

October 11, 2018

Tom Sullivan
Chief, International Bureau
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

Re: Colombo Topco Limited, Petition for Declaratory Ruling under Section 310(b)(4) of the Communications Act of 1934, As Amended (filed Aug. 24, 2018)

Mr. Sullivan:

This letter (“Supplement”) supplements the petition for declaratory ruling (“Petition”) filed with the Federal Communications Commission (“FCC” or “Commission”) on August 24, 2018, by Colombo Topco Limited (“Colombo”), on behalf of its current and future FCC licensee and lessee subsidiaries,¹ pursuant to Section 310(b)(4) of the Communications Act of 1934, as amended, and Section 1.5000(a)(1) of the Commission’s rules.² The Petition requested a determination from the Commission that it would not serve the public interest to prohibit indirect foreign ownership of Colombo and its subsidiaries of up to 100 percent.³

At the request of the staff of the International Bureau, this Supplement clarifies that the Petition is intended to seek approval from the Commission for Tampnet Inc. to be directly and indirectly controlled by the foreign entities set forth in the Petition and this Supplement. As set forth in the Petition, Tampnet, Inc., a domestic corporation, is the direct parent company of Tampnet Licensee LLC and the indirect parent company (through Tampnet Holdco Inc.) of Tampnet USA, LLC, and both Tampnet Licensee LLC and Tampnet USA, LLC are domestically organized common carrier wireless licensees.⁴ The clarifications set forth herein are all consistent with, and supported by, the public interest showing set forth in Section IV of the Petition.⁵

¹ 47 C.F.R. § 1.5000(c)(2)(ii).

² 47 C.F.R. § 1.5000(a)(1).

³ Colombo Topco Limited, Petition for Declaratory Ruling under Section 310(b)(4) of the Communications Act of 1934, As Amended (filed Aug. 24, 2018) (“Petition”). The Petition has not yet been placed on public notice by the Commission.

⁴ See Petition at 1-2. As set forth *infra* on page 6 of this Supplement, the Supplement also replaces Appendix A attached to the Petition with a new Appendix A attached hereto. The new Appendix A corrects the identity of the holder of certain wireless licenses.

⁵ See Petition at 13-14.

Information Required by Sections 1.5001

Out of an abundance of caution and as set forth below, this Supplement adds Tampnet Inc. to the Petition as a petitioning applicant. Consequently, Sections 1 and 2 of the Petition are modified by this Supplement to add the following information.

1. SECTION 1.5001(A): CONTACT INFORMATION, FRN, PLACE OF ORGANIZATION, TYPE OF BUSINESS ORGANIZATION, AND NAME AND TITLE OF OFFICER CERTIFYING TO THE INFORMATION CONTAINED IN THE PETITION

Name: Tampnet Inc.
FRN: 0023627375
Mailing Address: 309 Apollo Road
Scott, LA 70583
Place of Organization: Delaware, USA
Telephone: (337) 205-8751
Email Address: hex@tampnet.com
Type of Organization: Corporation
Officer Certifying to the Information Contained in the Petition:
David Heximer, Director

2. SECTION 1.5001(B): LEGAL COUNSEL CONTACT

Name: K.C. Halm
Mailing Address: Davis Wright Tremaine LLP
1919 Pennsylvania Avenue N.W., Suite 800
Washington, D.C. 20006
Telephone: (202) 973-4287
Facsimile: (202) 730-4499
Email: kchalm@dwt.com

This Supplement does not affect the responses set forth in Sections 3-5 of the Petition.

This Supplement provides additional information about Tampnet AS, which is the sole entity that *directly* will hold a ten percent or greater equity and/or voting interest, or a controlling interest in Tampnet Inc. Tampnet AS's direct 100 percent equity and voting interest in Tampnet Inc. was depicted in the organizational chart attached to the Petition as Appendix B.⁶ Section 6 of the Petition is modified by this Supplement to add the following information.

⁶ See Petition, Appendix B.

6. SECTION 1.5001(E) AND (G): DIRECT OWNERSHIP

Name: Tampnet AS
Address: Hinna Park, Stadionblokk C, Jattavagavein 7
N-4020 Stavanger, Norway
Place of Organization: Norway
Type of Organization: Corporation
Principal Business: Telecommunications
Percentage Held: Tampnet AS will hold a direct 100 percent voting and equity interest in Tampnet Inc.

In addition to the entities listed in Section II(7) of the Petition, the following entities will hold an *indirect* ten percent or greater equity and/or voting interest, or a controlling interest, in Tampnet Inc. Each of these entities was referenced in the Petition and/or depicted in the organizational chart attached to the Petition as Appendix B.⁷ Section 7 of the Petition is modified by this Supplement to provide additional information about each entity.

7. SECTION 1.5001(F) AND (G): INDIRECT OWNERSHIP

Name: Brent Invest AS
Address: Hinna Park, Stadionblokk C, Jattavagavein 7
N-4020 Stavanger, Norway
Place of Organization: Norway
Type of Organization: Corporation
Principal Business: Holding company
Percentage Held: Brent Invest AS holds a direct 100 percent equity and voting interest in Tampnet AS, which, in turn, holds a direct 100 percent equity and voting interest in Tampnet Inc.

Name: Brent Holding AS
Address: Hinna Park, Stadionblokk C, Jattavagavein 7
N-4020 Stavanger, Norway
Place of Organization: Norway
Type of Organization: Corporation
Principal Business: Holding company
Percentage Held: Brent Holding AS holds a direct 100 percent equity and voting interest in Brent Invest AS. Brent Invest AS, in turn, holds a direct 100 percent equity and voting interest in Tampnet AS, which holds a direct

⁷ See Petition at 2-3, note 9, Appendix B.

100 percent equity and voting interest in Tampnet Inc.

Name: Colombo Bidco Limited
Mailing Address: 16 Palace Street,
London, SW1E 5JD, United Kingdom
Place of Organization: United Kingdom
Type of Organization: Limited company
Principal Business: Holding company
Percentage Held: Colombo Bidco Limited will hold a direct 100 percent equity and voting interest in Brent Holding AS following the consummation of the transaction. Brent Holding AS holds a direct 100 percent equity and voting interest in Brent Invest AS. Brent Invest AS, in turn, holds a direct 100 percent equity and voting interest in Tampnet AS, which holds a direct 100 percent equity and voting interest in Tampnet Inc.

Name: Colombo Holdco Limited
Mailing Address: 16 Palace Street,
London, SW1E 5JD, United Kingdom
Place of Organization: United Kingdom
Type of Organization: Limited company
Principal Business: Holding company
Percentage Held: Colombo Holdco Limited holds a direct 100 percent voting and equity interest in Colombo Bidco Limited, which, in turn, will hold a direct 100 percent equity and voting interest in Brent Holding AS following the consummation of the transaction. Brent Holding AS holds a direct 100 percent equity and voting interest in Brent Invest AS. Brent Invest AS holds a direct 100 percent equity and voting interest in Tampnet AS, which holds a direct 100 percent equity and voting interest in Tampnet Inc.

Name: Colombo Topco Limited
Mailing Address: 16 Palace Street,
London, SW1E 5JD, United Kingdom
Place of Organization: United Kingdom
Type of Organization: Limited company
Principal Business: Holding company

Percentage Held: Colombo Topco Limited, which is the petitioner in the Petition, holds a direct 100 percent voting and equity interest in Colombo Holdco Limited. The ownership of Colombo Topco Limited is detailed in the Petition.⁸ Colombo Holdco Limited, in turn, holds a direct 100 percent voting and equity interest in Colombo Bidco Limited. Colombo Bidco Limited will hold a direct 100 percent equity and voting interest in Brent Holding AS following the consummation of the transaction. Brent Holding AS holds a direct 100 percent equity and voting interest in Brent Invest AS. Brent Invest AS holds a direct 100 percent equity and voting interest in Tampnet AS, which holds a direct 100 percent equity and voting interest in Tampnet Inc.

This Supplement does not affect the responses set forth in Sections 8 and 9 of the Petition.

The Supplement adds the following foreign entities to Section 10 of the Petition and clarifies that the Petition requests the Commission to provide specific approval for each of these foreign entities. More detailed information regarding each of these entities is set forth above.

10. SECTION 1.5001(I) AND (J): REQUESTS FOR SPECIFIC APPROVAL

- Tampnet AS
- Brent Invest AS
- Brent Holding AS
- Colombo Bidco Limited
- Colombo Holdco Limited
- Colombo Topco Limited

The Supplement adds the following foreign entities to Section 11 of the Petition and clarifies that the Petition seeks approval for each of these foreign entities to obtain up to a 100 percent equity and voting interest in Tampnet Inc.

11. SECTION 1.5001(K): REQUESTS FOR ADVANCE APPROVAL

- Tampnet AS
- Brent Invest AS

⁸ Petition at 5-8, Appendix B.

- Brent Holding AS
- Colombo Bidco Limited
- Colombo Holdco Limited
- Colombo Topco Limited

Replacement of Appendix A to the Petition

Tampnet Inc. recently filed modification applications to resolve a minor licensing issue concerning nine common carrier fixed point-to-point microwave (CF) licenses and five microwave industrial/business pool licenses (MG) held by Tampnet Licensee, LLC.⁹ These licenses were inadvertently identified as being held by Tampnet Inc. in a prior administrative update filed by Tampnet Inc.'s microwave licensing vendor, and they were mistakenly listed as being held by Tampnet Inc. in the Appendix A attached to the Petition. An updated exhibit to the pending transfer of control applications in connection with these licenses will be filed shortly reflecting the resolution of this issue pursuant to the recently filed modification applications referenced above. In addition, the identity of the licensee of these licenses has been corrected in the attached Appendix A, which replaces the Appendix A initially attached to the Petition.

⁹ See FCC File Nos. 0008388236; 0008388264; 0008388350; 0008388367; 0008388426; 0008388481; 0008388483; 0008388488; 0008388491; 0008388498; 0008388506; 0008388510; 0008388514.

Tom Sullivan
October 11, 2018
Page 7

Colombo Topco Limited and Tampnet Inc. respectfully request the Commission to promptly grant the Petition as clarified by this Supplement. Please address any questions about the foregoing to the undersigned.

Respectfully submitted,

/s/ Kathleen Abernathy

Kathleen Q. Abernathy
Jonathan V. Cohen
Phillip R. Marchesiello
Wilkinson Barker Knauer, LLP
1800 M Street, N.W., Suite 800N
Washington, D.C. 20036
202.783.4141 (tele.)
202.783.5851 (fax)
kabernathy@wbklaw.com
joncohen@wkblaw.com
pmarchesiello@wbklaw.com

Counsel for Colombo Topco Limited

/s/ K.C. Halm

K.C. Halm
Katori Copeland
Davis Wright Tremaine LLP
1919 Pennsylvania Avenue N.W., Suite 800
Washington, D.C. 20006
202.973.4287 (tele.)
202.730.4499 (fax)
kchalm@dwt.com
katoricopeland@dwt.com

Attachments

APPENDIX A

FCC LICENSES AND LEASES

Licensee	License/Authorization	File Number/ Call Sign
Tampnet Inc.	International Section 214 Authorization	ITC-214-20150901-00218
	Domestic Section 214 Authorization	n/a
	Non-Common Carrier Earth Station	E100138 E140042
Tampnet USA LLC	CL – Cellular	KNKA411 KNKA412
	AW – AWS	WQGD642 WQGD643
	Common Carrier Earth Station	E850118 E850191 E940069 E940070 E940071 E980371
	Non-Common Carrier Earth Station	E040350 E040351 E040354 E040356 E040357 E040358 E040359 E040360 E090017 E090019 E090038 E090051 E090052 E090067 E090110 E090162 E090184

Licensee	License/Authorization	File Number/ Call Sign
		E130128 E850119 E960472 E970089 E970201
Tampnet Licensee LLC	CL – Cellular Spectrum Leases	L000020229 L000020230
	NN – 3650-3700 MHz	WQHV537
	CF – Common Carrier Fixed Point-to-Point Microwave	WQKF526 WQKF547 WQKF562 WQKF568 WQKF569 WQKF570 WQKF573 WQKG307 WQKQ778 WQKQ779 WQKQ780 WQKQ783 WQKQ785 WQLX474 WQLX476 WQMN491 WQNN591 WQNN593 WQNN596 WQTJ933 WQTJ947 WQTK206 WQTK213 WQTK215 WQTK234 WQTK364 WQTK366

Licensee	License/Authorization	File Number/ Call Sign
		WQTK379
		WQUN938
		WQYU465
		WQYU467
		WQYU475
		WQYU478
		WQYW382
		WQYW383
		WQZH984
		WQZH985
		WQZH986
		WQZH987
		WQZH988
		WQZI421
		WQZP902
		WQZP903
		WQZW494
		WQZW495
		WQZW528
		WQZW529
		WQZW542
		WQZW545
		WQZW548
		WQZW549
		WQZW550
		WQZX656
		WRBN347
		WRCB900
		WQKF558
		WQKF559
		WQKF561
		WQKQ781
		WQLX475
		WQLX478
		WQMN211

Licensee	License/Authorization	File Number/ Call Sign
		WQNN589 WQNQ770
	MG – Microwave Industrial/ Business Pool	WQXA470 WQXA471 WQXA474 WQXA476 WQXA477

CERTIFICATION

On behalf of Tampnet Inc., I certify that the information in this Supplement is in accordance with the provisions of Sections 1.16 and 1.5000(c)(1) of the Commission's rules, 47 C.F.R. § 1.16 and 1.5000(c)(1). In particular, Tampnet Inc. has calculated the ownership interests disclosed in the Supplement based upon its review of the Commission's rules. The interests disclosed satisfy each of the pertinent standards and criteria set forth in the rules.

Respectfully submitted,

/s/ Per Helge Svensson

Per Helge Svensson
Chief Executive Officer
Tampnet Inc.
Hinna Park, Stadionblokk C
Jåttåvågeien 7
4020 Stavanger
Norway
Tel: +47 908 03 803
Email: phs@tampnet.com