

December 9, 2016

**VIA myIBFS**

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

**Re: *In the Matter of GigSky, Inc., Petition for Declaratory Ruling Under Section 310(b)(4) of the Communications Act, as amended***  
**(File No. ISP-PDR-20160415-00008)**

Dear Ms. Dortch:

GigSky, Inc. ("GigSky," or "Petitioner"), by its undersigned counsel, hereby amends its petition in the above-matter ("Petition") with regards to the individuals and entities for which it requests specific and advance approval of foreign indirect ownership interests in FCC wireless licenses, WQJZ324 and WQJZ325 (the "Wireless Licenses") pursuant to 47 C.F.R. §§ 1.991 (i) and (k), respectively.

This amendment is submitted due to GigSky's recent additional round of funding that brought on another foreign investor, Kisco(T), Ltd. (another Kisco, Ltd. company); that new investor has changed the percentages of all the owners, including the entities listed in GigSky's previous submission with ten percent or greater ownership: Ravi Rishy-Maharaj (37.26%) and Takekazu Kishimoto (13.184%). Two additional investors were also added, FairBridge GigSky, LLC. (U.S.) ("FairBridge GigSky"), and WiL Fund 1 L.P. (Japan) ("WiL Fund").

For the Commission's convenience, a chart listing all the entities with five percent or greater ownership is attached hereto as Exhibit A.

GigSky states as follows:

**F. Direct and Indirect Ownership (47 C.F.R. § 1.991(e) and (f)):**

Following the Proposed Transaction, GigSky Mobile, a U.S. entity, will retain a 100% ownership interest in the Wireless Licenses. GigSky Mobile, in turn, will be a wholly-owned subsidiary of GigSky. Following completion of the Proposed Transaction, Mr. Rishy-Maharaj will hold a direct 29.883% ownership interest in GigSky, Inc. and an indirect 3.875% ownership in GigSky, Inc., through his ownership of 95% of Kinaare Networks Corporation. As a result, Mr. Rishy-Maharaj will hold an indirect 33.758% ownership interest in GigSky Mobile. FairBridge GigSky, a Delaware limited liability company, will hold a direct 10.683% ownership interest in GigSky and, therefore, an indirect ownership interest in the Wireless Licenses.

**G. Ownership Information (47 C.F.R. § 1.991(g)):**

As a result of the proposed transaction at issue in the Petition ("Proposed Transaction"), the following entities and individuals will hold a ten percent or greater ownership interest in GigSky Mobile:

**Name:** GigSky, Inc.  
**Address:** 2390 El Camino Real, Suite 250  
Palo Alto, CA 94306  
**Principal Business:** Telecommunications  
**Citizenship:** United States  
**Ownership Interest:** 100%

As a result of the Proposed Transaction, the following entities and individuals will hold a ten percent or greater ownership interest in GigSky:

**Name:** FairBridge GigSky, LLC  
**Address:** 1105 N. Market Street, Suite 1800  
Wilmington, DE 19801  
**Principal Business:** established for the sole purpose of investing in GigSky, Inc.  
**Citizenship:** United States  
**Ownership Percentage:** 10.683%

**Name:** Ravi Rishy-Maharaj  
**Address:** 2390 El Camino Real, Suite 250  
Palo Alto, CA 94306  
**Principal Business:** Individual  
**Citizenship:** Canada  
**Ownership Percentage:** 33.758%

Mr. Rishy-Maharaj holds a 29.883% direct, individual interest in GigSky, and additionally a 3.875% indirect ownership interest in GigSky, through his ownership of 95% of Kinaare Networks Corporation.

**Name:** Takekazu Kishimoto  
**Address:** 3-3-7 Fushimimachi, Chuo-ku,  
Osaka, 541-8513, Japan  
**Principal Business:** Individual  
**Citizenship:** Japan  
**Ownership Percentage:** 17.386%

**Name:** Kisco, Ltd.  
**Address:** Osaka, 541-8513, Japan  
**Principal Business:** pharmaceuticals, chemicals, food products, medical devices,  
building materials, and semiconductor and other electronic  
Devices.  
**Citizenship:** Japan  
**Ownership Percentage:** 6.675%.

**Name:** Kisco(T), Ltd.

**Address:** 159 Sermit Tower, 11th Floor, Sukhumvit 21 Road, (Asoke), North Klongtoey, Watana, Bangkok 10110, Thailand

**Principal Business:** Domestic sales and export/import for the following:  
Shin-Etsu Silicone for electronics, automotive, construction, etc., Senju Solder & electronic materials, adhesive and lubrication for electronics, automotive Seiki Hot Runner System parts for plastic injection and mold, Nitto Coating material for electronics.  
Manufacturing and processing of the following items:  
Dix Conformal Coating and thermal conductive sheet conversion.

**Citizenship:** Thailand

**Ownership Percentage:** 4.079%

Mr. Kishimoto's interest in the Wireless Licenses exists through a combination of a direct, individual interest in GigSky (6.632% post-transaction), and his majority ownership and actual control of Kisco Ltd. ("Kisco") (6.675%) and Kisco(T), Ltd. (4.079%), a subsidiary of Kisco, as President. The Kisco entities combined will have a 10.754% interest in GigSky following the Proposed Transaction. Accordingly, due to a combination of Mr. Kishimoto's direct interest in GigSky and through his interest in Kisco, Mr. Kishimoto's aggregate foreign indirect ownership interest in the Wireless Licenses will increase from 2.637% prior to the transaction, to 17.386% as a result of the transaction.

## **J. Requests for Specific Approval (47 C.F.R. §§ 1.991(i) and (j)):**

### **1. Ravi Rishy-Maharaj:**

Petitioner requests specific approval of the increase in the foreign indirect ownership of Mr. Rishy-Maharaj, a Canadian citizen, in the Wireless Licenses, from 6.557% prior to the transaction, to 33.758% following the transaction.

### **2. Takekazu Kishimoto:**

Petitioner requests specific approval of the increase in the foreign indirect ownership of Mr. Kishimoto, a Japanese citizen, in the Wireless Licenses, from 2.637% to 17.386%.

### **3. Kisco Ltd.:**

Petitioner requests specific approval of the increase in the foreign indirect ownership of Kisco in the Wireless Licenses, from 1.182% to 10.754%. Kisco is a Japanese Limited Company with its principal place of business at 3-3-7 Fushimimachi, Chuo-ku, Osaka, 541-8513, Japan. The company's principal business is the manufacture and sale of a wide array of products including: pharmaceuticals, chemicals, food products, medical devices, building materials, and semiconductor and other electronic devices.

As stated above, Mr. Kishimoto maintains majority ownership and actual control of Kisco as President.

#### **4. WiL Fund 1 L.P.:**

Petitioner requests specific approval of WiL Fund's direct foreign ownership of 6.702% of GigSky. WiL Fund is a Cayman Islands limited partnership with its principal place of business is 102 University Avenue, Suite 1A, Palo Alto, California 94301. WiL Fund's principal business is an investment fund.

There are two entities that control 10% or more of WiL Fund: Innovative Network Corporation of Japan ("INCJ") and ANA Holdings, Inc. ("ANA"). WiL Fund also has a general partner, WiL GP I L.P. (Cayman Islands) ("WiL GP"). WiL GP owns only 2% of WiL Fund, but information is presented here because WiL GP will have some management duties regarding WiL Fund.

##### INCJ

INCJ owns 27.2% of WiL Fund. INCJ is a Japanese public-private partnership with its principal place of business at Marunouchi Eiraku Bldg. 21F, 1-4-1 Marunouchi, Chiyoda-ku, Tokyo 100-0005. INCJ's principal business is providing financial, technological and management support to technology businesses. The Government of Japan holds a 91% direct ownership interest in INCJ. The remaining 9% is widely held, and no other entity or individual holds more 5% of INCJ.

##### ANA

ANA owns 11.09% of WiL Fund. ANA is a Japanese corporation with its principal place of business at Shiodome City Center 1-5-2 Higashi-Shinbashi, Minato-ku, Tokyo 105-7133. ANA's principal business is aviation. ANA is publicly held, and no shareholder owns more than 2.87% of the company.

##### WiL GP

As stated above, WiL GP owns 2% of WiL Fund. WiL GP is a Cayman Islands limited partnership with its principal place of business at 102 University Avenue, Ste 1A, Palo Alto, California 94301. WiL GP's principal business is financial investing. One individual owns 10% or more of WiL GP: Gen Isayama, a citizen of Japan, owns 92.5% of WiL GP. Mr. Isayama, whose principal business is venture capital investing, is a U.S. Permanent Resident. His business address is 102 University Ave., Suite 1A, Palo Alto, CA 94301

**K. Requests for Advance Approval (47 C.F.R. § 1.991(k)):**

GigSky seeks advance approval for Mr. Ravi Rishy-Maharaj, Mr. Takekazu Kishimoto, Kisco Ltd., and WiL Fund 1, L.P. to increase their direct or indirect ownership interests in the Wireless Licenses up to a non-controlling 49.99%.

Should you have any questions regarding this letter, please contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M. Donahue", is centered below the text "Respectfully submitted,".

Michael P. Donahue  
Ronald E. Quirk  
*Counsel for GigSky, Inc.*

cc: Susan O'Connell (via email)  
Gabrielle Kim (via email)