



2654 W. Horizon Ridge Pkway
Suite 85-143
Henderson, NV 89052
Phone: (702) 777 2500
Fax: (702) 777 2501
www.telna.com
info@telna.com

Telecom North America Inc.
2654 W. Horizon Ridge Pkway • Suite 85-143 • Henderson, NV 89052

Henderson, June 19, 2014

VIA IBFS

Policy Division
International Bureau
Federal Communications Commission

VIA E-MAIL

U.S. Dep't. of Justice
Attn. Tyrone Brown
tyrone.brown@usdoj.gov

Re: Telecom North America, Inc. ("TNA")
FCC File No. ITC-T/C-20140507-00148
FCC File No. ISP-PDR-20140502-00002
Telecom North America Mobile, Inc. ("TNAM")
FCC File No. ISP-PDR-20131213-00012

To Whom It May Concern:

This letter is for filing in each of the above-referenced matters (collectively, the "TNA Requests"). This letter responds to a request for additional information from the staff of the FCC's Policy Division, and also reports changes in the indirect ownership of TNA (and thus also of its wholly-owned subsidiary, TNAM) which occurred on May 22, 2014,^[1] and of which TNA was not informed until after the filing of its previous supplement, on May 30, 2014.^[2] The Division had requested additional information about the ownership of Ki Corporation Limited ("Ki"), an indirect 50% owner of Knowroaming, Ltd. ("KRL").^[3] Finally, because the citizenship of the owners of the remaining 50% of KRL had been set forth in some but not all of the TNA Requests, we are here reporting again the citizenship of that remaining 50% (which information has not changed), so that the information will be a part of each individual TNA Request, and not have to be determined via cross-referencing.

I. Direct Ownership of KRL

As previously stated, KRL, a Canadian corporation, is owned as follows: Gregory Gundelfinger, 25%; Mathew Stein, 25%; and Carlyle, Kft. ("Carlyle"), 50%. Mr. Gundelfinger is a citizen of both South Africa and Germany, and a permanent resident of Canada. Mr. Stein is a citizen of South Africa, and a permanent resident of Canada. Carlyle is a Hungarian corporation. The foregoing information is the same as previously reported.

Previously, TNA reported that Carlyle, in turn, was owned directly by 100% by Ki, a Jersey corporation. TNA now reports that Carlyle is owned directly by Ki Unlimited, a British Virgin Islands ("BVI") corporation which, in turn, is owned 100% by Ki. Thus, although Ki still owns 100% of Carlyle, it now does so indirectly via Ki Unlimited, rather than directly.

II. Direct and Indirect Ownership and Control of Ki

There are two classes of stock in Ki – the class A shares and the class B shares. The A shares have economic rights but no voting rights. The B shares hold only voting rights (and nominal economic rights).

A. The Class A Shares

The A shares are registered in the name of Eurona Foundation ("Eurona-1"), a Liechtenstein foundation, as nominee for four BVI companies: Lyndhurst Holdings & Investment Limited; Parktown Investment Holdings Limited; Wendywood Investment Holdings Limited; and Kirsh Foundation Holdings Limited (collectively, the "BVI Companies"). Each of the BVI Companies beneficially owns 25% of the A shares in Ki.

Eurona-1 has two members of its governing board – Nathan and Prince Michael of Liechtenstein ("Michael"). Michael acts in his capacity as a private individual.

Each of the BVI Companies is owned by a BVI trust. Those four BVI trusts are: Philip Trust, Linda Trust, Wendy Trust, and Nathan Kirsh Foundation (collectively, the "BVI Trusts"). Nathan funded all four of the BVI Trusts. The beneficiaries of the BVI Trusts are: Frances Kirsh, Nathan's wife ("Frances"); Philip Kirsh, Nathan's son ("Philip"); Linda Mirels, one of Nathan's daughters ("Linda"); Wendy Fisher, the other of Nathan's daughters ("Wendy"); their remoter issue; and various charities. Nathan is not a beneficiary of any of the BVI Trusts.

The Guardian Trust Company, a BVI corporation, is the trustee of each of the BVI Trusts. Although the trustee has wide powers to administer each of the BVI Trusts, that power is somewhat circumscribed in that, under applicable law, each of the BVI Trusts has a "protector", separate from the trustee. In the case of the four BVI Trusts, that protector is the Eurona II Foundation ("Eurona-2"), a Liechtenstein foundation. As protector, Eurona-2 has substantial veto power over trustee decisions regarding distributions or other payments to beneficiaries.

The makeup of the governing board of Eurona-2 is discussed below, in Part II.C.

B. The Class B Shares

The B shares in Ki are held by Eurona-2. Through these shares, Eurona-2 controls Ki.

C. Eurona-2

There are six members of the governing board of Eurona-2; three "Class A" board members, and three "Class B" board members. (Note – these Class A and Class B *board seats* of Eurona-2 are separate and distinct from the Class A and Class B *shares* of Ki.) The three Eurona-2 Class A board members are Philip, Linda and Wendy. The three Eurona-2 Class B board members are Interstock Anstalt, Ron Sandler and Bradley Fried.

As set forth in the May 30 Supplement, Philip and Linda are U.S. citizens, while Wendy is a citizen of the United Kingdom. Interstock Anstalt is a Liechtenstein anstalt, Ron Sandler is a citizen of Germany, and Bradley Fried is a citizen of the United Kingdom. Interstock Anstalt is controlled by Michael. Michael acts in his capacity as a private individual.

The powers that Eurona-2 holds in its capacity as protector of the BVI Trusts (see Part II.B above) is exercised exclusively by the Class B board members, acting by majority vote among the three of them. Except as to its position as protector of the BVI Trusts, Eurona-2 acts by majority vote of its entire six-person board; this includes voting the class B shares it owns in Ki.

Each board member of Eurona-2 holds the power to appoint his/her/its successor as board member, and to later change his/her/its mind and remove any successor so appointed, except that neither Nathan nor any spouse or descendant of Nathan (collectively, a "Nathan Relative"), or

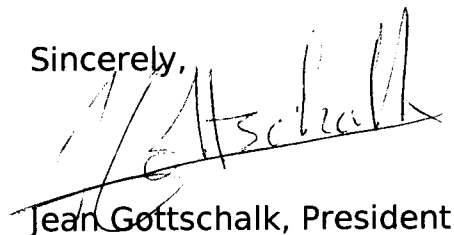
any employee of or entity controlled by any Nathan Relative, is eligible to be a Class B board member.

Conclusion

I declare under penalty of perjury that the foregoing statements are true, to the best of my knowledge, information and belief. TNA believes that, as supplemented herein, the TNA Requests are ripe for grant.

Please direct any questions concerning this supplemental filing to TNA's counsel, David J. Kaufman, 202-955-5516, dkaufman@rinioneil.com.

Sincerely,



Jean Gottschalk, President

cc (via e-mail):

David Krech, FCC
Susan O'Connell, FCC
FIRS-TT@usdoj.gov
ttwg@leo.gov
IP-FCC@HQ.DHS.GOV
TeamTelecom@osd.mil
Marilyn Shaifer, DOJ
Shahram Hojati, DOJ

[1] TNA is advised that these May 22, 2014 changes were a restructuring which was undertaken as part of the estate planning for Mr. Nathan Kirsh ("Nathan").

[2] That May 30, 2014 supplement ("May 30 Supplement") was delivered to the Department of Justice on the next business day, Monday, June 2, 2014.

[3] KRL currently owns 24.99% of TNA, and is seeking FCC consent to increase that ownership percentage to 50%. See File Nos. ISP-PDR-20140502-00002 and ITC-T/C-20140507-00148.