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August 28, 2015

Ms. Marlene Dortch Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re: Supplement to Tampnet Inc. Petition for Declaratory Ruling Under Section 310(b)(4); File No. ISP-PDR-20150507-00003

Dear Ms. Dortch:

Tampnet Inc. ("Tampnet"), through counsel, submit the following information to supplement the pending Petition for Declaratory Ruling ("Petition") in the above-referenced proceeding.

Section II.E (pages 3-4) of the Petition is amended to revise the disclosure of individuals or entities with a ten percent or greater interest in the licensee, Tampnet Licensee LLC, and to request specific approval of those uninsulated individuals or entities holding a greater than five percent voting or equity interest in the licensee.

Attached to this supplement is a revised Section II.E. and a new Section II.F to the Petition that includes additional information related to Tampnet's organizational structure and requests specific approval for several entities in accordance with the Commission's rules. Additionally, attached to this supplement is a revised Exhibit A to the Petition, which includes a revised organizational chart for Tampnet, a new Exhibit B to the Petition, which is a new certification from Tampnet, and a new Exhibit C, which lists the entities for which specific approval is requested and the information required by 47 C.F.R. § 1.991(j).

Thank you for your assistance with this matter. Please contact me for any additional questions that may arise.

### Sincerely,

/s/ K.C. Halm
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Counsel to Tampnet Inc.

ce: Susan O'Connell, International Bureau Kimberly Cook, International Bureau

### E. Ownership Interests<sup>1</sup>

Tampnet Licensee LLC is a wholly-owned subsidiary of Tampnet Inc., a United States corporation.

Tampnet Inc. is a wholly-owned subsidiary of Tampnet AS, a corporation organized under the laws of Norway.

Tampnet AS is a wholly-owned subsidiary of Brent Invest AS, a corporation organized under the laws of Norway.

Brent Invest AS is a wholly owned subsidiary of Brent Holding AS, a corporation organized under the laws of Norway.

Brent Holding AS is a subsidiary of Brent Infrastructure I BV, a limited liability company organized under the laws of the Netherlands which owns 94.92% of the company. The remaining 5.08% interest in Brent Holding AS is held by individual shareholders. None of the shareholders individually hold more than 5% interest in Tampnet and they are insulated as defined by 47 C.F.R. §§ 1.991, 1.993 ("Insulated").

Brent Infrastructure I BV is a 50-50 joint venture of Brent Infrastructure I S.à.r.l. and Brent Infrastructure II SA. Brent Infrastructure I S.à.r.l. and Brent Infrastructure II SA are Insulated. The day-to-day business operations, activities, or decisions of Brent Infrastructure I BV are handled by three non-member managers ("Directors") as shown on Page 7 of the ownership diagram, attached as Exhibit B.

<sup>&</sup>lt;sup>1</sup> The legal forms of organization identified herein are referenced by the equivalent forms under U.S. law. Thus, companies organized as: B.V., S.à.r.l., GmbH entities are identified as limited liability companies; AB, SA, AS entities are identified as corporations; KG entities are identified as limited partnerships; Ltd. or Limited entities are identified as corporations (whose shares not publically traded); and, cooperatief entities are identified as cooperatives.

Brent Infrastructure I S.à.r.l, a limited liability corporate entity organized under the laws of Luxembourg, is wholly owned by Brent Holding Guernsey Limited. The day-to-day business operations, activities, or decisions of Brent Infrastructure I S.a.r.l. are handled by four non-member managers (Directors) as shown on Page 6 of the ownership diagram (Exhibit B).

Brent Holding Guernsey Limited, a limited company organized under the laws of Guernsey, is 98.65% owned by several limited partnerships, two of which have disclosable interests and are limited partnerships organized under the laws of Guernsey: EQT Infrastructure (No. 1) Limited Partnership, a limited partnership organized under the laws of England and Wales, and EQT Infrastructure (No. 3) Limited Partnership a limited partnership organized under the laws of England. For simplicity, the limited partnerships are referred to as "EQT Infrastructure Fund"; however, EQT Infrastructure Fund has no legal presence.

Each limited partnership in EQT Infrastructure Fund is managed and controlled by a general partner, EQT Infrastructure (General Partner) LP, a limited partnership organized under the laws of Guernsey, which holds a 1% equity interest in EQT Infrastructure Fund (which corresponds to a 1% interest in each limited partnership). None of the limited partners holding interests in the limited partnerships that comprise the EQT Infrastructure Fund holds 10% or more of the equity or voting interest in Tampnet, and all of which are Insulated. EQT Infrastructure (General Partner) LP has three general partners: EQT Infrastructure Limited, EQT Infrastructure LLP, and EQT V GmbH & Co. KG.

EQT Infrastructure LLP, a limited liability partnership organized under the laws of Guernsey, manages or controls the day-to-day business operations, activities, or decisions of EQT Infrastructure (General Partner) LP. EQT Infrastructure LLP is 100% indirectly owned by SEP Holdings BV. SEP Holdings BV holds that interest through its respective interests in EQT

Infrastructure Limited, a private corporation organized under the laws of Guernsey, and EQT Funds Management Limited, a private corporation organized under the laws of Guernsey, each of whom hold a 50% interest in EQT Infrastructure LLP.

Although IGPE LP, a limited partnership organized under the laws of Guernsey, and EQT V GmbH & Co. KG, a limited partnership organized under the laws of Germany, are additional general partners of EQT Infrastructure (General Partner) LP, under the partnership agreement, neither has the ability to control or be involved in the day-to-day business operations, activities, or decisions of EQT Infrastructure (General Partner) LP.

Karl Heinz Horrer, an individual of German citizenship holds a 100% limited partnership interest in EQT V GmbH & Co. KG. EQT V Verwaltung GmbH, a limited liability company organized under the laws of Germany is the general partner of in EQT V GmbH & Co. KG. CBTJ Financial Services B.V., a limited liability company organized under the laws of the Netherlands, owns 100% of EQT V Verwaltung GmbH.

EQT OppGreChEC B.V., a limited liability company organized under the laws of Guernsey, owns 23.08% of CBTJ Financial Services B.V. Three entities have a disclosable interest in EQT OppGreChEC B.V.: EQT Expansion Capital II B.V., a limited liability company organized under the laws of the Netherlands; EQT Greater China II Equity B.V., a limited liability company organized under the laws of the Netherlands; and, EQT Opportunity Equity B.V., a limited liability company organized under the laws of the Netherlands.

In addition, EQT 4M Equity B.V., a limited liability company organized under the laws of the Netherlands owns 15.38% of CBTJ Financial Services. EQT IV Equity B.V., a limited liability company organized under the laws of the Netherlands owns 91.88% of EQT 4M Equity B.V. Both of these companies are handled by three non-member managers (Directors) as shown

on Page 4.3 of the ownership diagram (Exhibit B). CBTJ XIII Holding B.V., a limited liability company organized under the laws of the Netherlands, owns 65.95% of EQT IV Equity B.V.

SEP Holdings BV, a limited liability company organized under the laws of the Netherlands, is owned by seven entities, all of which are Insulated, and only three of which hold a 10% or more interest in Tampnet: SEP 1 Holding B.V., SEP 2 Holding B.V., and SEP 3 Holding B.V. SEP Holdings BV is managed and controlled by the non-member managers listed on Page 5 of Exhibit B.

SEP 1 Holding B.V., a limited liability company organized under the laws of the Netherlands, is owned by six entities, all of which are Insulated, and only one of which holds a 10% or more interest in Tampnet: SEP 4 Holding B.V., a limited liability company organized under the laws of the Netherlands. SEP 1 Holding B.V. is managed and controlled by the non-member managers (Directors) listed on Page 4 of Exhibit B.

SEP 2 Holding B.V., a company limited by shares organized under the laws of the Netherlands, is owned by three entities, all of which are Insulated and only one of which holds a 10% or more interest in Tampnet: Rakso Holding B.V., a limited liability company organized under the laws of the Netherlands. Two individuals hold a 50% interest each in Rakso Holding B.V.: Christian Sinding, a Norwegian citizen and Casper Callerstrom a Swedish citizen. SEP 2 Holding B.V. and Rakso Holding B.V. are managed and controlled by the non-member managers (Directors) listed on Page 4.1 of Exhibit B.

SEP 3 Holding B.V., a company limited by shares organized under the laws of the Netherlands, is owned by six entities, all of which are Insulated and none of which holds a 10% or more interest in Tampnet. SEP 3 Holding B.V. is managed and controlled by the non-member managers (Directors) listed on Page 4.2 of Exhibit B.

SEP 4 Holding B.V., a company limited by shares organized under the laws of the Netherlands, is owned by two entities and one individual, all of which are Insulated and none of which holds a 10% or more interest in Tampnet. SEP 4 Holding B.V. is managed and controlled by the non-member managers listed on Page 4 of Exhibit B.

Brent Infrastructure II SA, a public limited company organized under the laws of Luxembourg, is a wholly owned subsidiary of Brent Infrastructure Holding BV.

Brent Infrastructure Holding BV, a company limited by shares organized under the laws of the Netherlands, is a wholly owned subsidiary of Brent Infrastructure II Holding S.à.r.l. Brent Infrastructure II Holding S.à.r.l. is Insulated. Brent Infrastructure Holding BV and Brent Infrastructure II Holding S.à.r.l. are managed and controlled by the non-member managers (Directors) listed on Page 3 of Exhibit B.

Brent Infrastructure II Holding S.à.r.l., a limited liability corporate entity organized under the laws of Luxembourg, is 98.96% owned by EQT Infrastructure II Limited Partnership.

EQT Infrastructure II Limited Partnership, a limited partnership organized under the laws of the Netherlands, is wholly-owned by four limited partnerships. Only two of the limited partnerships hold a 10% or more interest in Tampnet: EQT Infrastructure II (No. 1) Feeder LP, a limited partnership organized under the laws of the U.K., and EQT Infrastructure II (No. 2) Feeder LP, a limited partnership organized under the laws of the U.K. The limited partners of EQT Infrastructure II Limited Partnership are Insulated. EQT Infrastructure II Limited Partnership is managed and controlled by its general partner, EQT Infrastructure II GP B.V., a company limited by shares organized under the laws of the Netherlands.

EQT Infrastructure II GP B.V. is a wholly owned subsidiary of EQT Holdings II B.V., a limited liability company organized under the laws of the Netherlands. EQT Holdings II B.V. is

Insulated. EQT Infrastructure II GP BV, a limited liability company organized under the laws of the Netherlands, is managed and controlled by a non-member manager, EQT Netherlands

Management B.V., a limited liability company organized under the laws of the Netherlands.

EQT Netherlands Management BV is a wholly-owned subsidiary of EQT Holdings AB, a private corporation organized under the laws of Sweden.

EQT Holdings II B.V., a limited liability company organized under the laws of the Netherlands, and EQT Holdings B.V., a limited liability company organized under the laws of the Netherlands, are both wholly owned subsidiaries of EQT Holdings AB. EQT Holdings AB is Insulated. EQT Holdings B.V. and EQT Holdings II B.V. are managed and controlled by the non-member managers (Directors) listed on page 2 of Exhibit B.

None of the limited partners in EQT Infrastructure II (No. 1) Feeder LP and EQT Infrastructure II (No. 2) Feeder LP hold a 10% or more interest in Tampnet and all are Insulated. EQT Infrastructure II (No. 1) Feeder LP and EQT Infrastructure II (No. 2) Feeder LP are managed and controlled by a general partner, EQT Infrastructure II (GP) Limited, a private corporation organized under the laws of the U.K. EQT Infrastructure II (GP) Limited is a wholly owned subsidiary of EQT Holdings AB.

Investor Investments Holding AB, a corporation organized under the laws of Sweden, holds a 1.61% interest in Tampnet Inc. and is Insulated.

EQT International Holdings B.V., a limited liability company organized under the laws of the Netherlands, holds a 100% interest in Tampnet Inc. and is a wholly owned subsidiary of EQT Holdings Coöperatief W.A. EQT Holdings Coöperatief W.A. is Insulated. EQT International Holdings B.V. is managed and controlled by the non-member managers (Directors) listed on page 1 of Exhibit B.

EQT Holdings Coöperatief W.A., a cooperative organized under the laws of the Netherlands, is owned by several entities, none of which hold 10% or more of an interest in Tampnet Inc. EQT Holdings Coöperatief W.A. is managed and controlled by the non-member managers (Directors) listed on page 1 of Exhibit B. EQT Holdings I B.V., a limited liability company organized under the laws of the Netherlands; EQT Holdings II B.V., a limited liability company organized under the laws of the Netherlands; CM Capital B.V., a limited liability company organized under the laws of the Netherlands; and Stichting Bawau an individual who is a citizen of the Netherlands, each hold greater than 10% interest in EQT Holdings Cooperatief W.A.

Attached as Exhibit B is a chart illustrating the relationship of these entities to and ownership structure of Tampnet and their respective equity and voting interest in Tampnet.

#### F. REQUEST FOR SPECIFIC APPROVAL

Pursuant to Section 1.992(i) of the Commission's rules, specific approval is requested for the entities and individuals list in Exhibit B that hold, directly or indirectly, a controlling interest in Tampnet or more than five percent of the equity or voting interest of Tampnet.

### **List of Exhibits**

**Exhibit A** Certification of Per Helge Svensson

**Exhibit B** Ownership Diagram

**Exhibit C** Requests for Specific Approval

## EXHIBIT A Certification of Per Helge Svensson

#### Certification of Per Helge Svensson

I, Per Helge Svensson do hereby certify under penalty of perjury under the laws of the United States of America that:

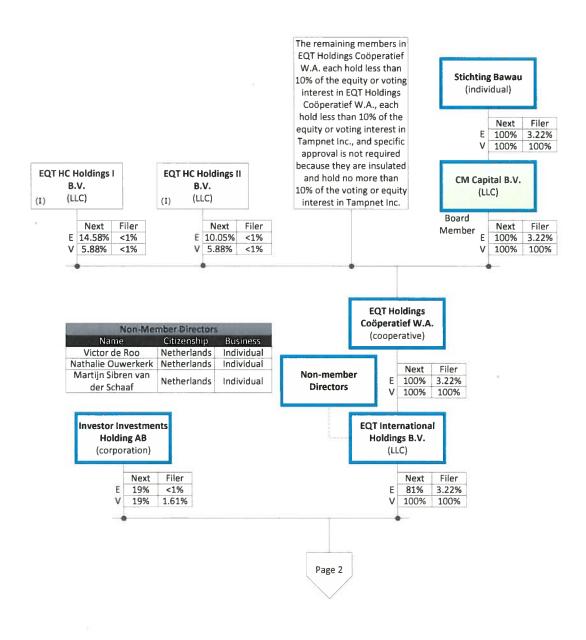
- I am President of Tampnet Inc., and have been authorized by that company's Board of Directors to submit this certification on behalf of that company;
- 2. I have read the foregoing Supplement to the Petition for Declaratory Ruling ("Supplement") and am generally familiar with its contents;
- With respect to statements made in the Supplement, other than those of which official notice
  can be taken, the facts contained therein are true and correct to the best of my personal
  knowledge, information, and belief; and
- 4. To the best of my knowledge information and belief, the levels of foreign ownership presented in the Petition were calculated in accordance with the requirements set forth in section 1.992 of the Commission's rules as implemented by the FCC's Second Report and Order on Foreign Ownership Policies. See Review of Foreign Ownership Policies for Common Carrier and Aeronautical Radio Licensees under Section 310(b)(4) of the Communications Act of 1934, as amended, Second Report and Order, 28 FCC Rcd 5741 (2013).

Executed on August 2, 2015.

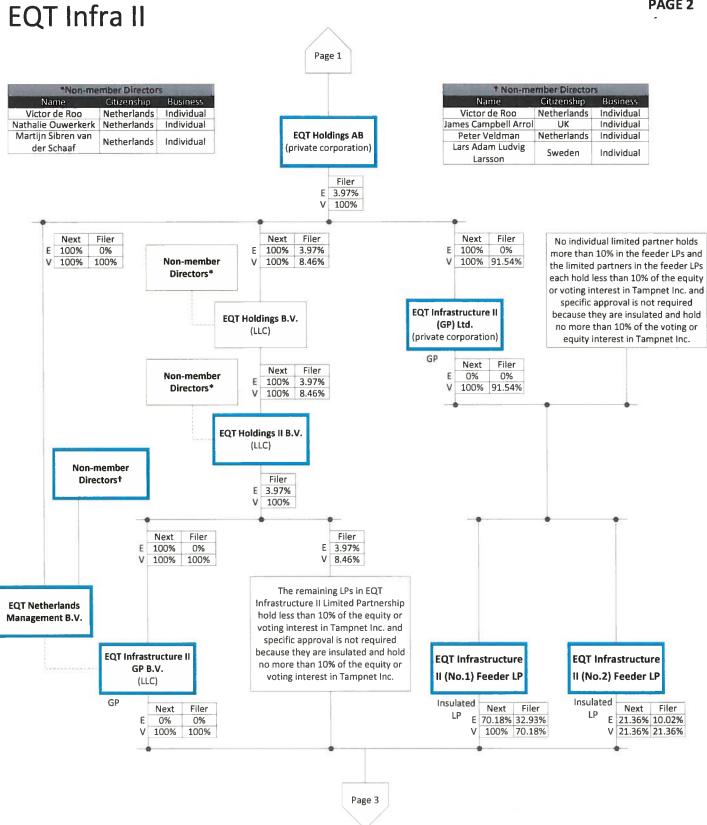
Per Helge Svensson

### EXHIBIT B Ownership Diagram

### **EQT Infra II**



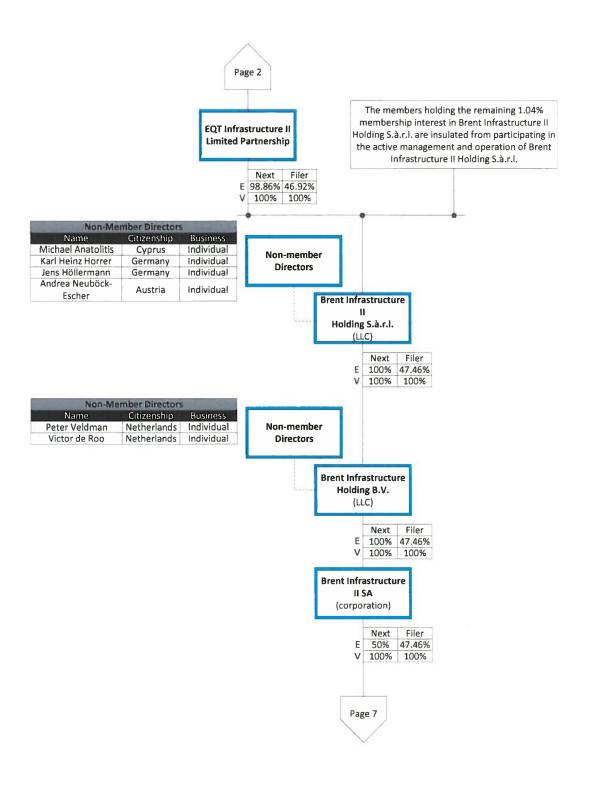
Specific Approval Entity E= Equity Interest V=Voting Interest Next = Interest in next entity in structure Filer = Interest in Tampnet Inc.



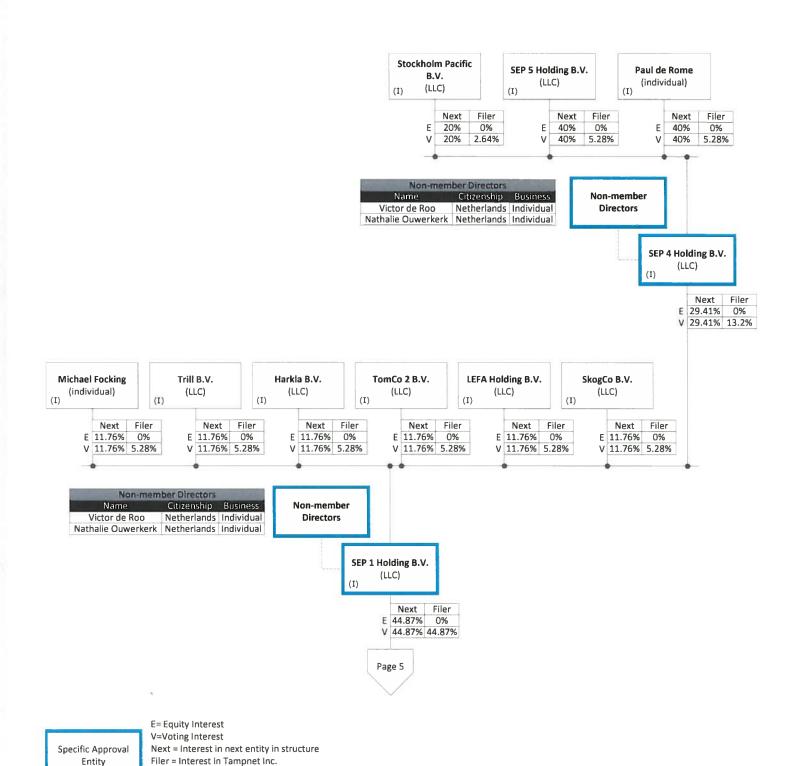
Specific Approval Entity

E= Equity Interest V≈Voting Interest Next = Interest in next entity in structure Filer = Interest in Tampnet Inc.

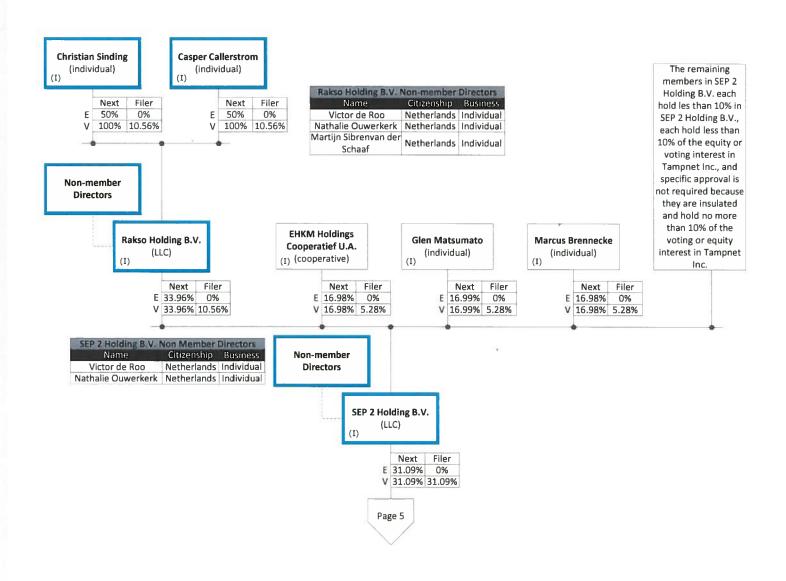
## **EQT Infra II**



Specific Approval Entity E= Equity Interest V≈Voting Interest Next = Interest in next entity in structure Filer = Interest in Tampnet Inc.

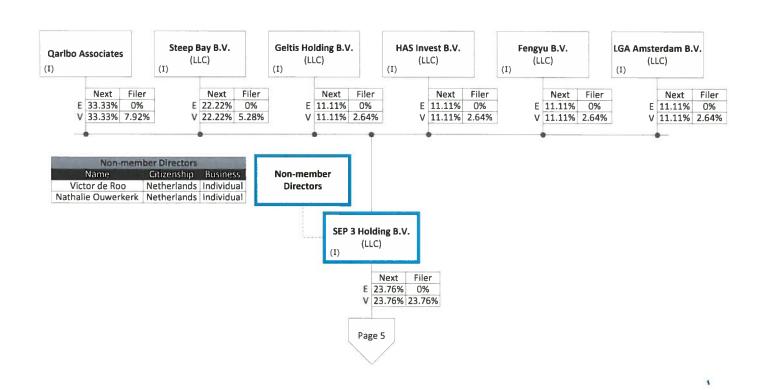


(I) = Insulated (as determined in accordance with 1.993)



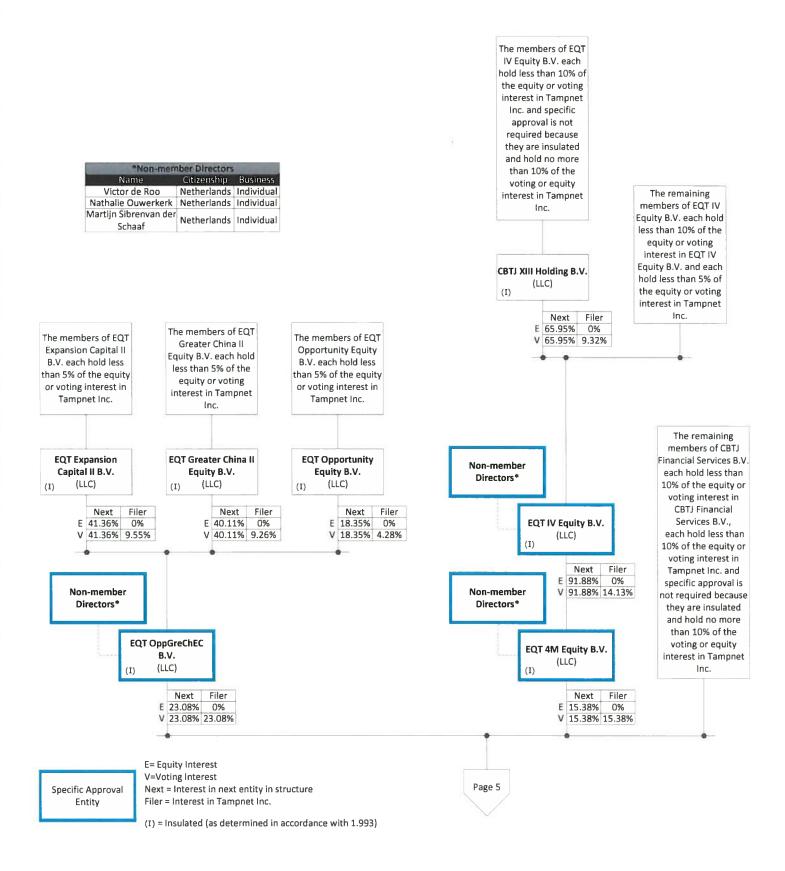
Specific Approval Entity E= Equity Interest V=Voting Interest Next = Interest in next entity in structure Filer = Interest in Tampnet Inc.

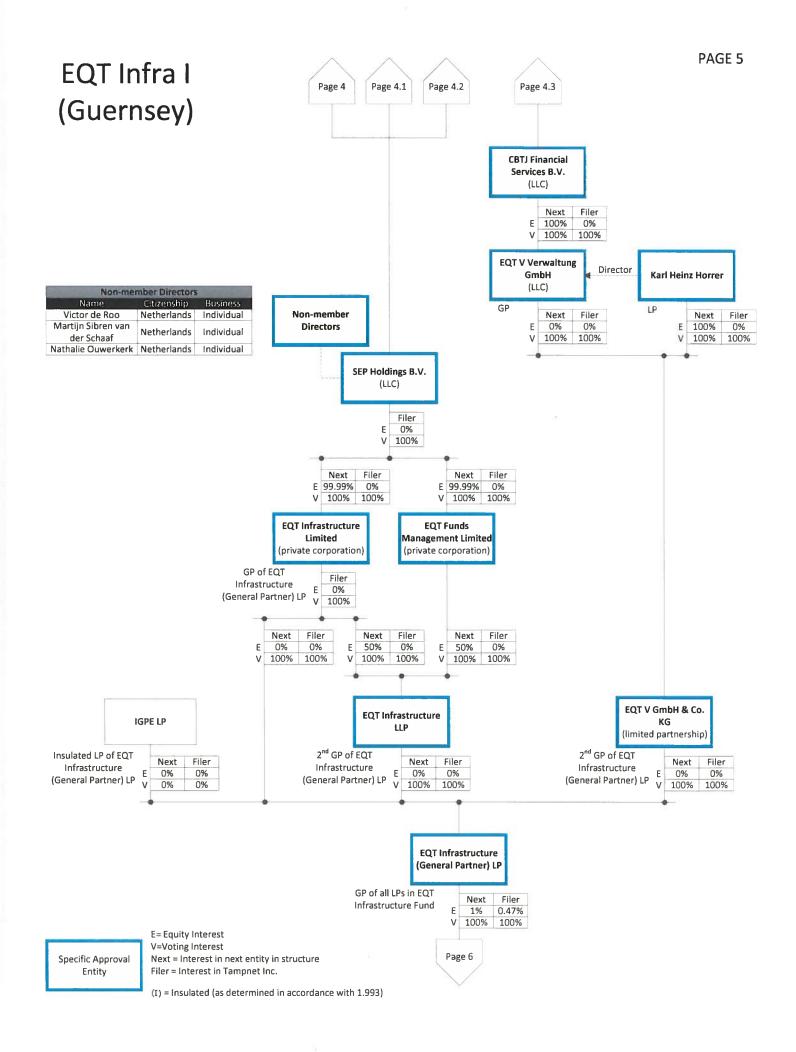
(I) = Insulated (as determined in accordance with 1.993)

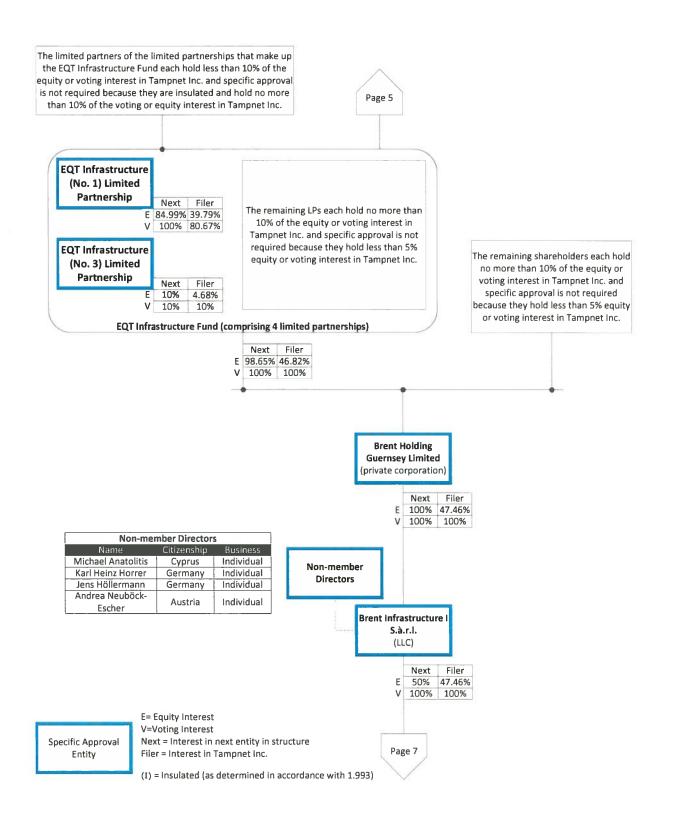


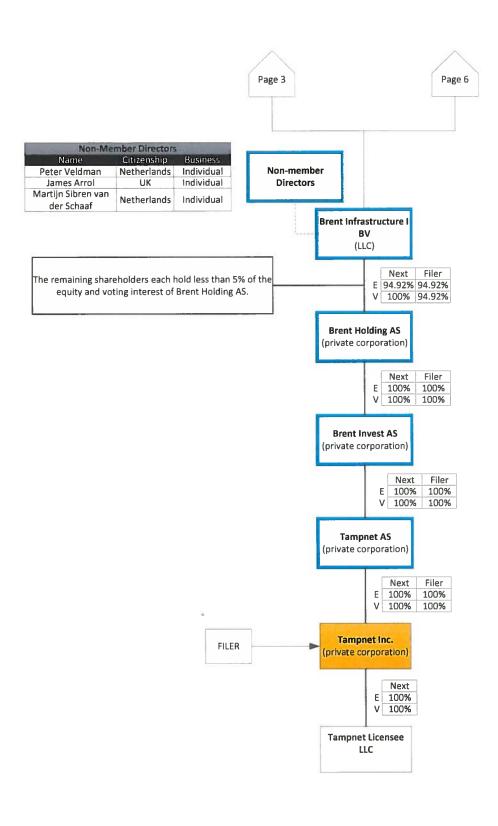
Specific Approval Entity E= Equity Interest V=Voting Interest Next = Interest in next entity in structure Filer = Interest in Tampnet Inc.

(I) = Insulated (as determined in accordance with 1.993)









Specific Approval Entity E= Equity Interest V=Voting Interest Next = Interest in next entity in structure Filer = Interest in Tampnet Inc.

## EXHIBIT C Entities and Individual Seeking Specific Approval

Name	Citizenship or Place of Organization	Type of Organization	Principal Business
1. Tampnet AS	Norway	Private Corp.	Telecommunications
2. Brent Invest AS	Norway	Private Corp.	Investment
3. Brent Holding AS	Norway	Private Corp.	Investment
4. Brent Infrastructure I BV	Netherlands	Limited Liability Corp.	Investment
5. Brent Infrastructure I S.à.r.l	Luxembourg	Limited Liability Corp.	Investment
6. Brent Holding Guernsey Limited	Guernsey	Private Corp.	Investment
7. EQT Infrastructure (No. 1) Limited Partnership	England and Wales	Limited Partnership	Investment
8. EQT Infrastructure (No. 3) Limited Partnership	England	Limited Partnership	Investment
9. EQT Infrastructure (General Partner) LP	Guernsey	Limited Partnership	Investment
10. EQT Infrastructure LLP	Guernsey	Limited Liability Partnership	Investment
11. EQT V GmbH & Co. KG	Germany	Limited Partnership	Investment
12. EQT V Verwaltung GmbH	Germany	Limited Liability Corp.	Investment
13. CBTJ Financial Services B.V.	Netherlands	Limited Liability Corp.	Investment
14. EQT Infrastructure Limited	Guernsey	Private Corp.	Investment
15. EQT Funds Management Limited	Guernsey	Private Corp.	Investment
16. SEP Holdings B.V.	Netherlands	Limited Liability Corp.	Investment
17. SEP 1 Holding B.V.	Netherlands	Limited Liability Corp.	Investment
18. SEP 2 Holding B.V.	Netherlands	Limited Liability Corp.	Investment
19. SEP 3 Holding B.V.	Netherlands	Limited Liability Corp.	Investment
20. SEP 4 Holding B.V.	Netherlands	Limited Liability Corp.	Investment
21. Victor de Roo	Netherlands	Individual	N/A
22. Nathalie Ouwerkerk	Netherlands	Individual	* N/A
23. Martjin Sibrenvan der Schaaf	Netherlands	Individual	N/A
24. Rakso Holding B.V.	Netherlands	Limited Liability Corp.	Investment
25. Christian Sinding	Norwegian	Individual	N/A
26. Casper Callerstrom	Swedish	Individual	N/A
27. EQT OppGreChEC B.V.	Netherlands	Limited Liability Corp.	Investment
28. EQT 4M Equity B.V.	Netherlands	Limited Liability Corp.	Investment
29. EQT IV Equity B.V.	Netherlands	Limited Liability Corp.	Investment
30. Brent Infrastructure II SA	Luxembourg	Corporation	Investment
31. Brent Infrastructure Holding B.V.	Netherlands	Limited Liability Corp.	Investment
32. Peter Veldman	Netherlands	Individual	N/A
33. Brent Infrastructure II Holding S.à.r.l	Luxembourg	Limited Liability Corp.	Investment
34. Michael Anatolis	Cyprus	Individual	N/A
35. Karl Heinz Horrer	Germany	Individual	N/A
36. Jens Hollermann	Germany	Individual	N/A

37. Andrea Neubock-Escher	Austria	Individual	N/A
38. EQT Infrastructure II Limited Partnership	Netherlands	Limited Partnership	Investment
39. EQT Infrastructure II GP B.V.	Netherlands	Limited Liability Corp.	Investment
40. EQT Infrastructure II (No. 1) Feeder LP	U.K.	Limited Partnership	Investment
41. EQT Infrastructure II (No. 2) Feeder LP	U.K.	Limited Partnership	Investment
42. EQT Holdings II B.V.	Netherlands	Limited Liability Corp.	Investment
43. EQT Infrastructure II (GP) Ltd.	U.K.	Private Corp.	Investment
44. EQT Netherlands Management B.V.	Netherlands	Limited Liability Corp.	Investment
45. EQT Holdings AB	Sweden	Private Corp.	Investment
46. James Campbell Arrol	UK	Individual	N/A
47. Lars Adam Ludvig Larsson	Sweden	Individual	N/A
48. Investor Investments Holding AB	Sweden	Corporation	Investment
49. EQT International Holdings B.V.	Netherlands	Limited Liability Corp.	Investment
50. EQT Holdings Cooperatief W.A.	Netherlands	Cooperative	Investment
51. CM Capital B.V.	Netherlands	Limited Liability Corp.	Investment
52. Stichting Bawau	Netherlands	Individual	N/A