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June 15, 2016

#### **VIA IBFS**

Ms. Marlene Dortch Secretary Federal Communications Commission 445 12<sup>th</sup> 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 in support of the relief requested in Tampnet's pending Petition for Declaratory Ruling ("PDR") in the above-referenced proceeding. Specifically, this filing includes the following revised and new materials intended to replace or supplement the following portions of the pending PDR:

- Revised pages 3, 6, 7, 9, 11, 12 and exhibit cover page of the PDR, intended to replace the original pages in the pending PDR
- Revised Exhibit B (ownership diagram), intended to replace existing Exhibit B
- Revised Exhibit C-1 (specific approval list) intended to replace existing Exhibit C
- New Exhibit C-2 (inherited voting interest for all non-member manager directors) intended to supplement revised Exhibit C-1
- Revised Exhibit D (insulation certifications) intended to replace existing certification forms in existing Exhibit D
- New Exhibit E (intermediary entities not disclosed on ownership diagram) intended as a new exhibit

Please refer to these supplemental pages as necessary. Thank you for your assistance with this matter. Please contact me for any additional questions that may arise.

Ms. Marlene Dortch Federal Communications Commission June 15, 2016

Sincerely,

/s/ K.C. Halm
K.C. Halm
Richard Gibbs
Davis Wright Tremaine LLP
1919 Pennsylvania Ave., NW, Suite 800
Washington, DC 20006
(202) 973-4200
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Counsel to Tampnet Inc.

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

## B. Legal Counsel

K.C. Halm Richard A. Gibbs Davis Wright Tremaine LLP 1919 Pennsylvania Ave. NW Suite 800 Washington, DC 20006 Tel: (202) 973-4200

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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 common carrier cellular and AWS licenses from Broadpoint.<sup>4</sup>

## 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(b), 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. 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.

<sup>&</sup>lt;sup>4</sup> See supra, n. 1.

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 Integrated III B.V. and SEP Integrated IV B.V. are not identified on the ownership chart, Exhibit B, although certain disclosable interest holders hold their interests through these entities.) 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

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 disclosable 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

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 42.2% calculated voting interest in Tampnet Inc. through the following entities: Investor AB,<sup>5</sup> 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 100% 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 100% 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

<sup>&</sup>lt;sup>5</sup>Publicly 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* <a href="http://www.investorab.com/investors-media/share-information/ownership-structure/">http://www.investorab.com/investors-media/share-information/ownership-structure/</a> (last visited Mar. 10, 2016).

(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 Horrer, 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. Horrer, none of these persons have *de jure* 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 facto* control under the Commission's traditional analytical framework. 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. Third, policy decisions are made by the officers and directors of Tampnet Inc., and the Disclosable Interest Holders have no role in such decisions. Fourth, officers and directors of

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<sup>&</sup>lt;sup>6</sup> Under the FCC's attribution rules Mr. Karl Heinz Horrer 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. Horrer 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. Horrer 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. Horrer and EQT V Verwaltung GmbH are effectively insulated from exerting any control over Tampnet Inc. or any of its subsidiaries.

<sup>&</sup>lt;sup>7</sup> See 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).

<sup>&</sup>lt;sup>8</sup> Indeed, 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-manger 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.

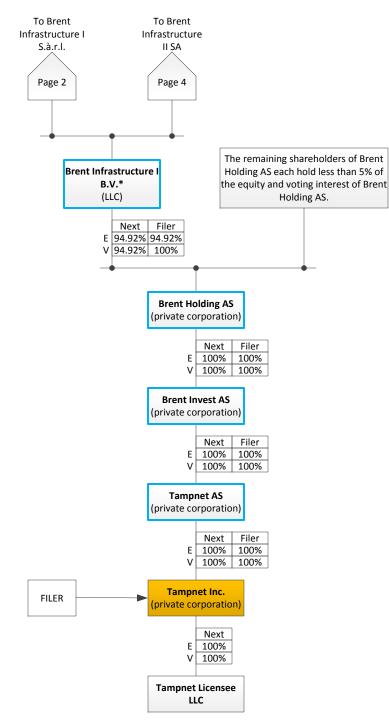
Representatives of the feeder entities have certified to the accuracy of these facts in the attached Exhibit D (Insulation Certifications).

Finally, the Knut and Alice Wallenberg Foundation (the "Foundation") hold a non-controlling, indirect 42.2% 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

<sup>&</sup>lt;sup>9</sup>The three "feeder" entities are CBTJ Financial Services, B.V., SEP Holdings B.V., and EQT Cooperatief W.A.

## **List of Exhibits**

Exhibit A	Certification of Carl Sjolund
Exhibit B	Ownership Structure
Exhibit C-1	Entities and Individuals Seeking Specific Approval
Exhibit C-2	Non-Member Managers' (Director) inherited Voting Interests
Exhibit D	Insulation Certifications
Exhibit E	Intermediary Entities Not Disclosed on Exhibit B (Ownership Structure



Specific Approval Entity or Individual

Next = Interest in next entity in structure Filer = Interest in Tampnet Inc. Note = Voting interests in the filer identified herein have been calculated in accordance with FCC rules (47 C.F.R. 1.992) and may not reflect the actual voting interest indirectly held in the filer.

E= Equity Interest

V=Voting Interest

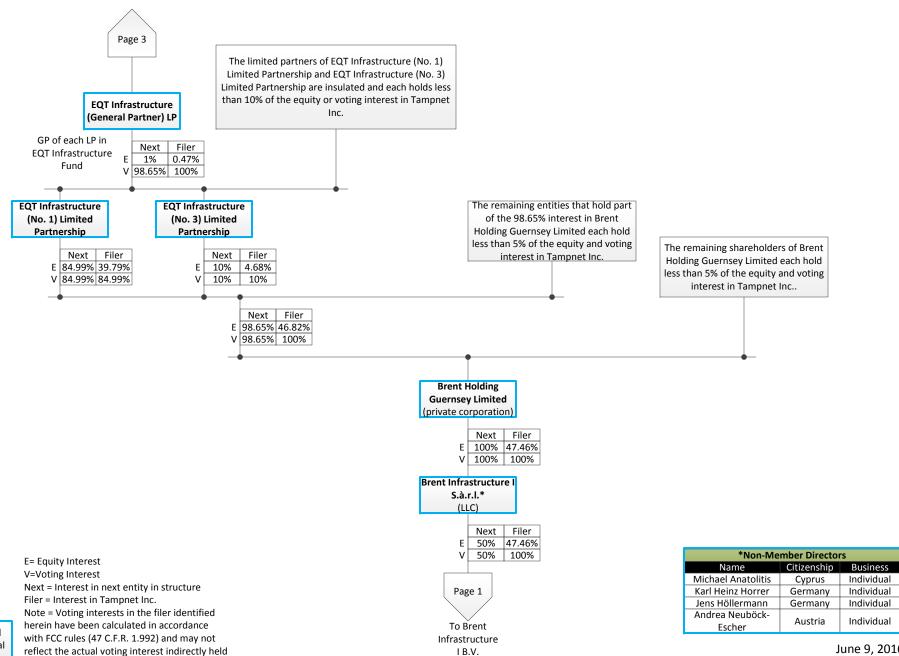
\*Non-member Directors

Name Citizenship Business

Peter Veldman Netherlands Individual

James Arrol UK Individual

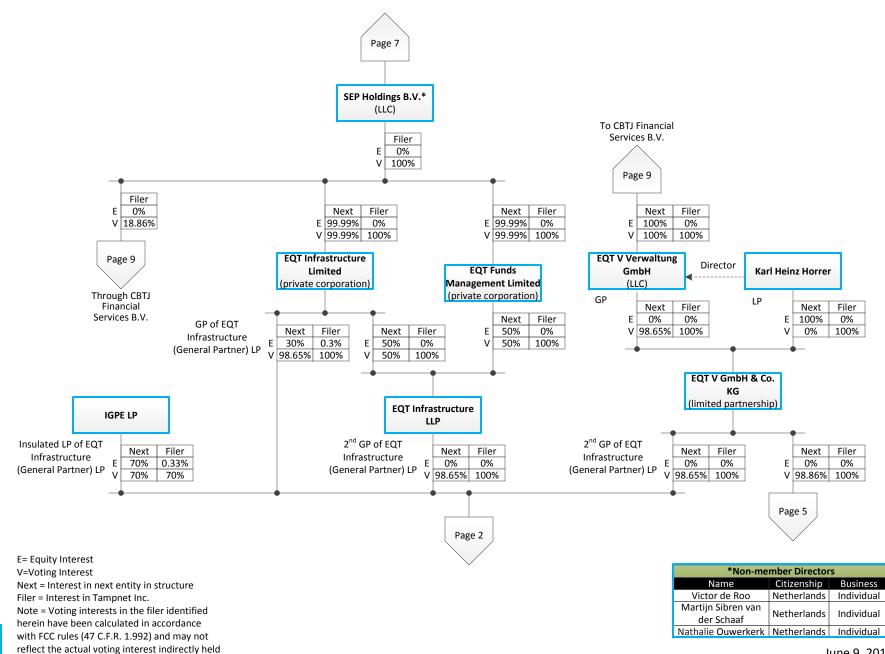
Martijn Sibren van der Schaaf Netherlands Individual



Specific Approval **Entity or Individual** 

in the filer.

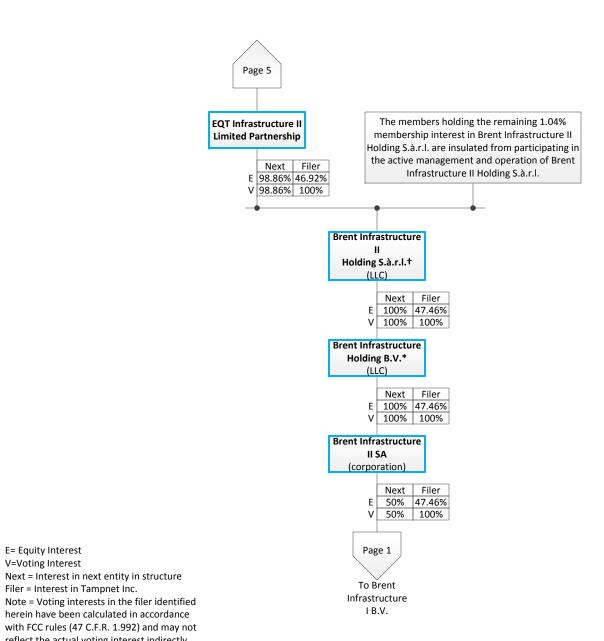
June 9, 2016



Specific Approval **Entity or Individual** 

in the filer.

June 9, 2016



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

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

Specific Approval **Entity or Individual**  E= Equity Interest

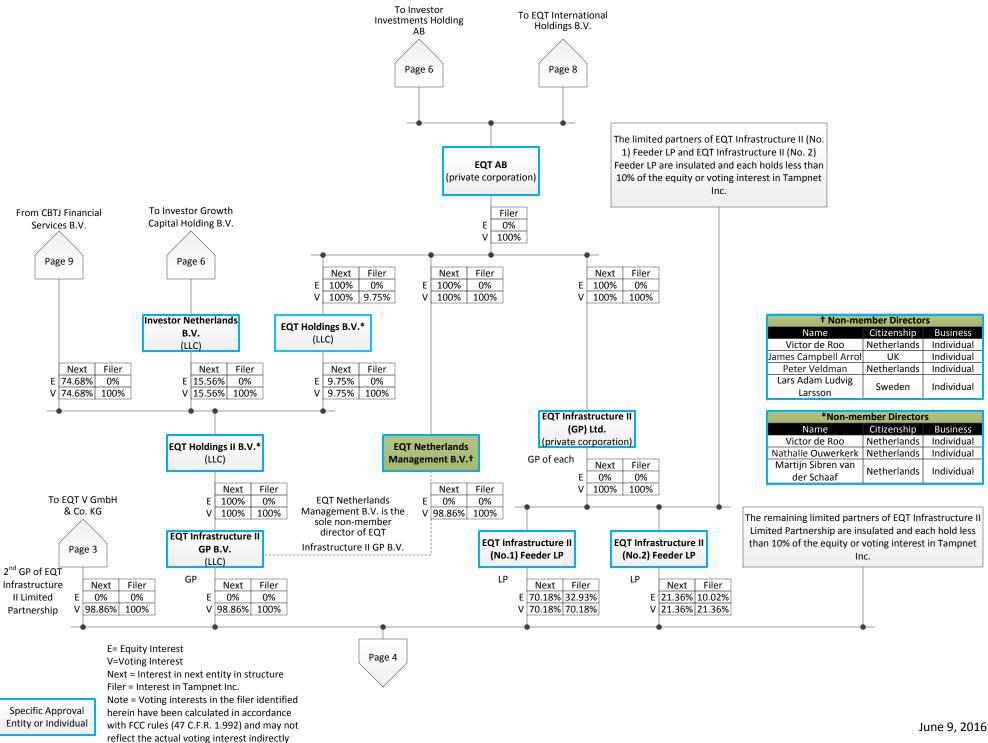
V=Voting Interest

held in the filer.

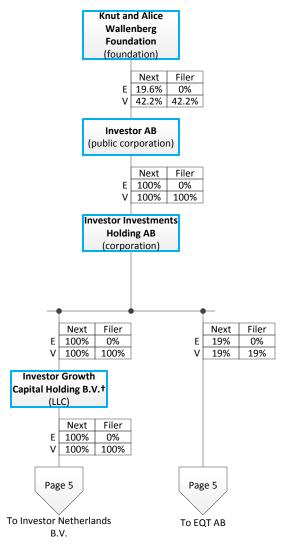
Next = Interest in next entity in structure

Filer = Interest in Tampnet Inc.

reflect the actual voting interest indirectly June 9, 2016



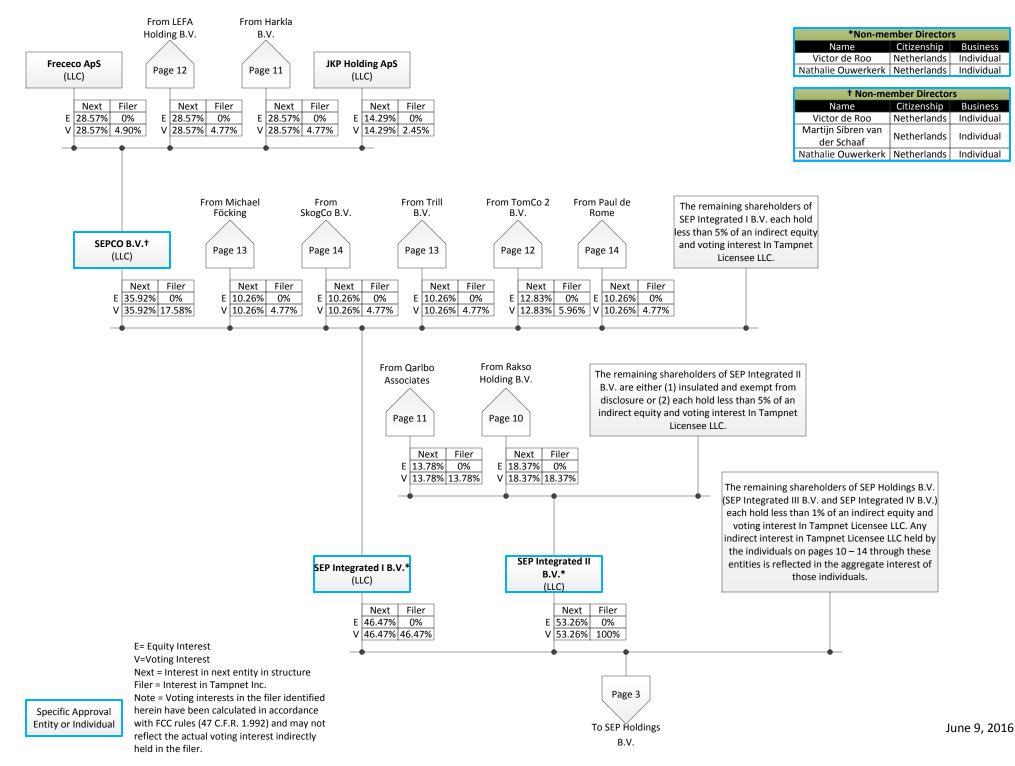
held in the filer.

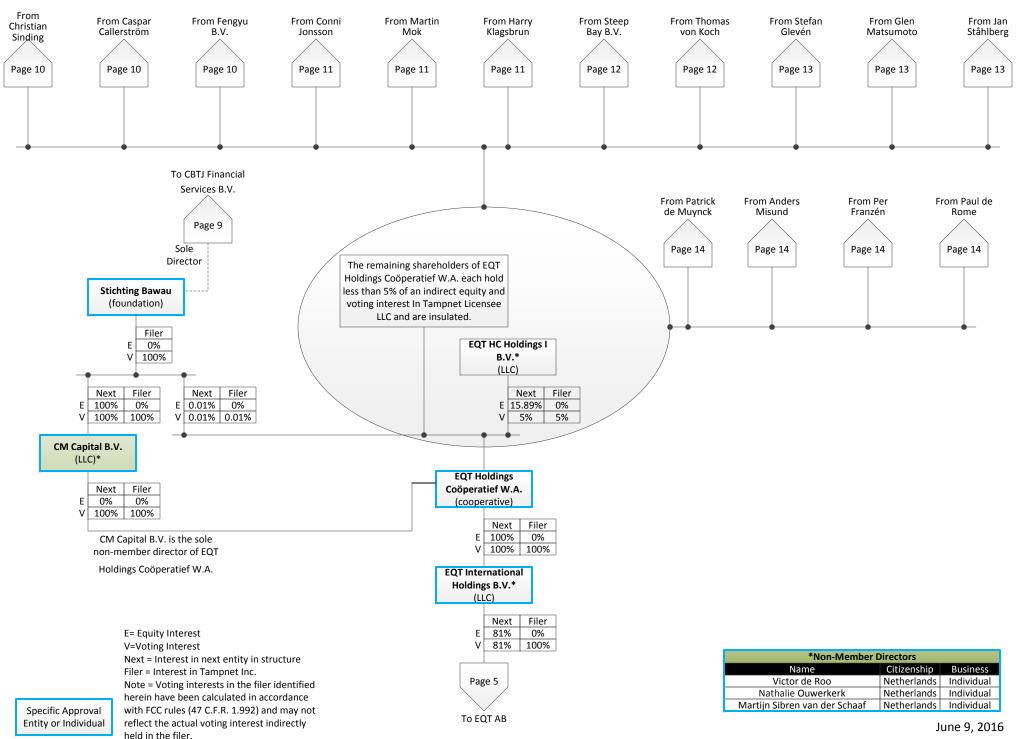


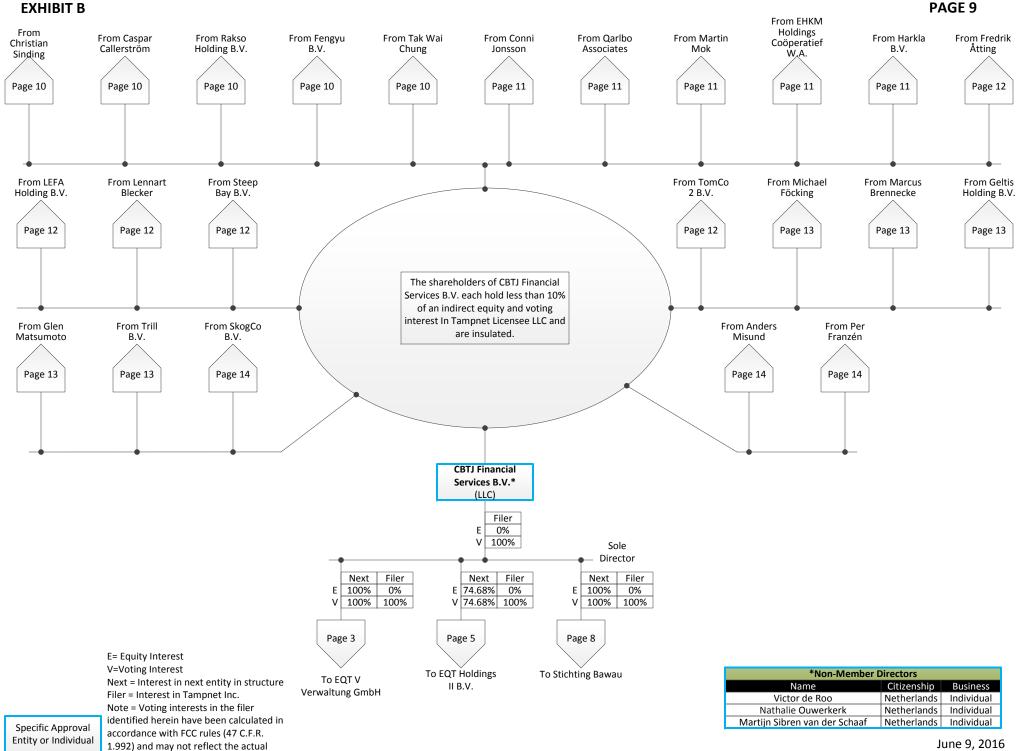
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V=Voting Interest
Next = Interest in next entity in structure
Filer = Interest in Tampnet Inc.
Note = Voting interests in the filer identified
herein have been calculated in accordance
with FCC rules (47 C.F.R. 1.992) and may not
reflect the actual voting interest indirectly

held in the filer.

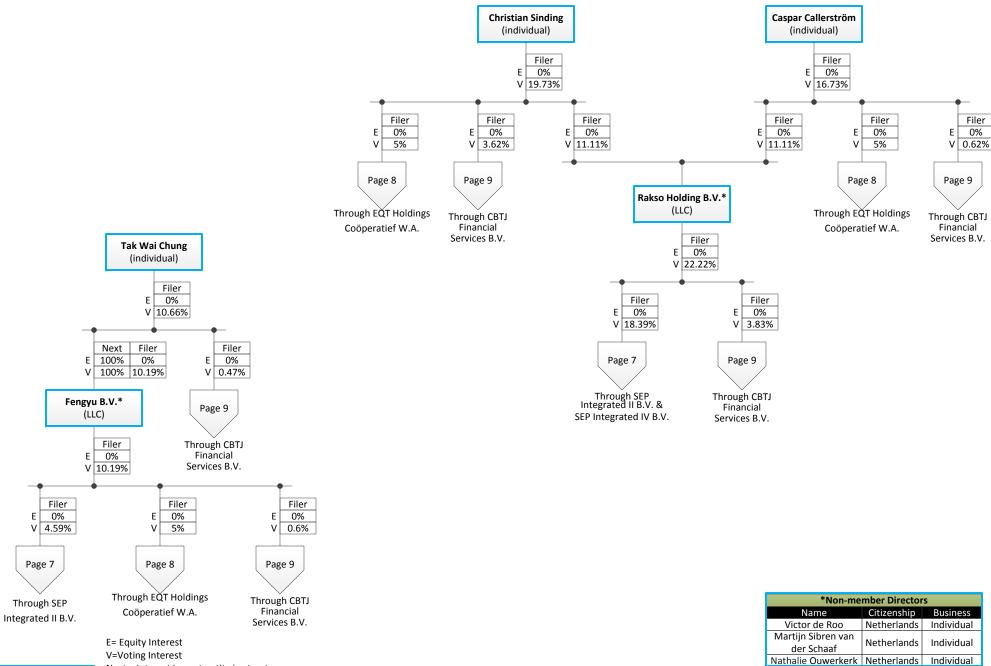
† Non-member Directors										
Name	Citizenship	Business								
Marcus Jacobus Maria Hollander	Netherlands	Individual								
Andreas Georg Christiaan Demmel	German	Individual								
Robert de Heus	Netherlands	Individual								
Petra Hedengran	Sweden	Individual								
Anders Eckerwall	Sweden	Individual								







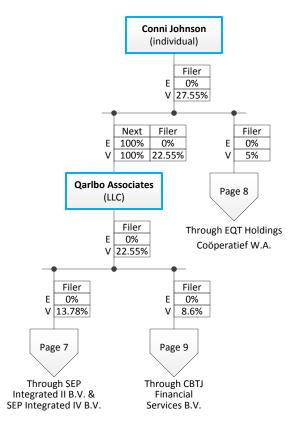
voting interest indirectly held in the filer.

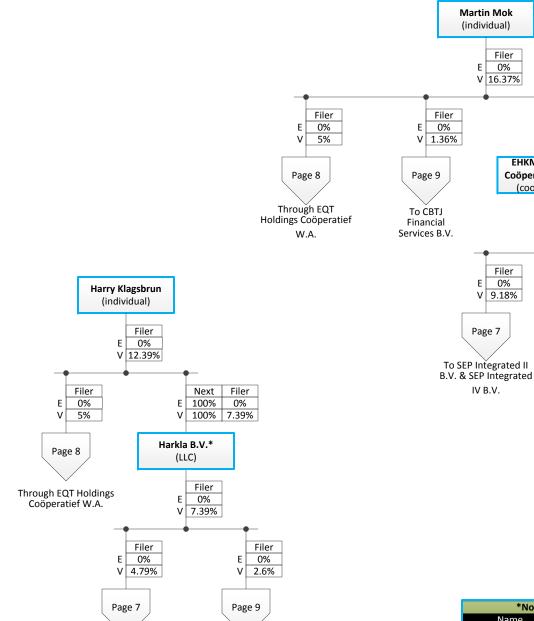


Specific Approval Entity or Individual Next = Interest in next entity in structure

Filer = Interest in Tampnet Inc.

Note = Voting interests in the filer identified herein have been calculated in accordance with FCC rules (47 C.F.R. 1.992) and may not reflect the actual voting interest indirectly held in the filer.





Through CBTJ

Financial

Services B.V.

Through SEPCO B.V.

& SEP Integrated IV

B.V.

E= Equity Interest V=Voting Interest

Next = Interest in next entity in structure Filer = Interest in Tampnet Inc.

Note = Voting interests in the filer identified herein have been calculated in accordance with FCC rules (47 C.F.R. 1.992) and may not reflect the actual voting interest indirectly held in the filer.



**Martin Mok** 

(individual)

Ε 0% V 16.37%

Filer

Filer

0%

V 9.18%

Page 7

IV B.V.

Filer

0%

10%

Filer

0%

V 0.81%

Page 9

To CBTJ

Financial

Services B.V.

Next

100%

100%

Filer

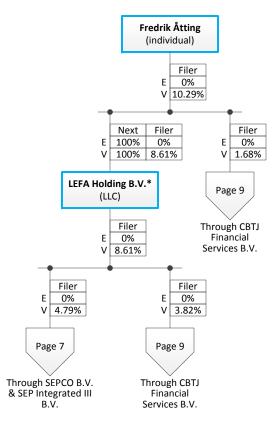
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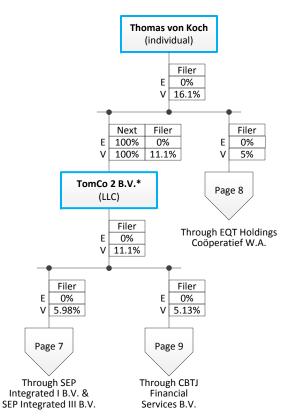
EHKM Holdings

Coöperatief W.A.\*

(cooperative)

V 10%

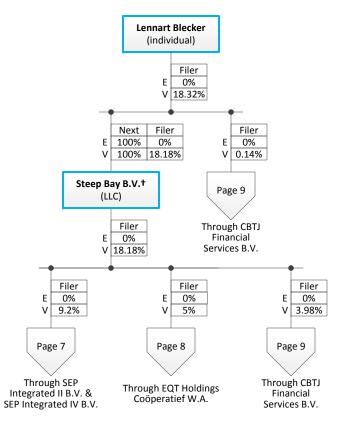




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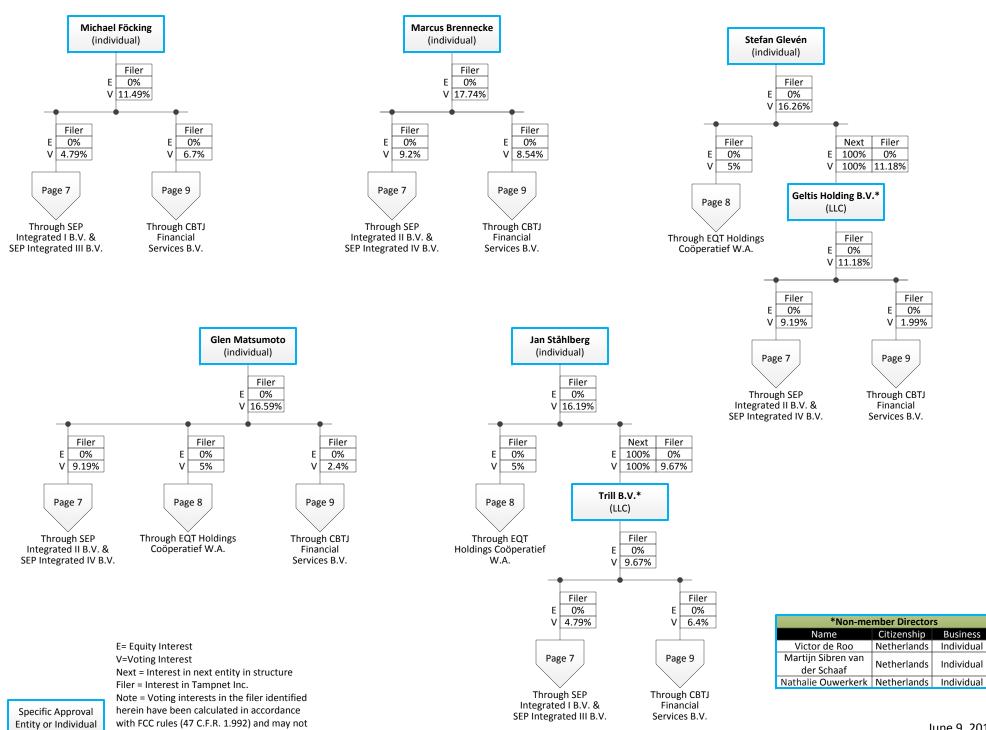
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Note = Voting interests in the filer identified herein have been calculated in accordance with FCC rules (47 C.F.R. 1.992) and may not reflect the actual voting interest indirectly held in the filer.



† Non-member Director										
Name	Citizenship	Business								
Lars Adam Ludvig Larsson	Switzerland	Individual								

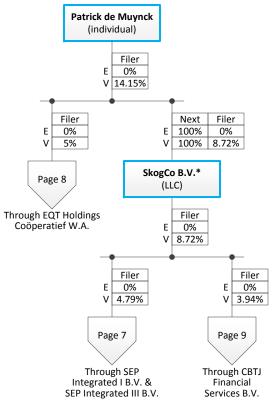
*Non-member Directors											
Name	Citizenship	Business									
Victor de Roo	Netherlands	Individual									
Martijn Sibren van	Netherlands	Individual									
der Schaaf	Netherlands	individual									
Nathalie Ouwerkerk	Netherlands	Individual									

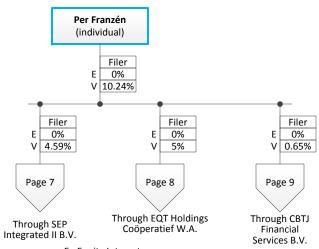


reflect the actual voting interest indirectly

held in the filer.

June 9, 2016



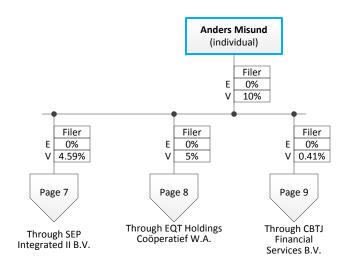


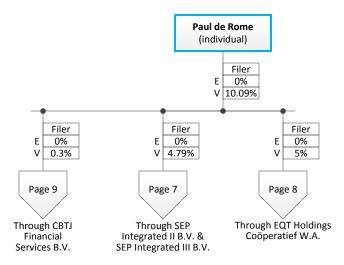
Specific Approval Entity or Individual E= Equity Interest V=Voting Interest

Next = Interest in next entity in structure

Filer = Interest in Tampnet Inc.

Note = Voting interests in the filer identified herein have been calculated in accordance with FCC rules (47 C.F.R. 1.992) and may not reflect the actual voting interest indirectly held in the filer.





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

EXHIBIT C-1
Entities and Individuals Seeking Specific Approval

	Citizenship or	Type of		In	terest
Name	Place of Organization	Type of Organization	Principal Business	in	Filer
	Organization			Equity	Voting
1. Tampnet AS	Norway	Private Corp.	Telecommunic ations	100%	100%
2. Brent Invest AS	Norway	Private Corp.	Investment	100%	100%
3. Brent Holding AS	Norway	Private Corp.	Investment	100%	100%
4. Brent Infrastructure I B.V.	Netherlands	Limited Liability Corp.	Investment	94.92%	100%
5. Brent Infrastructure I S.à.r.l.	Luxembourg	Limited Liability Corp.	Investment	47.46%	100%
6. Brent Holding Guernsey Limited	Guernsey	Private Corp.	Investment	47.46%	100%
7. EQT Infrastructure (No. 1) Limited Partnership	England and Wales	Limited Partnership	Investment	39.79%	84.99%
8. EQT Infrastructure (No. 3) Limited Partnership	England	Limited Partnership	Investment	4.68%	10%
9. EQT Infrastructure (General Partner) LP	Guernsey	Limited Partnership	Investment	0.47%	100%
10. EQT Infrastructure LLP	Guernsey	Limited Liability Partnership	Investment	0%	100%
11. EQT V GmbH & Co. KG	Germany	Limited Partnership	Investment	0%	100%
12. EQT V Verwaltung GmbH	Germany	Limited Liability Corp.	Investment	0%	100%
13. CBTJ Financial Services B.V.	Netherlands	Limited Liability Corp.	Investment	0%	100%
14. EQT Infrastructure Limited	Guernsey	Private Corp.	Investment	0.3%	100%
15. EQT Funds Management Limited	Guernsey	Private Corp.	Investment	0%	100%
16. SEP Holdings B.V.	Netherlands	Limited Liability Corp.	Investment	0%	100%
17. SEP Integrated I B.V.	Netherlands	Limited Liability Corp.	Investment	0%	46.47%
18. SEP Integrated II B.V.	Netherlands	Limited Liability Corp.	Investment	0%	100%
19. SEPCO B.V.	Netherlands	Limited Liability Corp.	Investment	0%	17.58%
20. Glen Matsumoto	U.S.	Individual	N/A	0%	16.59%
21. Steep Bay B.V.	Netherlands	Limited Liability Corp.	Investment	0%	18.18%
22. Geltis Holding B.V.	Netherlands	Limited Liability Corp.	Investment	0%	11.18%
23. Stefan Glevén	Sweden	Individual	N/A	0%	16.26%
24. Conni Jonsson	Sweden	Individual	N/A	0%	27.55%
25. Qarlbo Associates	Luxembourg	Limited Liability Corp.	Investment	0%	22.55%

26. Victor de Roo	Netherlands	Individual	N/A	0%	100%
27. Nathalie Ouwerkerk	Netherlands	Individual	N/A	0%	100%
28. Martjin Sibren van der Schaaf	Netherlands	Individual	N/A	0%	100%
29. Rakso Holding B.V.	Netherlands	Limited Liability Corp.	Investment	0%	22.22%
30. Christian Sinding	Norwegian	Individual	N/A	0%	19.73%
31. Caspar Callerstrom	Swedish	Individual	N/A	0%	16.73%
32. Brent Infrastructure II SA	Luxembourg	Corporation	Investment	47.46%	100%
33. Brent Infrastructure Holding B.V.	Netherlands	Limited Liability Corp.	Investment	47.46%	100%
34. Peter Veldman	Netherlands	Individual	N/A	0%	100%
35. Brent Infrastructure II Holding S.à.r.l.	Luxembourg	Limited Liability Corp.	Investment	47.46%	100%
36. Michael Anatolitis	Cyprus	Individual	N/A	0%	100%
37. Karl Heinz Horrer	Germany	Individual	N/A	0%	100%
38. Jens Hollermann	Germany	Individual	N/A	0%	100%
39. Andrea Neubock-Escher	Austria	Individual	N/A	0%	100%
40. EQT Infrastructure II Limited Partnership	Netherlands	Limited Partnership	Investment	46.92%	100%
41. EQT Infrastructure II GP B.V.	Netherlands	Limited Liability Corp.	Investment	0%	100%
42. EQT Infrastructure II (No. 1) Feeder LP	U.K.	Limited Partnership	Investment	32.93%	70.18%
43. EQT Infrastructure II (No. 2) Feeder LP	U.K.	Limited Partnership	Investment	10.02%	21.36%
44. EQT Holdings II B.V.	Netherlands	Limited Liability Corp.	Investment	0%	100%
45. EQT Infrastructure II (GP) Ltd.	U.K.	Private Corp.	Investment	0%	100%
46. EQT Netherlands Management B.V.	Netherlands	Limited Liability Corp.	Investment	0%	100%
47. EQT AB	Sweden	Corporation	Investment	0%	100%
48. James Campbell Arrol	U.K.	Individual	N/A	0%	100%
49. Lars Adam Ludvig Larsson	Sweden	Individual	N/A	0%	100%
50. Investor Investments Holding AB	Sweden	Corporation	Investment	0%	100%
51. EQT International Holdings B.V.	Netherlands	Limited Liability Corp.	Investment	0%	100%
52. EQT Holdings Cooperatief W.A.	Netherlands	Cooperative	Investment	0%	100%
53. Investor Growth Capital Holding B.V.	Netherlands	Limited Liability Corp.	Investment	0%	100%
54. Investor AB	Sweden	Corporation	Investment	0%	100%
55. Investor Netherlands B.V.	Netherlands	Limited Liability Corp.	Investment	0%	100%
56. Knut and Alice Wallenberg Foundation	Sweden	Foundation	Research	0%	42.2%
57. Marcus Jacobus Maria Hollander	Netherlands	Individual	N/A	0%	100%
58. Andreas Georg Christiaan Demmel	German	Individual	N/A	0%	100%

59. Robert de Heus	Netherlands	Individual	N/A	0%	100%
60. Petra Hedengran	Sweden	Individual	N/A	0%	100%
61. Anders Eckerwall	Sweden	Individual	N/A	0%	100%
62. Fredrik Åtting	Sweden	Individual	N/A	0%	10.29%
63. Harry Klagsbrun	Sweden	Individual	N/A	0%	12.39%
64. Michael Föcking	Germany	Individual	N/A	0%	11.49%
65. Paul de Rome	U.K.	Individual	N/A	0%	10.09%
66. Patrick de Muynck	Belgium	Individual	N/A	0%	14.15%
67. Jan Ståhlberg	Sweden	Individual	N/A	0%	16.19%
68. Thomas von Koch	Sweden	Individual	N/A	0%	16.1%
69. Marcus Brennecke	Germany	Individual	N/A	0%	17.74%
70. TomCo 2 B.V.	Netherlands	Limited Liability Corp.	Investment	0%	11.1%
71. Martin Mok	Hong Kong S.A.R.	Individual	N/A	0%	16.37%
72. EHKM Holdings Coöperatief W.A.	Netherlands	Cooperative	Investment	0%	10%
73. Lennart Blecher	Sweden	Individual	N/A	0%	18.32%
74. Fengyu B.V.	Netherlands	Limited Liability Corp.	Investment	0%	10.19%
75. Tak Wai Chung	British National (Overseas)	Individual	N/A	0%	10.66%
76. Anders Misund	Norway	Individual	N/A	0%	10%
77. Per Franzén	Sweden	Individual	N/A	0%	10.24%
78. CM Capital B.V.	Netherlands	Limited Liability Corp.	Investment	0%	100%
79. Harkla B.V.	Netherlands	Limited Liability Corp.	Investment	0%	7.39%
80. Trill B.V.	Netherlands	Limited Liability Corp.	Investment	0%	9.67%
81. Skogco B.V.	Netherlands	Limited Liability Corp.	Investment	0%	8.72%
82. LEFA Holding B.V.	Netherlands	Limited Liability Corp.	Investment	0%	8.61%
83. Stichting Bawau	Netherlands	Foundation	Trust	0%	100%
84. IGPE LP	Guernsey	Limited Partnership	Investment	0.33%	70%
85. EQT Holdings B.V.	Netherlands	Limited Liability Corp.	Investment	0%	100%

EXHIBIT C-2 Non-Member Managers' (Directors) Inherited Voting Interests in Tampnet Inc.

Non-sucher   Peter   James   Veldman   Arrival   Michael   Micha				11011-1	VICIIIDEI	vianag	cis (Difec	tors, im	iciica	voung mi	CI CS CS II					
Brent   Infrastructure   B.V.   100%   100				van der		Heinz		Neuböck			Adam Ludvig	Maria	Christiaan	Robert de Heus		
Brent   Infrastructure   I   100%	Entity:															
B.V.   Breat Infrastructure I   100%	Brent	1000	1000	1000												
Infrastructure   S.A.F.    100%   1		100%	100%	100%												
Infrastructure   S.A.F.    100%   1	Brent															
Sa.F.					100%	100%	100%	100%								
B.V.   100%	S.à.r.l.															
B.V.   100%																
Infrastructure   Holding S.Ar.   Holding S.Ar.   Holding S.Ar.   Holding S.Ar.   Holding S.Ar.   Holding B.V.   Holding B.V.	B.V.			100%					100%	100%						
Bolding Sar.1.   Brent   Infrastructure   Infrastructur																l
Brent   Infrastructure   Infrastructur					100%	100%	100%	100%								
Infrastructure   Holding B.V.   100%   100																
Holding B V.		100%							100%							
B.V.   100%	Holding B.V.	10070							10070							
EQT Holdings II B.V.				100%					100%	100%						
B.V.   100%										100,0						
Management   100%   1	B.V.			100%					100%	100%						
B.V.																
Investor Growth Capital Holding B.V.   SEP Integrated I B.V.   SEP Integrated II B.V.   SEP Integrated Integrated Integrated Integrated Integrated Integrated Integrated Integrated Integrated Int	Management	100%	100%						100%		100%					
Capital Holding B.V.   100%																
B.V.   SEP Integrated I   B.V.   100%   10												1000/	1000/	1000/	1000/	100%
SEP Integrated I B.V.   SEP Integrated II B.V.   SEP Integrated II B.V.   SEP CO B.V.   17.58%   17.58%   17.58%   17.58%   SEP CO B.V.   100%   100%   SEP CO B.V.   100%   100%   100%   100%   100%   SEP CO B.V.   100%   10												100%	100%	100%	100%	100%
SEP Integrated II   B.V.   100%   100%   100%	SEP Integrated I								46.47%	46.47%						
B.V. SEPCO B.V. 17.58%	B.V.															
CM Capital B.V.       100%       100%       100%         EQT HC Holdings I B.V.       5%       5%       5%         EQT International Holdings B.V.       100%       100%       100%         CBTJ Financial Services B.V.       100%       100%       100%         Fengyu B.V.       10.19%       10.19%       10.19%         Rakso Holding B.V.       22.22%       22.22%       22.22%	B.V.								100%	100%						
EQT HC Holdings I B.V.  EQT International Holdings B.V.  CBTJ Financial Services B.V.  Fengyu B.V.  Rakso Holding B.V.  22.22%  22.22%  5%  5%  5%  100%  100%  100%  100%  100%  100%  100%  22.22%  22.22%  22.22%	SEPCO B.V.			17.58%					17.58%	17.58%						
Holdings I B.V.   5%   5%   5%   5%   5%   5%   5%   5				100%					100%	100%						
EQT         International         100%				5%					5%	5%						
International   100%	EOT															
Holdings B.V.				100%					100%	100%						
CBTJ Financial Services B.V.         100%         <	Holdings B.V.			10070					10070	10070						
Fengyu B.V. 10.19% 10.19% 10.19% 22.22% 22.22% 22.22%	CBTJ Financial			1000/					1000/	1000/						
Rakso Holding B.V. 22.22% 22.22%	Services B.V.			100%					100%	100%						1
B.V. $\begin{vmatrix} 22.22\% \\ 22.22\% \end{vmatrix} = \begin{vmatrix} 22.22\% \\ 22.22\% \end{vmatrix} = \begin{vmatrix} 22.22\% \\ 22.22\% \end{vmatrix}$	Fengyu B.V.			10.19%					10.19%	10.19%						
	Rakso Holding B V			22.22%					22.22%	22.22%						
	Harkla B.V.			7.39%					7.39%	7.39%						

Non-member Directors:	Peter Veldman	James Arrol	Martijn van der Schaaf	Michael Anatolitis	Karl Heinz Horrer	Jens Höllermann	Andrea Neuböck -Escher	Victor de Roo	Nathalie Ouwerkerk	Lars Adam Ludvig Larsson	Marcus Jacobus Maria Hollander	Andreas Georg Christiaan Demmel	Robert de Heus	Petra Hedengran	Anders Eckerwall
EHKM Holdings Coöperatief W.A.			10%					10%	10%						
LEFA Holding B.V.			8.61%					8.61%	8.61%						
TomCo 2 B.V.			11.1%					11.1%	11.1%						
Steep Bay B.V.										18.18%					
Geltis Holding B.V.			11.18%					11.18%	11.18%						
Trill B.V.			9.67%					9.67%	9.67%						
SkogCo B.V.			8.72%					8.72%	8.72%						
EQT V															
Verwaltung GmbH					100%										

# EXHIBIT D

## **Insulation Certifications**

## Certification of 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 CBTJ Financial Services B.V., are true and correct.
- 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 that has not been specifically approved by the FCC pursuant to the FCC's foreign ownership rules applicable to common carrier licensees (codified in 47 C.F.R. Section 1.991(i), as the same may be amended, and the corresponding section, if any, of any successor regulation of similar import, in each case as in effect from time to time) is, or will be, engaged in active involvement in the management or operation of the Company, Tampnet AS, Tampnet, Inc., any subsidiaries of Tampnet Inc., or any successors-in-interest to the foregoing entities (collectively, the "Covered Entities").
- 4. Pursuant to this "no active involvement" certification, a foreign shareholder that has not been specifically approved by the FCC shall not serve as an officer, director, manager, committee member, employee, independent contractor, agent or otherwise perform any services for the Covered Entities, with the exception of making loans to, or acting as a surety for them; shall not be involved, directly or indirectly, in the policymaking activities of the Covered Entities or in their day-to-day management or operations; and shall not exercise investor rights (or be permitted to vote its investment units) on matters beyond the usual and customary investor protections delineated in 47 C.F.R Section 1.993(c), as may be amended from time to time, or any successor section. In addition, a foreign shareholder that has not been specifically approved by the FCC may nominate directors, officers, and managers, but is barred from appointing them.
- 5. The foregoing reflects my knowledge and belief based upon reasonable inquiry with the Covered Entities.



I declare, under penalty of perjury, that the foregoing is true and correct. I acknowledge that willful false statements made on this certification are punishable by fine and/or imprisonment (U.S. Code, Title 18, Section 1001) and/or revocation of any station license (U.S. Code, Title 47, Section 312(a)(1)), and/or forfeiture (U.S. Code, Title 47, Section 503).

Executed 30 May, 2016

M.S. van der Schaaf

V.A. De Roo

## Certification of 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 of 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 EQT Holdings Coöperatief W.A., are true and correct.
- 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 that has not been specifically approved by the FCC pursuant to the FCC's foreign ownership rules applicable to common carrier licensees (codified in 47 C.F.R. Section 1.991(i), as the same may be amended, and the corresponding section, if any, of any successor regulation of similar import, in each case as in effect from time to time) is, or will be, engaged in active involvement in the management or operation of the Company, Tampnet AS, Tampnet, Inc., any subsidiaries of Tampnet Inc., or any successors-in-interest to the foregoing entities (collectively, the "Covered Entities").
- 4. Pursuant to this "no active involvement" certification, a foreign shareholder that has not been specifically approved by the FCC shall not serve as an officer, director, manager, committee member, employee, independent contractor, agent or otherwise perform any services for the Covered Entities, with the exception of making loans to, or acting as a surety for them; shall not be involved, directly or indirectly, in the policymaking activities of the Covered Entities or in their day-to-day management or operations; and shall not exercise investor rights (or be permitted to vote its investment units) on matters beyond the usual and customary investor protections delineated in 47 C.F.R Section 1.993(c), as may be amended from time to time, or any successor section. In addition, a foreign shareholder that has not been specifically approved by the FCC may nominate directors, officers, and managers, but is barred from appointing them.
- 5. The foregoing reflects my knowledge and belief based upon reasonable inquiry with the Covered Entities.

I declare, under penalty of perjury, that the foregoing is true and correct. I acknowledge that willful false statements made on this certification are punishable by fine and/or imprisonment (U.S. Code, Title 18, Section 1001) and/or revocation of any station license (U.S. Code, Title 47, Section 312(a)(1)), and/or forfeiture (U.S. Code, Title 47, Section 503).

Executed 30 May, 2016

M.S. van der Schaaf

V.A. De Roo

## Certification of 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<sup>th</sup> March, 2016).
- 2. The facts stated in the Tampnet Petition for Declaratory Ruling Supplement dated 11<sup>th</sup> March, 2016, with respect to SEP Holdings B.V., are true and correct.
- 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 that has not been specifically approved by the FCC pursuant to the FCC's foreign ownership rules applicable to common carrier licensees (codified in 47 C.F.R. Section 1.991(i), as the same may be amended, and the corresponding section, if any, of any successor regulation of similar import, in each case as in effect from time to time) is, or will be, engaged in active involvement in the management or operation of the Company, Tampnet AS, Tampnet, Inc., any subsidiaries of Tampnet Inc., or any successors-in-interest to the foregoing entities (collectively, the "Covered Entities").
- 4. Pursuant to this "no active involvement" certification, a foreign shareholder that has not been specifically approved by the FCC shall not serve as an officer, director, manager, committee member, employee, independent contractor, agent or otherwise perform any services for the Covered Entities, with the exception of making loans to, or acting as a surety for them; shall not be involved, directly or indirectly, in the policymaking activities of the Covered Entities or in their day-to-day management or operations; and shall not exercise investor rights (or be permitted to vote its investment units) on matters beyond the usual and customary investor protections delineated in 47 C.F.R Section 1.993(c), as may be amended from time to time, or any successor section. In addition, a foreign shareholder that has not been specifically approved by the FCC may nominate directors, officers, and managers, but is barred from appointing them.
- 5. The foregoing reflects my knowledge and belief based upon reasonable inquiry with the Covered Entities.



I declare, under penalty of perjury, that the foregoing is true and correct. I acknowledge that willful false statements made on this certification are punishable by fine and/or imprisonment (U.S. Code, Title 18, Section 1001) and/or revocation of any station license (U.S. Code, Title 47, Section 312(a)(1)), and/or forfeiture (U.S. Code, Title 47, Section 503).

Executed 30 May, 2016

M.S. van der Schaaf

V.A. De Roo

#### **EXHIBIT E**

## Intermediary Entities Not Disclosed on Exhibit B (Ownership Structure)

The entities set forth below hold an indirect non-disclosable interest in Tampnet AS, Tampnet Inc., and Tampnet Licensee ("the Companies") through the three "feeder" entities in the Tampnet ownership structure: SEP Holdings, B.V.; CBTJ Financial Services, B.V.; and EQT Holdings Cooperatief, W.A. Their interests are not disclosed on the ownership structure chart, as set forth in Exhibit B, because the ownership interests of these entities fall below 10% in the Companies and the applicant has submitted certifications establishing that all foreign shareholders that have not been specifically approved by the FCC are insulated. Accordingly, in the interest of clarity these entities were not disclosed on the ownership structure.

<u>Name</u>	Place of Formation
Aletsch Holding B.V.	Netherlands
<u> </u>	Norway
2. AM Holding AS	Norway
3. Anga Kapital AS	·
4. Baggins AS	Norway
5. BJ Capital Oy	Finland
6. CBTJ 21 Holding B.V.	Netherlands
7. CBTJ 22 Holding B.V.	Netherlands
8. CBTJ 23 Holding B.V.	Netherlands
9. CBTJ 24 Holding B.V.	Netherlands
10. CBTJ 25 Holding B.V.	Netherlands
11. CBTJ 26 Holding B.V.	Netherlands
12. CBTJ 27 Holding B.V.	Netherlands
13. CBTJ 28 Holding B.V.	Netherlands
14. CBTJ 32 Holding B.V.	Netherlands
15. CBTJ 37 Holding B.V.	Netherlands
16. CBTJ 38 Holding B.V.	Netherlands

17. CBTJ Equity B.V.	Netherlands
•	Netherlands
18. CBTJ IX Holding B.V.	Netherlands
19. CBTJ V Holding B.V.	Netherlands
20. CBTJ XIII Holding B.V.	
21. CBTJ XVII Holding B.V.	Netherlands
22. De Rome B.V.	Netherlands
23. EQT Credit B.V.	Netherlands
24. EQT Credit Investments Feeder LLP	United Kingdom
25. EQT Expansion Capital I B.V.	Netherlands
26. EQT Expansion Capital II B.V.	Netherlands
27. EQT Greater China II Equity B.V.	Netherlands
28. EQT HC Holdings I B.V.	Netherlands
29. EQT HC Holdings II B.V.	Netherlands
30. EQT Infra II FC Holding B.V.	Netherlands
31. EQT Infrastructure B.V.	Netherlands
32. EQT Infrastructure II Coöperatief U.A.	Netherlands
33. EQT IV Equity B.V.	Netherlands
34. EQT Mid Market Coöperatief U.A.	Netherlands
35. EQT MMF Participation B.V.	Netherlands
36. EQT MMFC Holding B.V.	Netherlands
37. EQT Opportunity Equity B.V.	Netherlands
38. EQT V Equity B.V.	Netherlands
39. EQT VI Equity B.V.	Netherlands
40. EQT VI Participation B.V.	Netherlands

41. EQT VI Participation II B.V.	Netherlands
_	Denmark
42. Frececo ApS	Netherlands
43. Geltis Investment B.V.	Netherlands
44. Harkla B.V.	Netherlands
45. Harkla Invest B.V.	Netherlands
46. HAS Invest B.V.	Denmark
47. Hefeax ApS	Netherlands
48. Hejsan B.V.	Netherlands
49. Helmholtz Invest B.V.	Netherlands
50. Hokiu B.V.	Denmark
51. JKP Holding ApS	Finland
52. Kanto Capital Oy	Netherlands
53. Kattson B.V.	Sweden
54. Keppel Bay AB	Finland
55. Kirva Holding Oy	Netherlands
56. LEFA Holding B.V.	Netherlands
57. LGA Amsterdam B.V.	Netherlands
58. LGA Invest B.V.	Netherlands
59. Maya Singapore B.V.	Netherlands
60. Norgrove B.V.	Netherlands
61. Otto Invest B.V.	Sweden
62. Oy Nissala Ab	Netherlands
63. Qarlbo Netherlands B.V.	Denmark
64. RKN Equity ApS	Deninark

65. SEP Integrated III B.V.	Netherlands
66. SEP Integrated IV B.V.	Netherlands
67. SimCap Oy	Finland
68. SkogCo B.V.	Netherlands
69. SkogCo I B.V.	Netherlands
70. Stockholm Atlantic B.V.	Netherlands
71. Stockholm Pacific B.V.	Netherlands
72. Stretta Capital Oy	Finland
73. Tilsted B.V.	Netherlands
74. Tilsted Holding B.V.	Netherlands
75. TimeLease III Limited	Guernsey
76. TimeLease IV Limited	Guernsey
77. TimeLease V Limited	Guernsey
78. TomCo Invest B.V.	Netherlands
79. Top Ambition Investments Limited	British Virgin Islands
80. Trill B.V.	Netherlands
81. Trill Limited Partnership	Scotland
82. Trill Netherlands B.V.	Netherlands
83. Vandeley B.V.	Netherlands
84. Viturin Netherlands B.V.	Netherlands
85. Wisako Capital Oy	Finland