

November 4, 2016

VIA myIBFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th 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 (j), and 47 C.F.R. § 1.991(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%).

For the Commission's convenience, a chart listing all the entities with five percent or greater ownership is attached hereto. As the information submitted therein contains financially sensitive, trade secret information, the release of which would cause GigSky competitive harm, pursuant to Sections 0.457 and 0.459 of the Commission's Rules¹ GigSky requests that the Commission keep the attachment confidential.

GigSky states as follows:

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

¹ 47 C.F.R. §§ 0.457, 0.459.

Principal Business: Palo Alto, CA 94306
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 the GigSky:

Name: Ravi Rishy-Maharaj
Address: 2390 El Camino Real, Suite 250
Palo Alto, CA 94306
Principal Business: Individual
Citizenship: Canada
Ownership Percentage: 29.883%

Mr. Rishy-Maharaj holds a 25.804% direct, individual interest in GigSky, and additionally a 4.079% indirect ownership interest in GigSky, through his ownership 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 Sermmit Tower, 11th Floor, Sukhumvit 21 Road,
(Asoke), North Klongtoey, Watana, Bangkok 10110
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%) 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 29.883% 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 productions 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.

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

GigSky does not seek additional advance approval other than the request in its Petition for Mr. Ravi Rishy-Maharaj to increase his 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 that reads "Michael P. Donahue". The signature is written in a cursive, flowing style.

Michael P. Donahue

Counsel for GigSky, Inc.