Croissance & Transmission II FPCI
Address: 44 Rue Paul Valéry
75116 Paris, France
Citizenship: France
Principal Business: Private Equity Fund
% Interest: 22% (22% indirectly in iBasis)

Name: Swen Capital Partners SA
Address: 22 Rue Vernier
75017 Paris, France
Citizenship: France
Principal Business: Private Equity Fund
% Interest: 10.8% (10.8% indirectly in iBasis)

To the knowledge of iBasis, no person or entity holds an indirect 10% beneficial ownership in iBasis as a result of its ownership in Swen Capital Partners SA.

The remaining shares of Tofane Global SAS are held by European and United States individuals or entities, including management, and, to the knowledge of iBasis, no other person has a 10% or greater interest in iBasis as a result thereof.

The following person has a shareholding greater than 10 percent of the direct voting and/or equity interest in Tofane SAS:

Name: Alexandre Pébereau
Address: 87 Boulevard du Montparnasse
75006 Paris, France
Citizenship: France
Principal Business: Telecommunications Executive
% Interest: 51% (17% indirectly in iBasis)

The remaining shares of Tofane SAS are held by European individuals or entities and, to the knowledge of iBasis, no other person has a 10% or greater interest in iBasis as a result thereof.

Ciclad 6 Professional Private Equity Investment Fund is a French private equity fund directly managed and controlled by:

Name:	Ciclad Gestion
Address:	22 Avenue Franklin Delano Roosevelt 75008 Paris, France
Citizenship:	France
Principal Business:	Private Equity Management Company
% Interest:	General Partner and Managing Company of Ciclad 6 (29.8% indirectly in iBasis)

The limited partners in Ciclad 6 Professional Private Equity Investment Fund are French and European investors. To the knowledge of iBasis, no limited partner in the fund holds an indirect 10% beneficial ownership in iBasis as a result of its holdings in the fund. To the knowledge of iBasis, no shareholder of Ciclad Gestion holds a 10 percent or greater indirect voting interest in iBasis.

The following persons and/or entities have a shareholding greater than 10 percent of the direct voting and/or equity interest in SCOR Capital Partners:

Name:	SCOR SE
Address:	5 Avenue Kleber 75016 Paris, France
Citizenship:	France
Principal Business:	Reinsurance
% Interest:	100% (11% indirectly in iBasis)

SCOR SE is a publicly-traded company listed on the Euronext stock exchange and its capital is widely held. To the knowledge of iBasis, no shareholder of SCOR SE holds an indirect 10% beneficial ownership in iBasis as a result of its holdings in SCOR SE.

Trocadero Croissance & Transmission II FPCI is a French private equity fund managed and controlled by its general partner:

Name:	Trocadero Capital Partners
Address:	44 Rue Paul Valéry 75116 Paris, France
Citizenship:	France
Principal Business:	Private Equity Management Company
% Interest:	100% (22% indirectly in iBasis)

The limited partners in Trocadero Croissance & Transmission II FPCI are French and European investors. To the knowledge of iBasis, no limited partner in the fund holds an indirect 10% beneficial ownership in iBasis as a result of its holdings in the fund.

The following persons have a shareholding greater than 10 percent of the direct voting and/or equity interest in Trocadero Capital Partners:

Name: Philippe Bruneau³
Address: 1 Place Charost
78000 Versailles, France
Citizenship: France
Principal Business: Private Equity Executive
% Interest: 48% equity and 53.34% voting

Name: Benjamin Fougerat
Address: 110 Bis Boulevard Malesherbes
75017 Paris, France
Citizenship: France
Principal Business: Private Equity Executive
% Interest: 32% equity and 35.55% voting

Name: Nicolas Gagnez⁴
Address: 4 rue Leconte de Lisle
75016 Paris, France
Citizenship: France
Principal Business: Private Equity Executive
% Interest: 20% equity and 11.11% voting

To the knowledge of iBasis, no other person or entity holds a direct or indirect 10 percent or-greater ownership interest in iBasis.

Response to Question 21:

Except as described below, iBasis does not have any interlocking directorates (e.g., persons or entities that perform the duties of director, president, vice president, secretary, treasurer, or other officer) with NICS:

Alexandre Pebereau is President and Director of both iBasis and NICS.

³ A portion of Mr. Bruneau's holding in Trocadero Capital Partners is held through BR Associés, a French holding company.

⁴ Mr. Gagnez's holding in Trocadero Capital Partners is held through XIRR Europe, a French holding company.

VERIFICATION

I, Ellen Schmidt, state that I am Vice President General Counsel and Corporate Secretary of iBasis, Inc. (the “Company”); that I am authorized to make this Verification on behalf of the Company; that the foregoing filing was prepared under my direction and supervision; and that the contents are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this
27th day of July, 2020.



Ellen Schmidt
Vice President General Counsel and Corporate
Secretary
iBasis, Inc.