

March 11, 2016

VIA IBFS

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

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

Dear Ms. Dortch:

Tampnet Inc. ("Tampnet"), through counsel, submits the following supplemental information and explanation of ownership interests to further supplement and support the relief requested in Tampnet's pending Petition for Declaratory Ruling in the above-referenced proceeding.

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

Sincerely,

/s/ K.C. Halm

K.C. Halm
Richard Gibbs
Davis Wright Tremain LLP
1919 Pennsylvania Ave., NW, Suite 800
Washington, DC 20006
(202) 973-4200
kchalm@dwt.com

Counsel to Tampnet Inc.

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

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Tampnet Inc.)	
)	File No. ISP-PDR-2015-0507-00003
Petition for Declaratory Ruling Under Section)	
310(b)(4) of the Communications Act of 1934,)	
as amended)	

PETITION FOR DECLARATORY RULING

Tampnet Inc. (“Tampnet”), pursuant to Section 1.990 *et seq.* of the Federal Communications Commission (“Commission”) rules, hereby requests that the Commission issue a declaratory ruling under Section 310(b)(4) of the Communications Act, as amended (the “Act”), finding that 100 percent indirect foreign ownership of Tampnet Licensee LLC (“Tampnet Licensee”), a wholly owned subsidiary of Tampnet, and any of Tampnet’s subsidiaries and affiliates, whether currently existing or subsequently formed or acquired, is in the public interest. This petition is being submitted in connection with an application seeking the Commission’s consent to modify the regulatory status of microwave licenses held by Tampnet Licensee from private to common carrier, and pending acquisition of licenses from Broadpoint.¹ Because Tampnet Licensee is 100 percent indirectly owned by a foreign entity, this change in regulatory status requires the Commission’s approval under Section 310(b)(4) of the Act.

I. BACKGROUND

On August 1, 2014, Tampnet, the parent of Tampnet Licensee, consummated a transaction in which it acquired a non-common carrier wireless service and 38 private carrier

¹See ULS File No. 0006893377.

microwave licenses (the “Licenses”) from AirTap Communications, LLC.² Because the Licenses acquired from AirTap were not operated on a common carrier basis, Section 310(b) was not implicated when the Commission approved Tampnet’s acquisition of the Licenses in 2014.

Prior to filing this petition Tampnet assigned the Licenses to Tampnet Licensee through a *pro forma* assignment, which was consummated on May 1, 2015.³ Contemporaneous with this petition Tampnet Licensee is filing an application to modify the microwave Licenses it holds to change the regulatory status of those licenses from private to common carrier. Upon the grant of the application, Tampnet Licensee will be the holder of the reclassified common carrier microwave Licenses, which, as described below, requires the Commission’s approval under Section 310(b)(4) of the Act because Tampnet Licensee is 100 percent indirectly owned by Tampnet AS, a company organized under the laws of Norway.

II. INFORMATION REQUIRED BY 47 C.F.R. § 1.991

A. Applicant Information

Name: Tampnet Inc.
FRN: 0023627375
Address: 220 Burgess Drive, Suite 4
Broussard, LA 70518
Telephone: (337) 205-8751
Fax: (281) 846-7100
Email: hex@tampnet.com

Tampnet is a corporation organized under the laws of the state of Delaware.

²See ULS File No. 0006297445 (FCC Form 603 seeking Commission consent to the assignment of thirty-seven Microwave Industrial/Business Pool licenses and one 3650-3700 MHz license) (action date Aug. 13, 2014).

³See ULS File No. 0006787088 (FCC Form 603 seeking Commission consent to the *pro forma* assignment of thirty-eight Microwave Industrial/Business Pool licenses and one NN – 3650-3700 MHz non-common carrier license).

Attached as Exhibit A is the certification of Carl Sjolund, certifying the information contained in the petition.

B. Legal Counsel

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C. Applicant's Authorized Radio Services

Tampnet, through Tampnet Licensee, currently holds one NN – 3650-3700 MHz non-common carrier license and 38 MG - Microwave Industrial/Business Pool private microwave licenses. As described herein, concurrent with the filing of this petition, Tampnet is also filing with the Commission a request to convert the private carrier MG - Microwave Industrial/Business Pool microwave licenses to common carrier status. In addition, Tampnet has filed an application to acquire certain cellular and AWS licenses from Broadpoint.⁴

D. Type of Declaratory Ruling Requested

Tampnet is requesting a declaratory ruling under Section 310(b)(4) of the Act and Section 1.990(a)(1) of the Commission's rules. Additionally, pursuant to Section 1.994(a)(1), Tampnet is also requesting that any declaratory ruling issued apply to all of Tampnet's subsidiaries and affiliates, whether currently existing or subsequently formed or acquired.

⁴See *supra*, n. 1.

Finally, advance approval is sought for the entities seeking specific approval in this petition to increase their interests up to and including a non-controlling 49.99% equity and/or voting interest in Tampnet Inc.

E. Ownership Interests

1. Disclosable Interests

The specific equity and voting interests of all disclosable interest holders (“Disclosable Interest Holders”) in Tampnet Inc. is set forth in the ownership diagram in Exhibit B. The equity and voting interests for each of the individuals and entities reflected in the ownership diagram are calculated according to the Commission’s attribution rules and reflect the aggregate interests of the individuals and entities disclosed on the diagram. The following narrative explanation is intended to mirror the description of interests as set forth in the ownership diagram (Exhibit B).

Tampnet Licensee LLC (as shown on p. 1, Exh. B) 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 B.V., 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, each of whom hold less than 5% equity or voting).

Brent Infrastructure I B.V. is a 50-50 joint venture of Brent Infrastructure I S.à.r.l. and Brent Infrastructure II SA. The day-to-day business operations, activities, or decisions of Brent Infrastructure I B.V. are handled by three non-member managers (Directors) as shown on Page 1 of the ownership diagram, attached as Exhibit B.

Brent Infrastructure I S.à.r.l (p. 2, Exh. B), 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.à.r.l. are handled by four non-member managers (Directors) as shown on Page 2 of the ownership diagram (Exh. B).

Brent Holding Guernsey Limited, a private 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 the “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 remaining 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 (p. 3, Exh. B), a limited liability partnership organized under the laws of Guernsey, is 100% indirectly owned by SEP Holdings B.V. SEP Holdings B.V. 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 EQT Infrastructure LLP 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 is the sole director of EQT V Verwaltung GmbH. EQT V Verwaltung GmbH, a limited liability company organized under the laws of Germany, is the general partner of EQT V GmbH & Co. KG.

SEP Holdings B.V., a limited liability company organized under the laws of the Netherlands, is owned by four entities, only two of which hold a 10% or more interest in Tampnet: SEP Integrated I B.V. and SEP Integrated II B.V. SEP Holdings B.V. is managed and controlled by the non-member managers (Directors) listed on Page 3 of Exhibit B. The shareholders/members of SEP Holdings B.V. are insulated (as described in the certification attached as Exhibit D).

SEP Integrated I B.V. (p. 7, Exh. B), a limited liability company organized under the laws of the Netherlands, is owned by 8 entities and individuals, all of which are insulated, and 6 of which hold a 10% or more interest in Tampnet: SEPCO B.V., a limited liability company organized under the laws of the Netherlands, SkogCo B.V., Trill B.V., TomCo 2 B.V., Michael Föcking, and Paul de Rome. SEP Integrated I B.V. is managed and controlled by the non-member managers (Directors) listed on Page 7 of Exhibit B.

SEP Integrated II B.V. (p. 7, Ex. B), a limited liability company organized under the laws of the Netherlands, is owned by 12 entities and individuals, all of which are insulated and only two of which hold a 10% or more interest in Tampnet: Rakso Holding B.V., a limited liability company organized under the laws of the Netherlands and Qarlbo Associates. Two individuals hold a 50% interest each in Rakso Holding B.V.: Christian Sinding, a Norwegian citizen and Casper Callerstrom a Swedish citizen. Rakso Holding B.V. is managed and controlled by the non-member managers (Directors) listed on Page 10 of Exhibit B.

Brent Infrastructure II SA (p. 4, Ex. B), a public limited company organized under the laws of Luxembourg, is a wholly owned subsidiary of Brent Infrastructure Holding B.V.

Brent Infrastructure Holding B.V., a limited liability company organized under the laws of the Netherlands, is a wholly owned subsidiary of Brent Infrastructure II Holding S.à.r.l. Brent Infrastructure Holding B.V. and Brent Infrastructure II Holding S.à.r.l. are managed and controlled by the non-member managers (Directors) listed on Page 4 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 (pp. 4-5, Ex. B). 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 limited liability company organized under the laws of the Netherlands.

None of the limited partners in EQT Infrastructure II (No. 1) Feeder LP and EQT Infrastructure II (No. 2) Feeder LP (p. 5, Exh. B) 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 AB.

EQT Infrastructure II GP B.V. (p. 5, Exh. B) is a wholly owned subsidiary of EQT Holdings II B.V., a limited liability company organized under the laws of the Netherlands. EQT Infrastructure II GP B.V., 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 B.V. (p. 5, Exh. B) is a wholly-owned subsidiary of EQT AB, a private corporation organized under the laws of Sweden.

EQT Holdings B.V., a limited liability company organized under the laws of the Netherlands, is a wholly owned subsidiary of EQT AB. EQT Holdings II B.V., a limited liability company organized under the laws of the Netherlands, is owned by CBTJ Financial Services B.V., Investor Netherlands B.V., and EQT Holdings B.V. EQT Holdings B.V. and EQT

Holdings II B.V. are managed and controlled by the non-member managers (Directors) listed on page 5 of Exhibit B.

The Knut and Alice Wallenberg Foundation (p. 6, Exh. B), a foundation formed under the laws of Sweden, holds an indirect 14.58% calculated voting interest in Tampnet Inc. through the following entities: Investor AB,⁵ a public corporation formed under the laws of Sweden; Investor Investment Holdings AB, a public corporation formed under the laws of Sweden; EQT AB (discussed above); and Investor Growth Capital Holding B.V., a limited liability company formed under the laws of Netherlands. Investor AB (p. 6, Exh. B) and Investor Investments Holding AB, are both corporations organized under the laws of Sweden, and both hold an indirect 34.56% calculated voting interest in Tampnet Inc.

EQT International Holdings B.V. (p. 8, Exh. B), a limited liability company organized under the laws of the Netherlands, holds an indirect 81% calculated voting interest in Tampnet Inc. and is a wholly owned subsidiary of EQT Holdings Coöperatief W.A. EQT International Holdings B.V. is managed and controlled by the non-member managers (Directors) listed on page 8 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 more than a 5% interest in Tampnet Inc. The shareholders/members of EQT Holdings Coöperatief W.A. are insulated (as described in the certification attached as Exhibit D). EQT Holdings Coöperatief W.A. is managed and controlled by CM Capital B.V., a limited liability company organized under the

⁵Publicly available information confirms that no other non-U.S. shareholder of Investor AB holds, directly or indirectly, through one or more intervening entities, 10% or more of the equity interests and/or voting interests, or a controlling interest, in Investor AB. See <http://www.investorab.com/investors-media/share-information/ownership-structure/> (last visited Mar. 10, 2016).

laws of the Netherlands. EQT HC Holdings I B.V., a limited liability company organized under the laws of the Netherlands holds a 5% voting interest in Tampnet Inc.

CBTJ Financial Services B.V. (p. 9, Exh. B), a limited liability company organized under the laws of the Netherlands, owns 100% of EQT V Verwaltung GmbH. The shareholders/members of CBTJ Financial Services B.V. are insulated (as described in the certification attached as Exhibit D).

Additional indirect ownership interests in Tampnet Inc. are held through SEP Holdings, B.V.; EQT Holdings Cooperatief W.A.; and, CBTJ Financial Services B.V. Eighteen individuals, through various personal holding companies, hold disclosable indirect voting interests in Tampnet Inc. through these three entities (hereafter the “Feeder Entities”). These individuals and their disclosable (indirect voting) interests are set forth on pp. 10-14 of Exh. B.

2. Control of Tampnet Inc.

Tampnet Inc. is, and will continue to be, controlled by its Board of Directors and company officers, who are responsible for the management and oversee the day-to-day operations of the company. The board of Tampnet Inc.’s parent company, Tampnet AS, will also exercise indirect control over Tampnet Inc. through the Tampnet AS Board of Director’s power to appoint members of the Tampnet Inc. Board of Directors.

The individuals and entities with disclosable interests in Tampnet Inc., the Disclosable Interest Holders, as identified on the attached ownership diagram, do not exert control over the management or operations of Tampnet Inc. These Disclosable Interest Holders do have the right to appoint Board members of the intermediary entities through which they hold their indirect interests in Tampnet Inc., and as such have “controlling” interests in Tampnet Inc. to the extent reflected by their indirect voting interests as shown in Exhibit B. Thus, the Disclosable Interest

Holders with a 10%, or greater, interest can and do exert control through their ability to vote (consistent with their interests) on the selection, approval and removal of the Board members of the various intermediary entities with interests in Tampnet Inc.

However, none of the Disclosable Interest Holders, other than Mr. Karl Heinz Horrер,⁶ hold indirect voting interests in Tampnet Inc. greater than 49.99%. Notably, none of these individuals holds any equity interest, direct or indirect, in Tampnet Inc. Thus, other than Mr. Horrер, none of these persons have *de facto* control of Tampnet Inc. Additionally, none of these persons have entered into a voting agreement to act together for the purpose of acquiring, holding, voting, or disposing of their interests in (or otherwise controlling, as described above) Tampnet Inc., or any of its subsidiaries.

Further, none of these persons exert control over Tampnet Inc. in a manner that would establish that they have *de jure* control under the Commission's traditional analytical framework.⁷ First, none of these Disclosable Interest Holders have unfettered use of the licenses held by Tampnet Inc. (nor will they have unfettered use of the license to be acquired). Second, the Disclosable Interest Holders do not control daily operations of Tampnet Inc. As noted above, the officers and directors of Tampnet Inc. are responsible for the daily operations of the company, and they operate under a duty to act in the best interests of the company as a whole.⁸

Third, policy decisions are made by the officers and directors of Tampnet Inc., and the

⁶Under the FCC's attribution rules Mr. Karl Heinz Horrер is deemed to hold a 100% indirect voting interest in Tampnet Inc. by virtue of his role as Director of EQT V Verwaltung GmbH. However, Mr. Horrер is not directly involved in the management or operations of Tampnet Inc. and exercises no control over the operations of the company. Further, the organization to which Mr. Horrер serves as a Director, EQT V Verwaltung GmbH, has no authority to take part in the management or control of EQT Infrastructure Limited, or Tampnet Inc. (or any of its subsidiaries). Thus, Mr. Horrер and EQT V Verwaltung GmbH are effectively insulated from exerting any control over Tampnet Inc. or any of its subsidiaries.

⁷See *Applications of Intermountain Microwave*, 24 Rad Reg. (P&F) 983 (1963); *In Re Application of Ellis Thompson Corp.*, 10 F.C.C. Rcd. 12554 (1995).

⁸Indeed, many of the organizational documents for the legal entities that constitute the Disclosable Interest Holders specifically limit the authority of the limited partners, or non-manager LLC members, from having any role in the control or operations of the respective partnership or LLC (and, by extension, Tampnet Inc.).

Disclosable Interest Holders have no role in such decisions. Fourth, officers and directors of Tampnet Inc. are responsible for employment, supervision and dismissal of personnel, and the Disclosable Interest Holders have no role in such decisions. Fifth, officers and directors of Tampnet Inc. are responsible for the payment of financing obligations, including expenses arising out of operations, and the Disclosable Interest Holders have no role in such matters. Sixth, the Disclosable Interest Holders do not directly receive moneys and profits from the operation of facilities. Thus, under the Commission's own precedent, the Disclosable Interest Holders do not have any of the indicia of control that would establish that they exert *de jure* control over Tampnet Inc. Accordingly, the interests held by the Disclosable Interests Holders are non-controlling interests.

The organizational documents for the three Feeder Entities through which these disclosable interests are held,⁹ do not contain language that explicitly insulates such interest holders from taking such action. However, representatives from each of the three feeder entities have certified that notwithstanding any provision of each entity's articles of association, or any other agreement, no foreign shareholder (i.e., non-U.S. citizen or entity not organized under the laws of the United States) of the entity is, or will be, engaged in active involvement in the management or operation of the Company or Tampnet Inc., or any of its subsidiaries. Representatives of the feeder entities have certified to the accuracy of these facts in the attached Exhibit D (Insulation Certifications).

Finally, the Knut and Alice Wallenberg Foundation (the "Foundation") hold a non-controlling, indirect 14.58% voting (but no equity) interest in Tampnet Inc. Petitioners have undertaken a diligent effort to discern how the Foundation is controlled. The purpose of the Foundation is to "promote scientific research and teaching and study activities ..." for the

⁹The three "feeder" entities are CBTJ Financial Services, B.V., SEP Holdings B.V., and EQT Cooperatief W.A.

national benefit. Under Swedish law, specifically the Foundation Act (1994:1220), the board or administrator of a Swedish foundation is responsible for ensuring the provisions of the foundation's deeds are following, and unless otherwise stated, are responsible for the investment of the foundation's assets. Publicly available information establishes that while day to day activities of the Foundation are the responsibility of the Executive Director, the Board of Directors has the "ultimate responsibility" for management of the Foundation. The Foundation's Board Members are disclosed on the Foundation's website.¹⁰

III. GRANT OF THIS PETITION IS IN THE PUBLIC INTEREST

The public interest will be served by the Commission issuing a declaratory ruling approving the indirect foreign ownership of Tampnet Licensee. The Commission has recognized that foreign investment has been and will continue to be an important source of financing for U.S. telecommunications companies, fostering technical innovation, economic growth, and job creation.¹¹ For more than a decade, the Commission has consistently permitted non-U.S. individuals and entities to hold up to 100 percent of the equity and voting power in holders of FCC licenses subject to Section 310(b)(4) of the Act.¹²

Moreover, there is no basis to conclude that the potential foreign ownership of the Licenses, after conversion from private carrier to common carrier, will harm competition in the Gulf of Mexico area. No adverse circumstances exist with respect to the proposed transaction. Operation of the Licenses on a common carrier basis (and attendant foreign ownership) will not

¹⁰See <https://www.wallenberg.com/kaw/en/foundation/board-directors> (last visited Mar. 9, 2016).

¹¹See *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 at 5744 (2013) ("2013 Foreign Ownership Order").

¹²See, e.g., *Intelsat, Ltd., Transferor, and Zeus Holdings Ltd., Transferee*, 19 FCC Rcd 24820 (2004); *Applications of Comsat General Corporation*, 19 FCC Rcd 21216 (2004); *Voicestream Wireless Corporation*, 16 FCC Rcd 9779 (2001).

pose any national security or law enforcement issues or concerns. Nor will conversion of the Licenses (and attendant foreign ownership) result in any increased concentration in any market for telecommunications services in the United States, and will not otherwise result in a foreign carrier being able to exercise market power to favor a U.S. affiliate.

In fact, grant of the petition for declaratory ruling will affirmatively advance the public's interest and increase competition as it will provide Tampnet greater operational flexibility to market its services on a common carrier basis, and thereby reach additional customers. That, in turn, will further strengthen Tampnet's ability to provide a variety of innovative wireless products and services in the Gulf of Mexico to serve the unique needs of customers in that area. For example, Tampnet's parent, Tampnet AS, has introduced an offshore 4G LTE network in the North Sea to provide mobile and rotating rigs and vessels reliable communication links, even in rough weather. Tampnet is planning to introduce a similar LTE network in the Gulf of Mexico. This will benefit users in the Gulf of Mexico because LTE has lower latency and higher capacity compared to the existing infrastructure, which will promote the safety of operations in the area. Additionally, the licenses are already indirectly held by Tampnet AS and there will be no change in ownership.

Thus, issuance of the requested declaratory ruling will allow Tampnet to continue to be a positive force in the Gulf of Mexico wireless marketplace, to the benefit of the public.

IV. CONCLUSION

For the reasons set forth herein, Tampnet respectfully requests that the Commission issue a declaratory ruling that the public interest will be served by authorizing 100 percent indirect foreign ownership structure for Tampnet Licensee and all of Tampnet's subsidiaries and affiliates, whether currently existing or subsequently formed or acquired.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'KC Halm', is enclosed in a rectangular box.

KC Halm
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Washington, DC 20006
(202) 973-4200
kchalm@dwt.com
richardgibbs@dwt.com

Counsel for Tampnet Inc.

Date: March 11, 2016

EXHIBITS

Exhibit A Certification of Carl Sjolund

Exhibit B Ownership Structure

Exhibit C Entities and Individuals Seeking Specific Approval

Exhibit D Insulation Certifications

EXHIBIT A

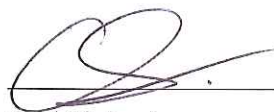
Certification of Carl Sjolund

Certification

I, Carl Sjolund, do hereby certify under penalty of perjury under the laws of the United States of America that:

1. I am a Director of EQT Partners AB and am authorized to submit this certification on behalf of the petitioner;
2. I have read the foregoing Petition for Declaratory Ruling ("Petition") and am generally familiar with its contents;
3. With respect to statements made in the Petition, 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).*

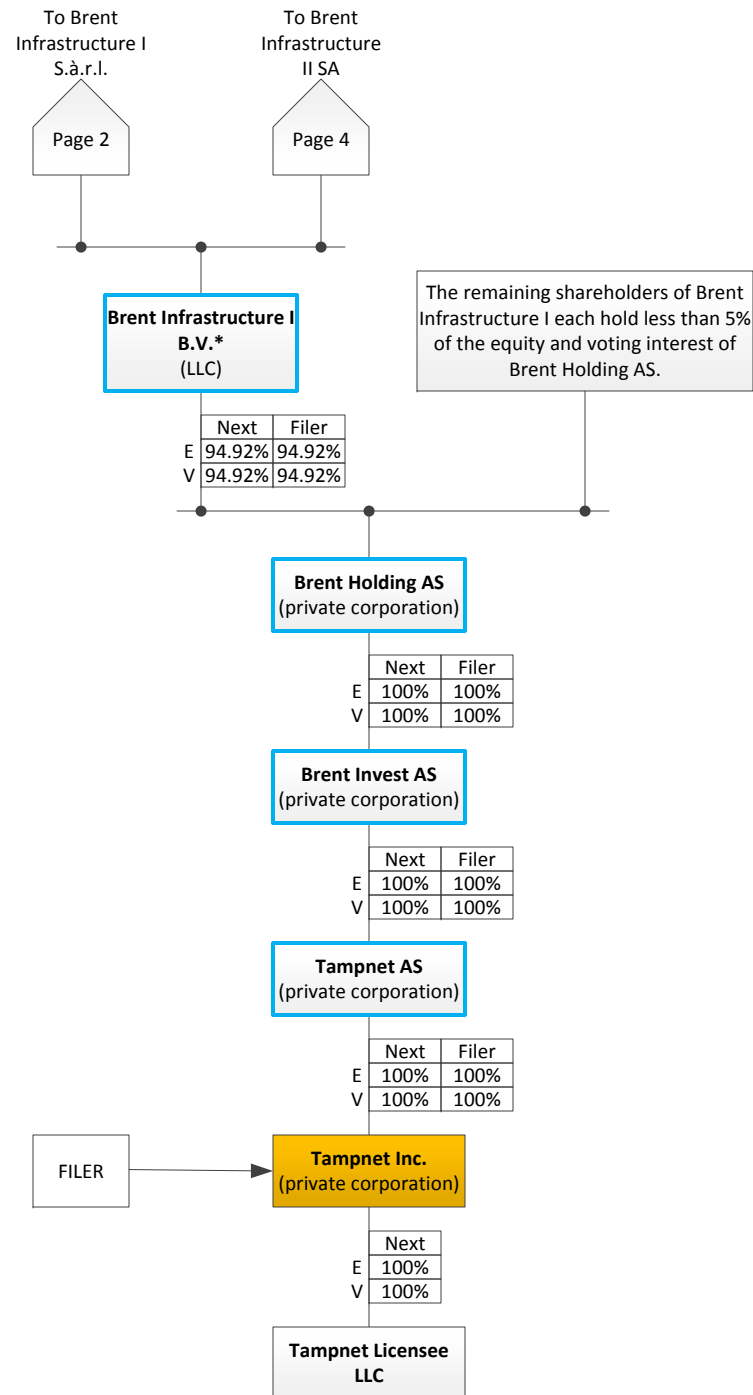
Executed on March 11, 2016



Carl Sjolund

EXHIBIT B

Ownership Structure

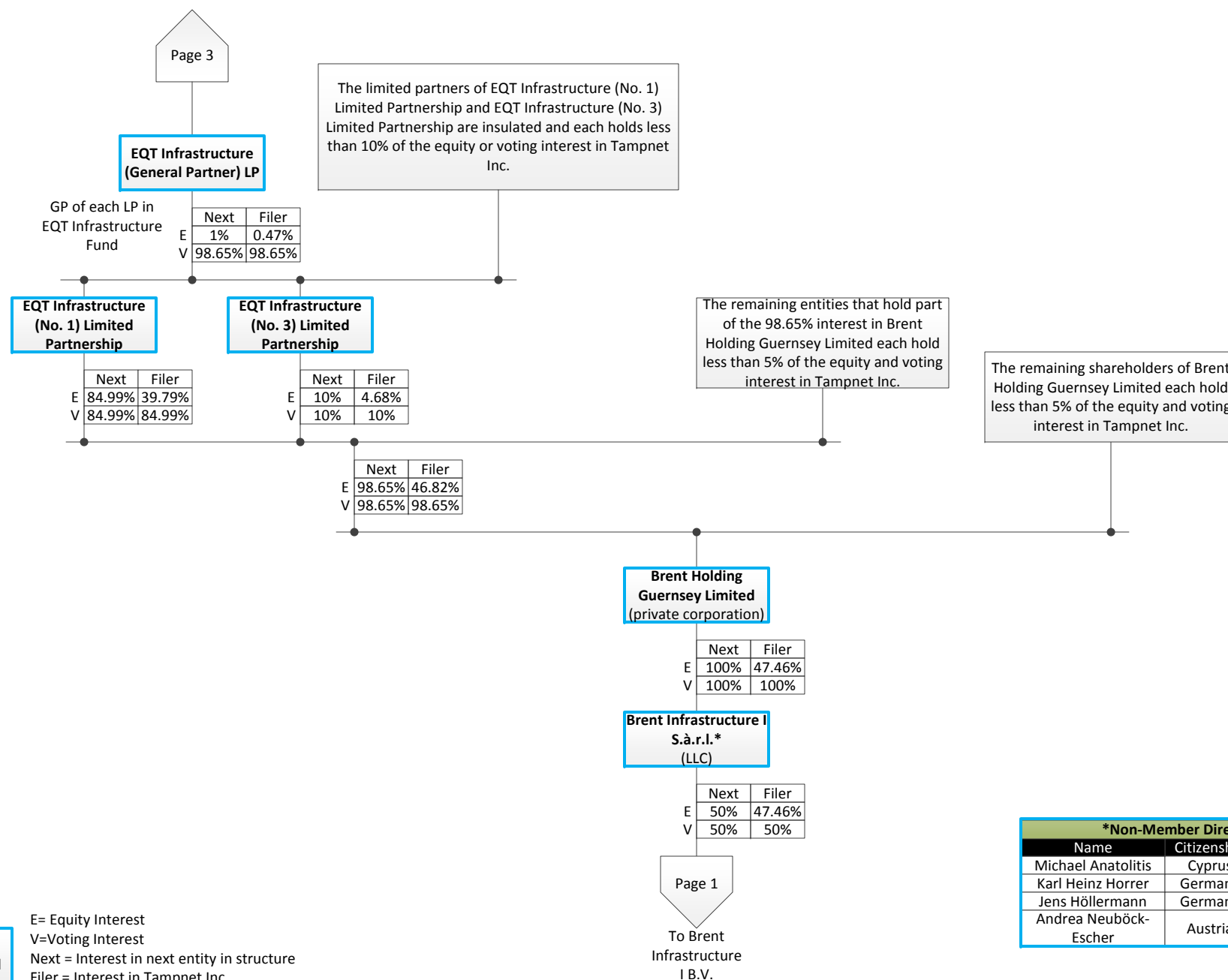


Specific Approval
Entity or Individual

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

*Non-member Directors		
Name	Citizenship	Business
Peter Veldman	Netherlands	Individual
James Arrol	UK	Individual
Martijn Sibren van der Schaaf	Netherlands	Individual

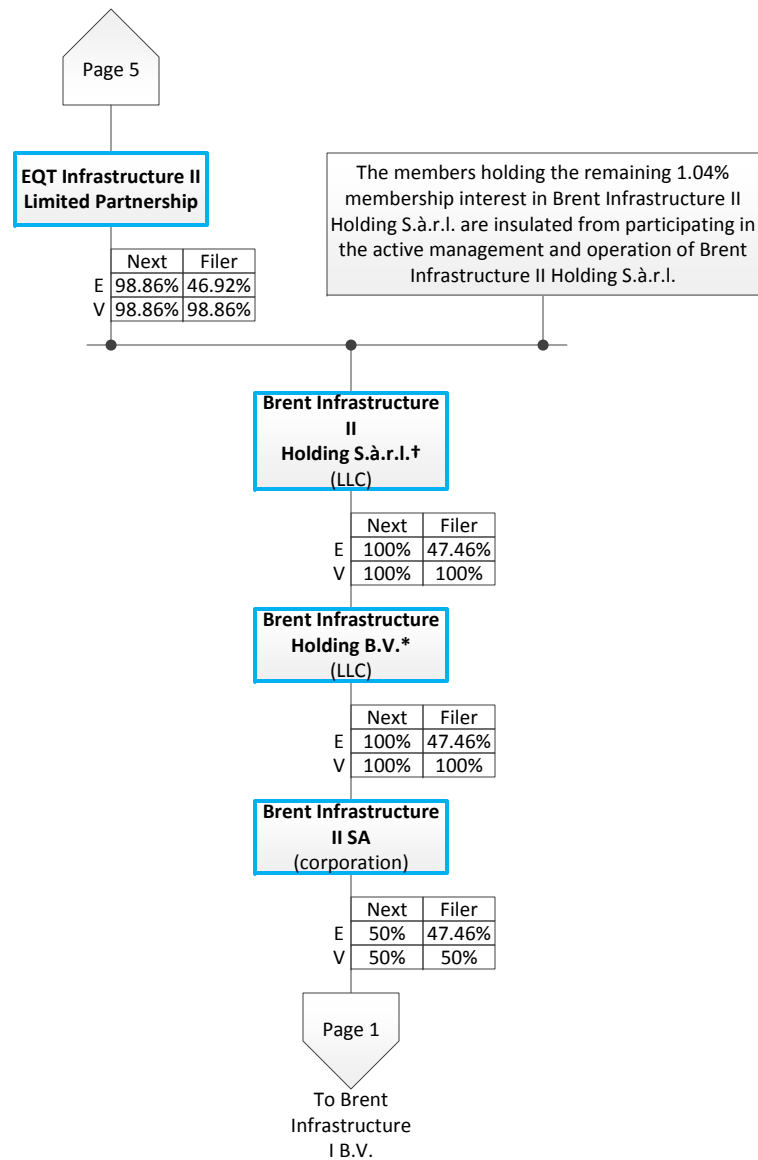
Mar. 10, 2016



Specific Approval
Entity or Individual



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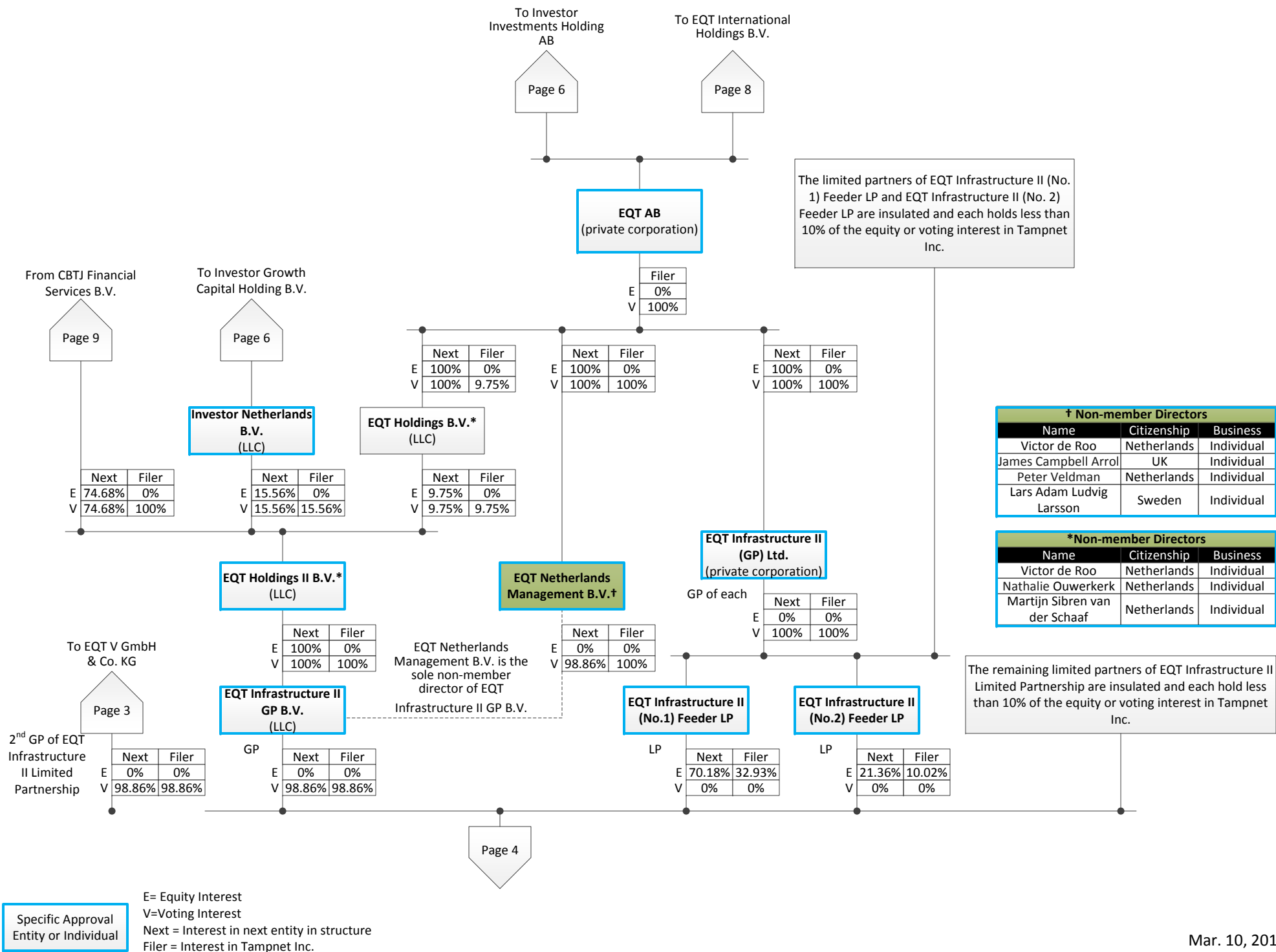


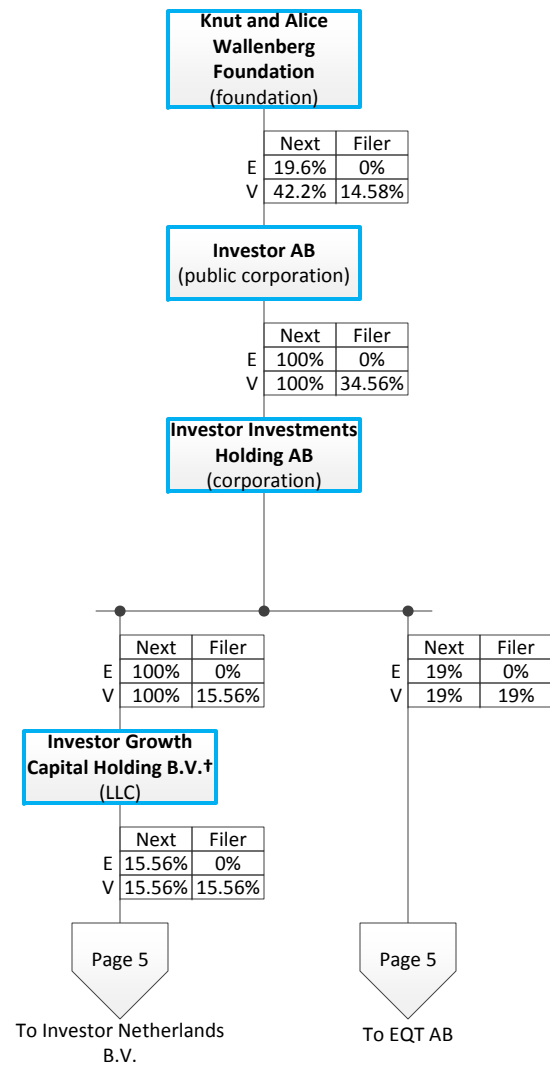
Specific Approval
Entity or Individual

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

† Non-member Directors		
Name	Citizenship	Business
Michael Anatolitis	Cyprus	Individual
Karl Heinz Horrer	Germany	Individual
Jens Höllermann	Germany	Individual
Andrea Neuböck-Escher	Austria	Individual

*Non-member Directors		
Name	Citizenship	Business
Peter Veldman	Netherlands	Individual
Victor de Roo	Netherlands	Individual

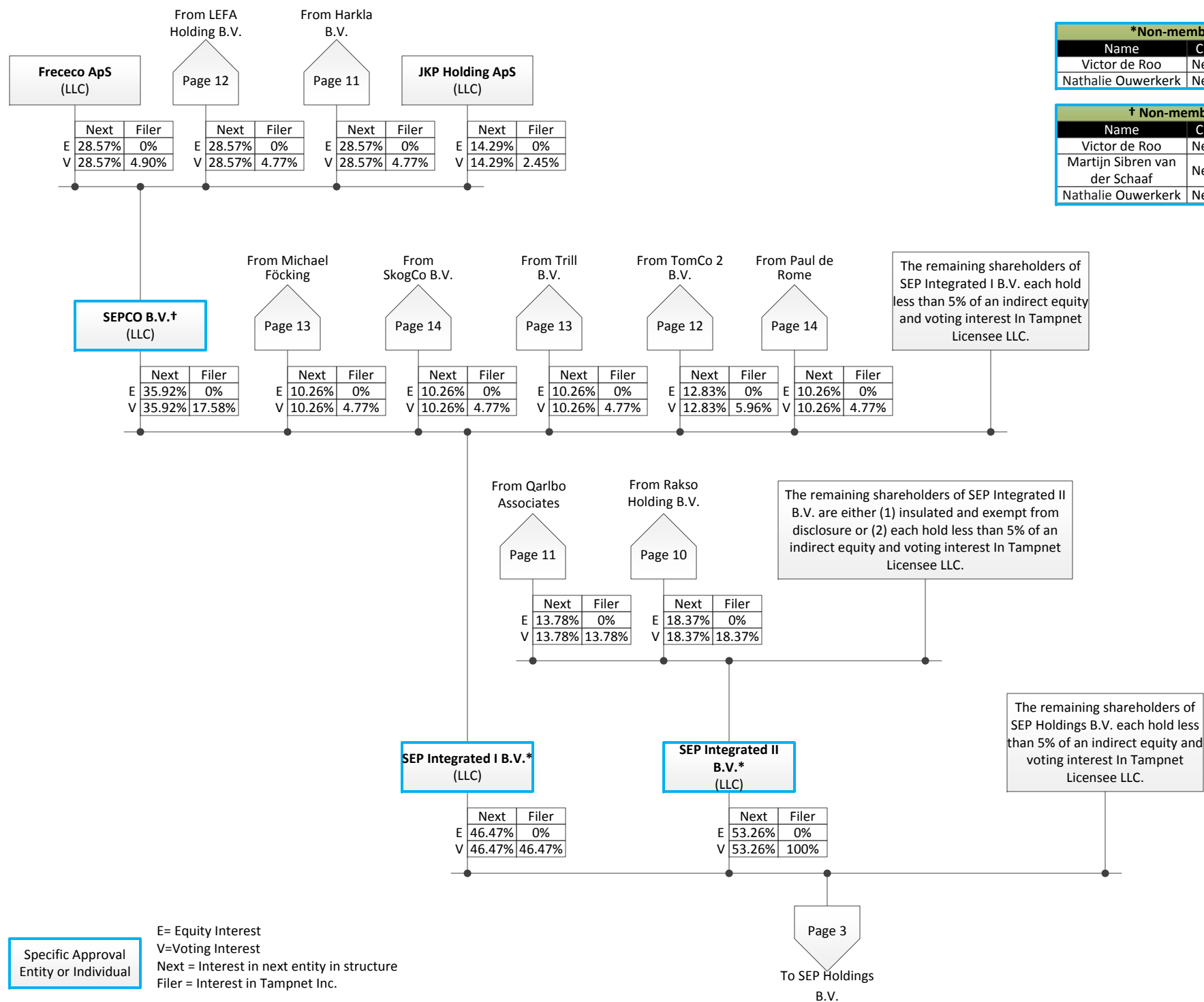




† Non-member Directors		
Name	Citizenship	Business
Marcus Jacobus Maria Hollander	Netherlands	Individual
Andreas Georg Christiaan Demmel	German	Individual
Robert de Heus	Netherlands	Individual
Petra Hedengran	Sweden	Individual
Anders Eckerwall	Sweden	Individual

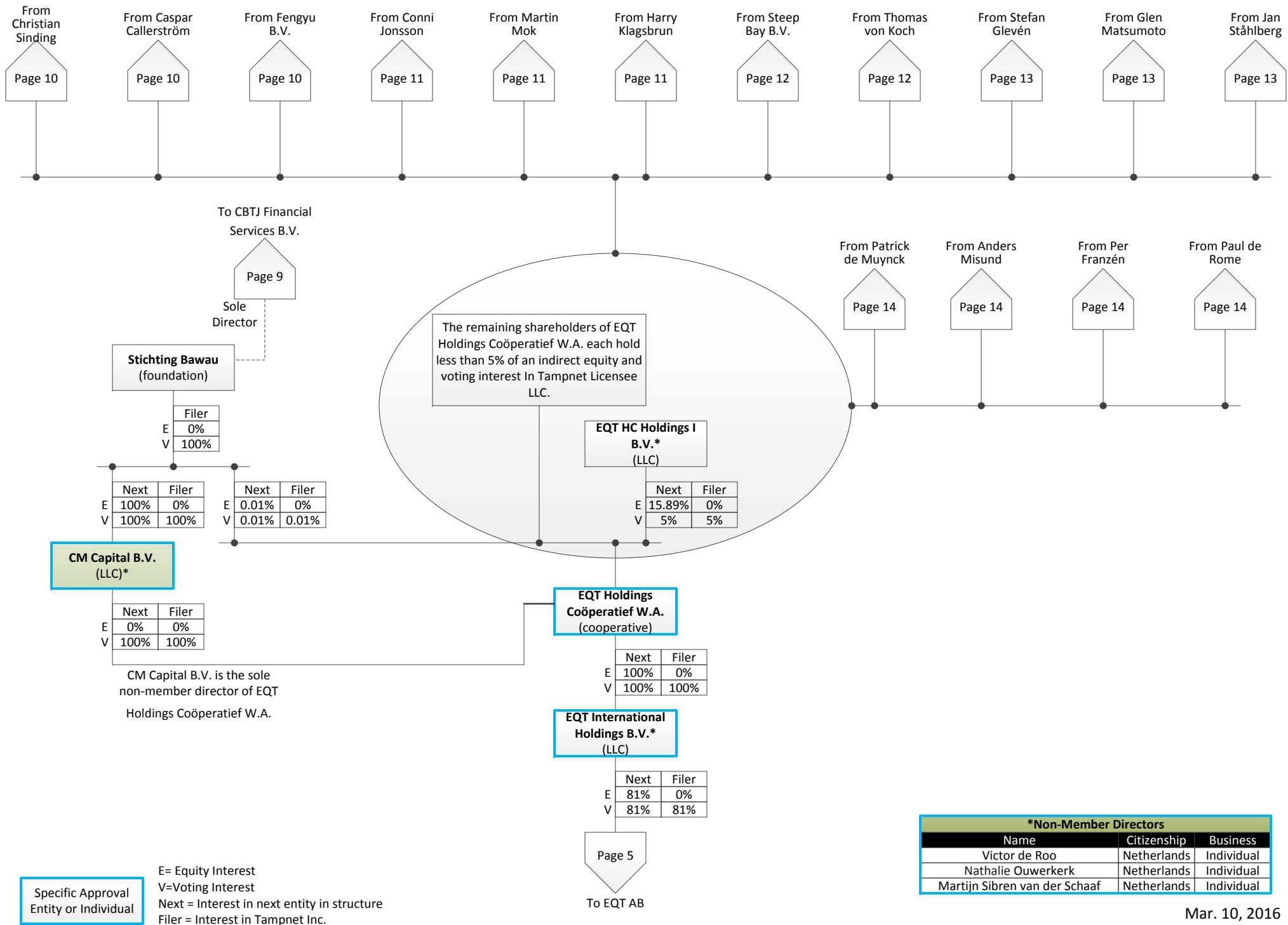
Specific Approval
Entity or Individual

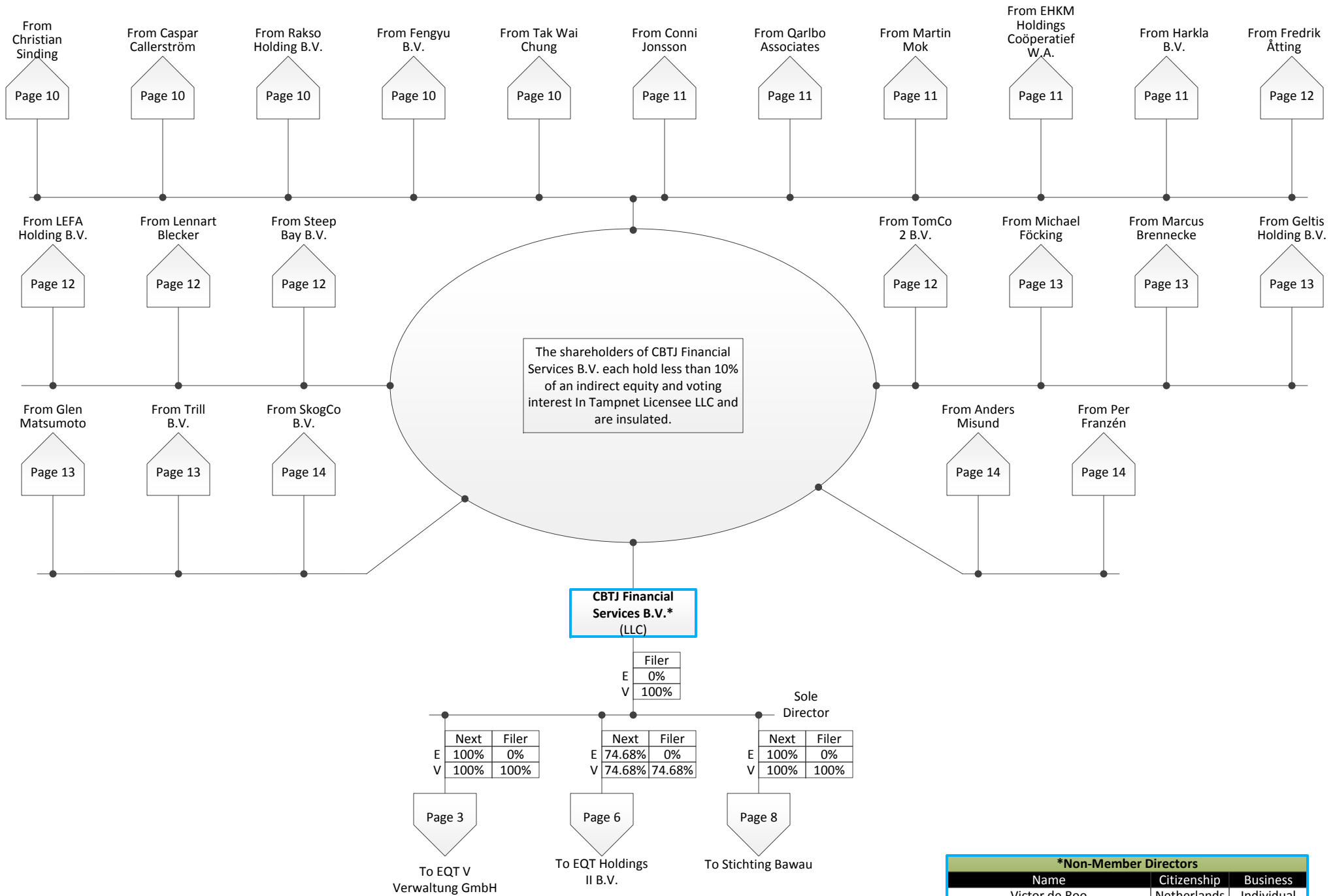
E= Equity Interest
V=Voting Interest
Next = Interest in next entity in structure
Filer = Interest in Tampnet Inc.



*Non-member Directors		
Name	Citizenship	Business
Victor de Roo	Netherlands	Individual
Nathalie Ouwerkerk	Netherlands	Individual

† Non-member Directors		
Name	Citizenship	Business
Victor de Roo	Netherlands	Individual
Martijn Sibren van der Schaaf	Netherlands	Individual
Nathalie Ouwerkerk	Netherlands	Individual





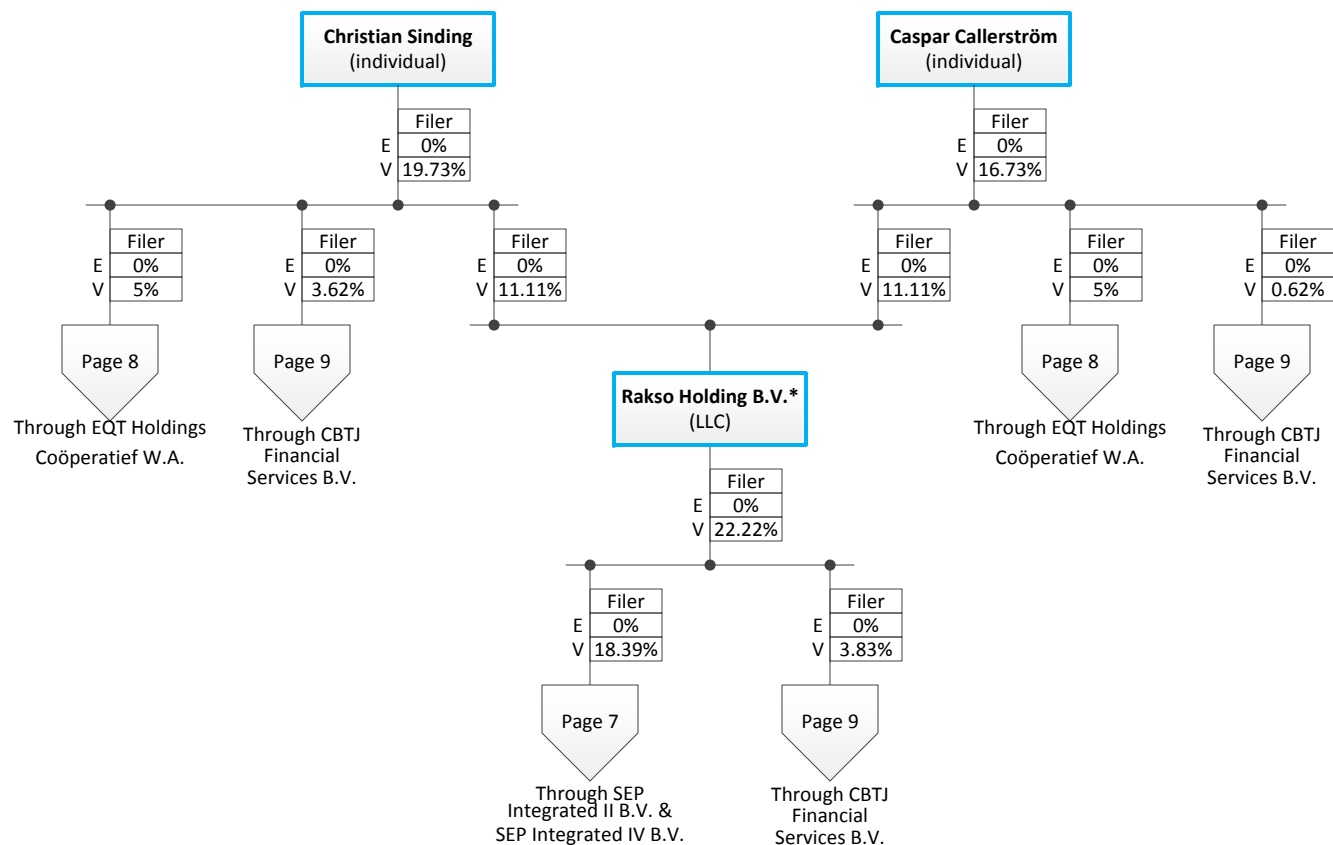
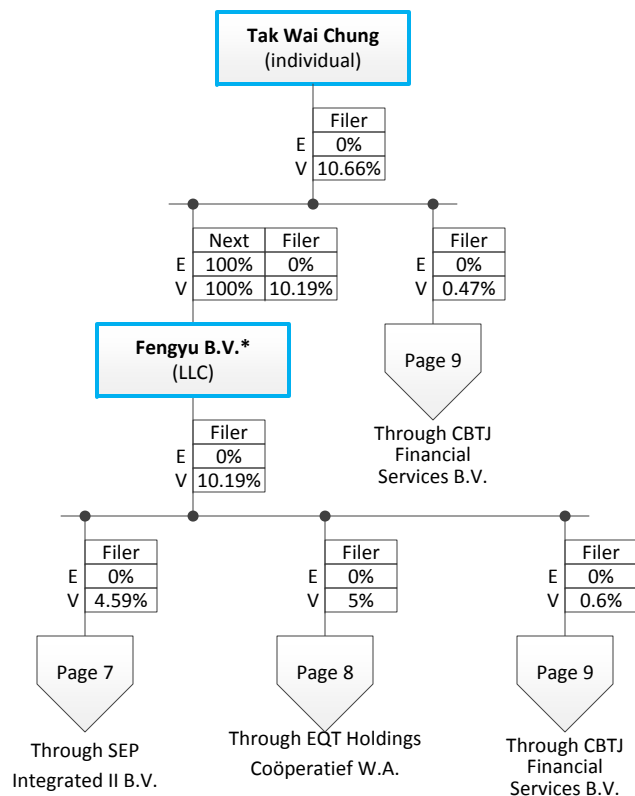
Specific Approval
Entity or Individual

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

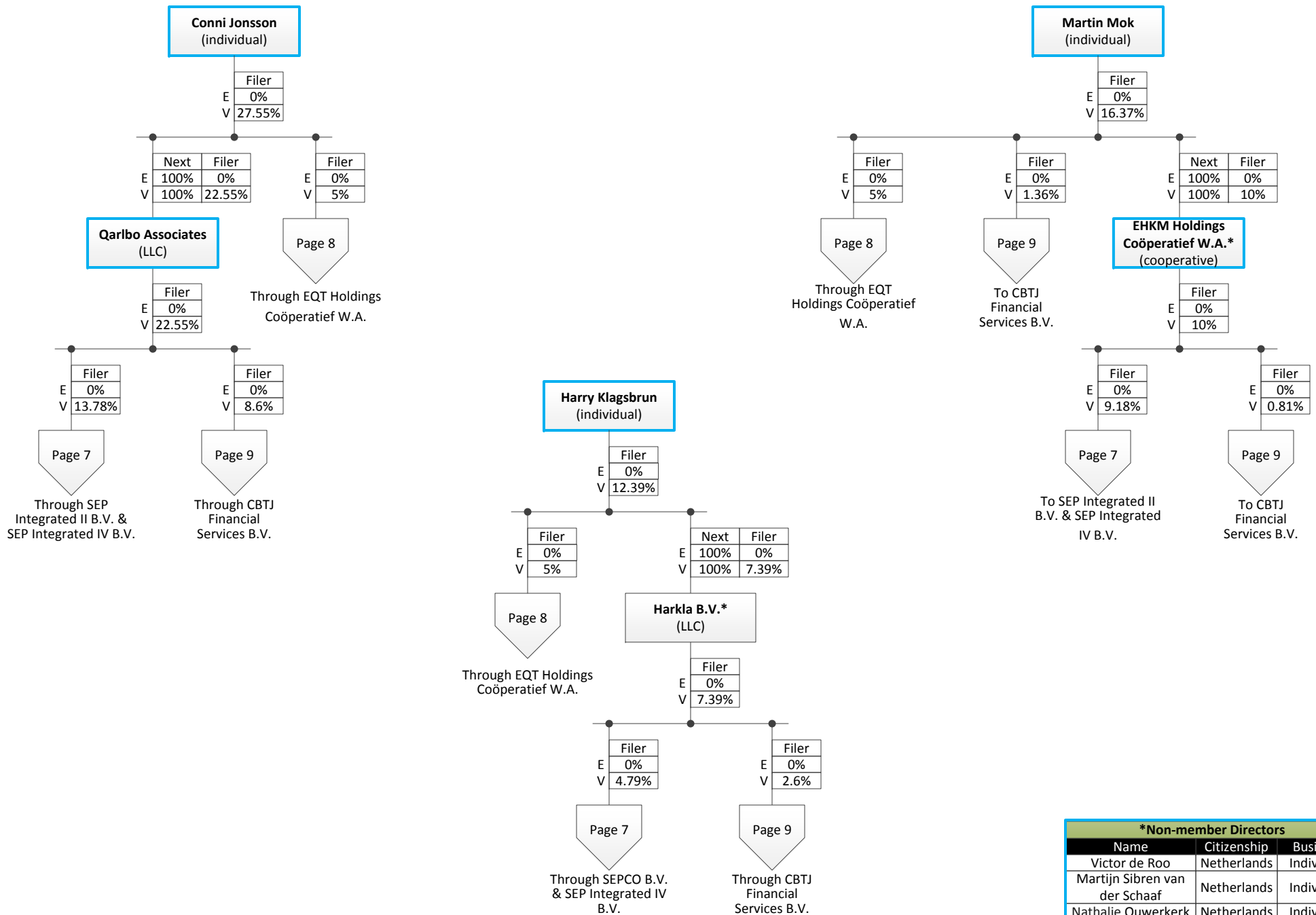
*Non-Member Directors		
Name	Citizenship	Business
Victor de Roo	Netherlands	Individual
Nathalie Ouwerkerk	Netherlands	Individual
Martijn Sibren van der Schaaf	Netherlands	Individual

Specific Approval
Entity or Individual

E= Equity Interest
V=Voting Interest
Next = Interest in next entity in structure
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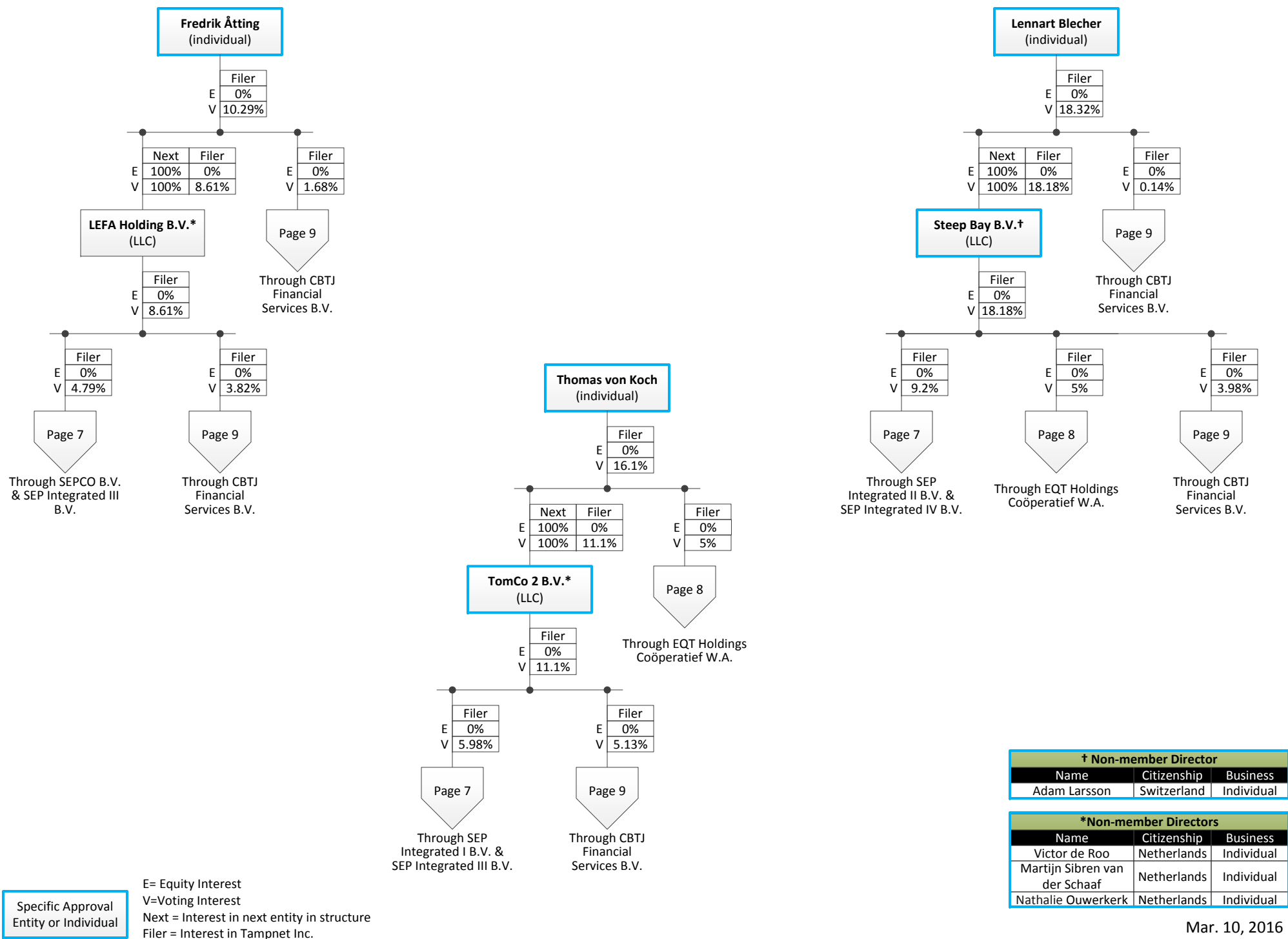
*Non-member Directors		
Name	Citizenship	Business
Victor de Roo	Netherlands	Individual
Martijn Sibren van der Schaaf	Netherlands	Individual
Nathalie Ouwkerk	Netherlands	Individual

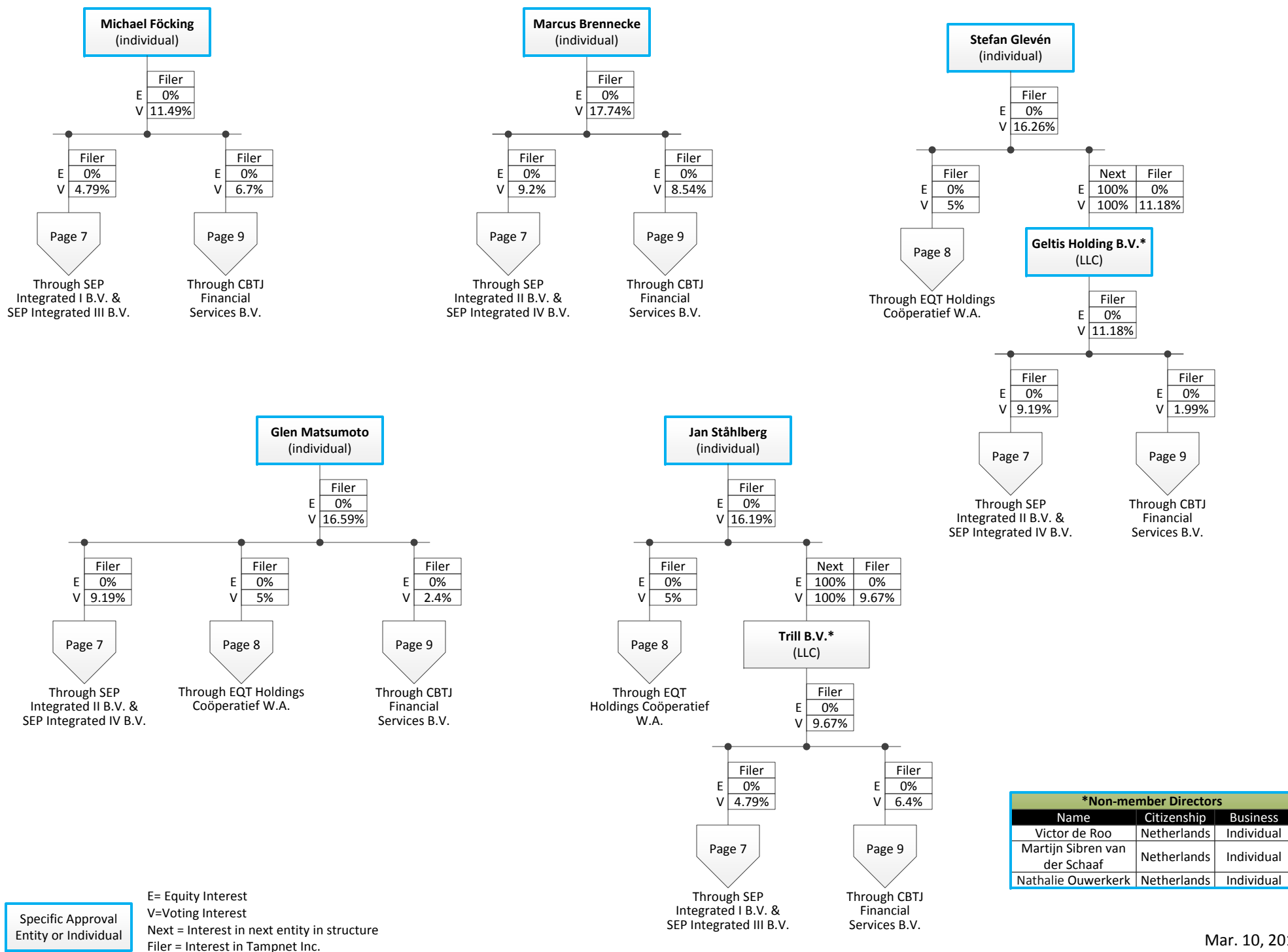


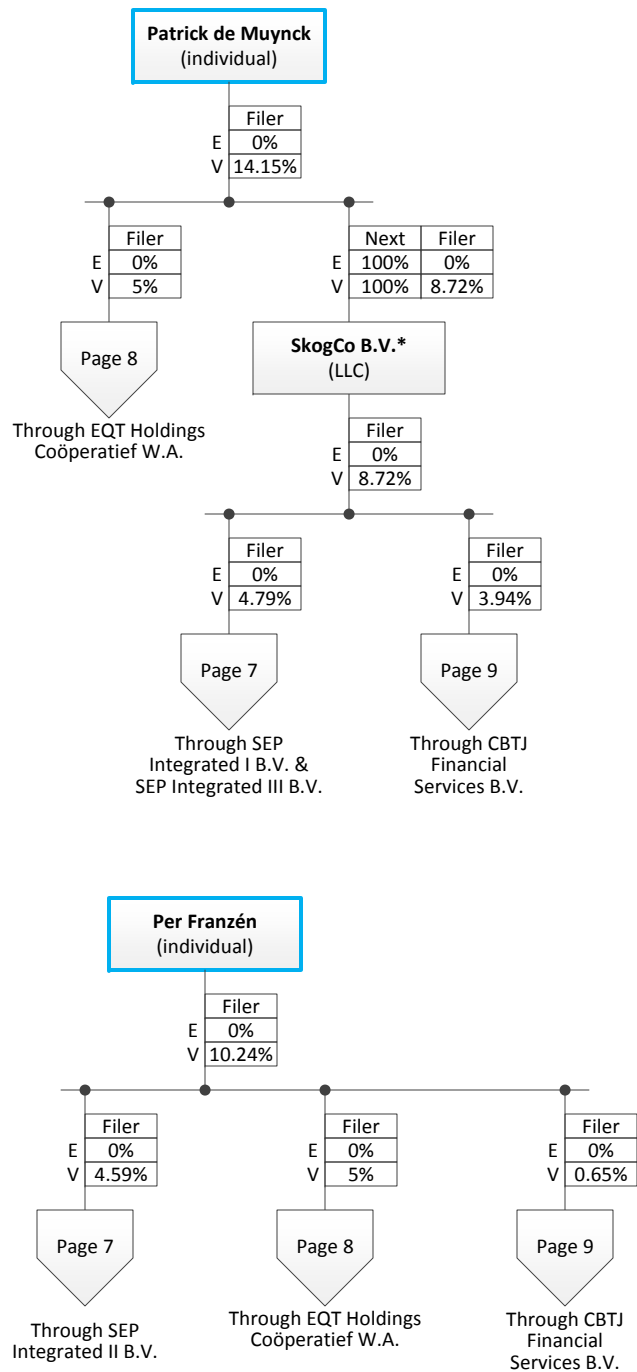
Specific Approval
Entity or Individual

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

*Non-member Directors		
Name	Citizenship	Business
Victor de Roo	Netherlands	Individual
Martijn Sibren van der Schaaf	Netherlands	Individual
Nathalie Ouwerkerk	Netherlands	Individual

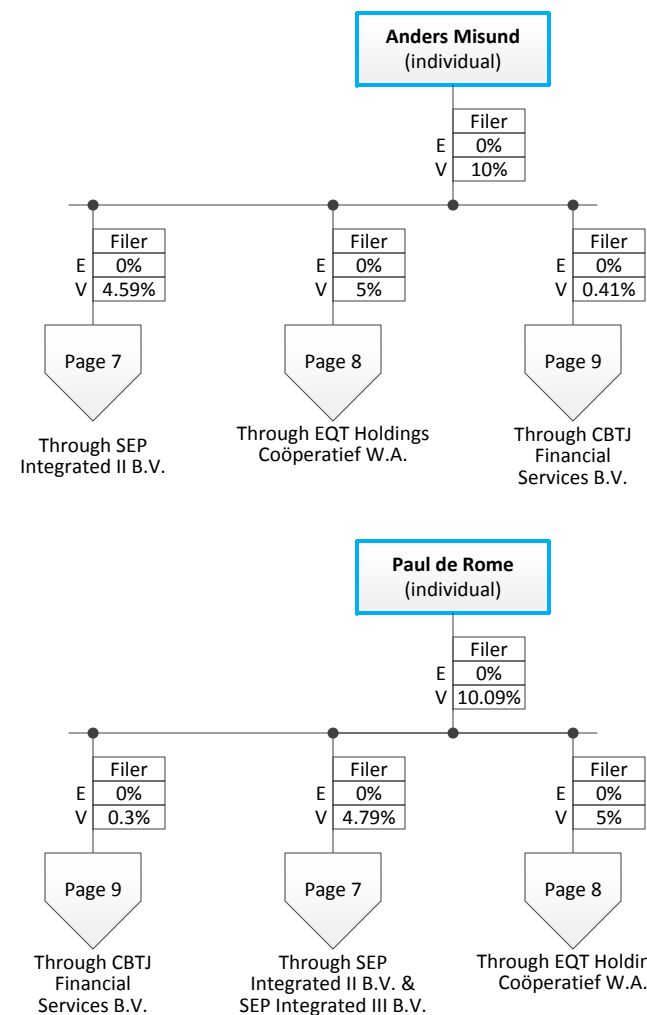






E= Equity Interest
V=Voting Interest
Next = Interest in next entity in structure
Filer = Interest in Tampnet Inc.

Specific Approval
Entity or Individual



*Non-member Directors		
Name	Citizenship	Business
Victor de Roo	Netherlands	Individual
Martijn Sibren van der Schaaf	Netherlands	Individual
Nathalie Ouwkerk	Netherlands	Individual

EXHIBIT C

Entities and Individuals Seeking Specific Approval

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 Integrated I B.V.	Netherlands	Limited Liability Corp.	Investment
18. SEP Integrated II B.V.	Netherlands	Limited Liability Corp.	Investment
19. SEPCO B.V.	Netherlands	Limited Liability Corp.	Investment
20. Glen Matsumoto	U.S.	Individual	N/A
21. Steep Bay B.V.	Netherlands	Limited Liability Corp.	Investment
22. Geltis Holding B.V.	Netherlands	Limited Liability Corp.	Investment
23. Stefan Glevén	Sweden	Individual	N/A
24. Conni Jonsson	Sweden	Individual	N/A
25. Qarlbo Associates	Luxembourg	Limited Liability Corp.	Investment
26. Victor de Roo	Netherlands	Individual	N/A
27. Nathalie Ouwerkerk	Netherlands	Individual	N/A
28. Martjin Sibrenvan der Schaaf	Netherlands	Individual	N/A
29. Rakso Holding B.V.	Netherlands	Limited Liability Corp.	Investment
30. Christian Sinding	Norwegian	Individual	N/A
31. Caspar Callerstrom	Swedish	Individual	N/A
32. Brent Infrastructure II SA	Luxembourg	Corporation	Investment
33. Brent Infrastructure Holding B.V.	Netherlands	Limited Liability Corp.	Investment
34. Peter Veldman	Netherlands	Individual	N/A
35. Brent Infrastructure II Holding S.à.r.l	Luxembourg	Limited Liability Corp.	Investment
36. Michael Anatolis	Cyprus	Individual	N/A
37. Karl Heinz Horrer	Germany	Individual	N/A

38. Jens Hollermann	Germany	Individual	N/A
39. Andrea Neubock-Escher	Austria	Individual	N/A
40. EQT Infrastructure II Limited Partnership	Netherlands	Limited Partnership	Investment
41. EQT Infrastructure II GP B.V.	Netherlands	Limited Liability Corp.	Investment
42. EQT Infrastructure II (No. 1) Feeder LP	U.K.	Limited Partnership	Investment
43. EQT Infrastructure II (No. 2) Feeder LP	U.K.	Limited Partnership	Investment
44. EQT Holdings II B.V.	Netherlands	Limited Liability Corp.	Investment
45. EQT Infrastructure II (GP) Ltd.	U.K.	Private Corp.	Investment
46. EQT Netherlands Management B.V.	Netherlands	Limited Liability Corp.	Investment
47. EQT AB	Sweden	Corporation	Investment
48. James Campbell Arrol	U.K.	Individual	N/A
49. Lars Adam Ludvig Larsson	Sweden	Individual	N/A
50. Investor Investments Holding AB	Sweden	Corporation	Investment
51. EQT International Holdings B.V.	Netherlands	Limited Liability Corp.	Investment
52. EQT Holdings Cooperatief W.A.	Netherlands	Cooperative	Investment
53. Investor Growth Capital Holding B.V.	Netherlands	Limited Liability Corp.	Investment
54. Investor Investments Holding AB	Sweden	Corporation	Investment
55. Investor AB	Sweden	Corporation	Investment
56. Investor Netherlands B.V.	Netherlands	Limited Liability Corp.	Investment
57. Knut and Alice Wallenberg Foundation	Sweden	Foundation	Research
58. Marcus Jacobus Maria Hollander	Netherlands	Individual	N/A
59. Andreas Georg Christiaan Demmel	German	Individual	N/A
60. Robert de Heus	Netherlands	Individual	N/A
61. Petra Hedengran	Sweden	Individual	N/A
62. Anders Eckerwall	Sweden	Individual	N/A
63. Fredrik Åtting	Sweden	Individual	N/A
64. Harry Klagsbrun	Sweden	Individual	N/A
65. Michael Föcking	Germany	Individual	N/A
66. Paul de Rome	U.K.	Individual	N/A
67. Patrick de Muynck	Belgium	Individual	N/A
68. Jan Ståhlberg	Sweden	Individual	N/A
69. Thomas von Koch	Sweden	Individual	N/A
70. Marcus Brennecke	Germany	Individual	N/A
71. TomCo 2 B.V.	Netherlands	Limited Liability Corp.	Investment
72. Martin Mok	Hong Kong S.A.R.	Individual	N/A
73. EHKM Holdings Coöperatief U.A.	Netherlands	Cooperative	Investment
74. Lennart Blecher	Sweden	Individual	N/A
75. Fengyu B.V.	Netherlands	Limited Liability Corp.	Investment
76. Tak Wai Chung	British National (Overseas)	Individual	N/A
77. Anders Misund	Norway	Individual	N/A
78. Per Franzén	Sweden	Individual	N/A
79. CM Capital B.V.	Netherlands	Limited Liability Corp.	Investment

EXHIBIT D

Insulation Certifications

Certification CBTJ Financial Services B.V.

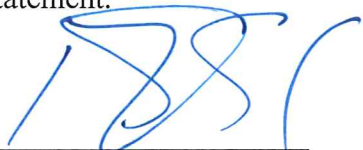
Each of the undersigned:

1. Martijn Sibren van der Schaaf; and
2. Victor Alexander de Roo,

in their capacity as members of the board of directors ("Non-member Directors") of CBTJ Financial Services B.V. (the **Company**), states as follows:

1. I am a member of the board of directors of the Company, I am therefore authorized to make this statement on behalf of the Company, which is identified as a Disclosable Interest Holder of Tampnet Inc. (as set forth in the Tampnet Petition for Declaratory Ruling Supplement dated 11 March 2016).
2. The facts stated in the Tampnet Petition for Declaratory Ruling Supplement dated 11 March 2016, with respect to the Company are true and correct on the date of this statement.
3. Notwithstanding any provision of the Company's articles of association, or any other agreement, no foreign shareholder (*i.e.*, non-U.S. citizen or entity not organized under the laws of the United States) of the Company will be engaged in active involvement in the management or operation of the Company or Tampnet Inc., or any of its subsidiaries.
4. The foregoing reflects my knowledge and belief on the date of this statement based upon reasonable inquiry with the Company and its subsidiaries.

I declare under penalty of perjury that the foregoing is true and correct on the date of this statement.



M.S. van der Schaaf



V.A. de Roo

Executed on 10 March 2016

Certification SEP Holdings B.V.

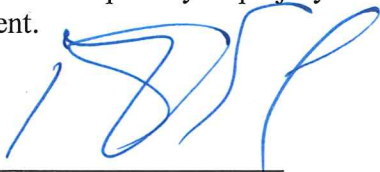
Each of the undersigned:

1. Martijn Sibren van der Schaaf; and
2. Victor Alexander de Roo,

in their capacity as members of the board of directors ("Non-member Directors") of SEP Holdings B.V. (the **Company**), states as follows:

1. I am a member of the board of directors of the Company, I am therefore authorized to make this statement on behalf of the Company, which is identified as a Disclosable Interest Holder of Tampnet Inc. (as set forth in the Tampnet Petition for Declaratory Ruling Supplement dated 11 March 2016).
2. The facts stated in the Tampnet Petition for Declaratory Ruling Supplement dated 11 March 2016, with respect to the Company are true and correct on the date of this statement.
3. Notwithstanding any provision of the Company's articles of association, or any other agreement, no foreign shareholder (*i.e.*, non-U.S. citizen or entity not organized under the laws of the United States) of the Company ^{15, 92} will be engaged in active involvement in the management or operation of the Company or Tampnet Inc., or any of its subsidiaries.
4. The foregoing reflects my knowledge and belief on the date of this statement based upon reasonable inquiry with the Company and its subsidiaries.

I declare under penalty of perjury that the foregoing is true and correct on the date of this statement.



M.S. van der Schaaf



V.A. de Roo

Executed on 10 March 2016

Certification EQT Holdings Coöperatief W.A.

Each of the undersigned:

1. Martijn Sibren van der Schaaf; and
2. Victor Alexander de Roo,


in their capacity as members of the board of directors ("Non-member Directors") of CM Capital B.V., which is the sole member of the board of directors ("Non-member Director") of EQT Holdings Coöperatief W.A. (the **Cooperative**), states as follows:

1. I am a member of the board of directors of CM Capital B.V., which is the sole member of the board of directors the Cooperative, I am therefore authorized to make this statement on behalf of the Cooperative, which is identified as a Disclosable Interest Holder of Tampnet Inc. (as set forth in the Tampnet Petition for Declaratory Ruling Supplement dated 11 March 2016).
2. The facts stated in the Tampnet Petition for Declaratory Ruling Supplement dated 11 March 2016, with respect to the Cooperative are true and correct on the date of this statement.
3. Notwithstanding any provision of the Cooperative's articles of association, or any other agreement, no foreign holder (*i.e.*, non-U.S. citizen or entity not organized under the laws of the United States) of interests in the Cooperative *is, or* will be engaged in active involvement in the management or operation of the Cooperative or Tampnet Inc., or any of its subsidiaries.
4. The foregoing reflects my knowledge and belief on the date of this statement based upon reasonable inquiry with the Cooperative and its subsidiaries.

I declare under penalty of perjury that the foregoing is true and correct on the date of this statement.



M.S. van der Schaaf



V.A. de Roo

Executed on 10 March 2016