

October 22, 2021

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

*Re:* Petition of Onvoy Spectrum, LLC, Petitioner/Licensee, and Sinch US Holding Inc.,  
Petitioner/Transferee, for Declaratory Ruling Under Section 310(b)(4) of the  
Communications Act of 1934, as Amended, ISP-PDR-20210401-00006:

Dear Ms. Dortch:

This letter supplements the above-referenced Petition for Declaratory Ruling to correct certain arithmetic and typographical errors in the list of indirect 10-percent-or-greater interested holders of Sinch AB (publ). The updated percentages are identified in the attached Updated Exhibit A and Attachment 1 thereto, which supersede and replace the prior versions submitted with the Petition.<sup>1</sup> In addition, Attachment 1 to Exhibit A shows that Swedbank Robur holds a 6.2 percent voting and economic interest in Sinch AB (publ). Sinch AB (publ) is a Swedish public company and Swedbank Robur is an institutional investor that holds less than 10 percent of Sinch AB (publ)'s voting, equity securities. While Sinch AB (publ) is required to report beneficial ownership interests exceeding 5 percent, specific approval for Swedbank Robur's indirect ownership interest is not required pursuant to Section 1.5001(i)(3)(II)(A) of the Commission's rules. Finally, this letter clarifies that the only entity that holds a license subject to Section 310 is Onvoy Spectrum, LLC. Attachment 1 to Exhibit A has been updated to make clear that only Onvoy Spectrum, LLC holds a common carrier wireless license.

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<sup>1</sup> In Exhibit A item 7, a prior reference to 16.5 percent has been corrected to 14.8 percent; and in Exhibit A item 8, a prior reference to 7.2 percent has been corrected to 7.6 percent. Additional corrections to interests of below 5 percent are in Exhibit A items 13-19.



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John T. Nakahata  
Henry Shi  
HARRIS, WILTSHIRE & GRANNIS LLP  
1919 M Street N.W., 8<sup>th</sup> Floor  
Washington, D.C. 20036-3537  
Tel: (202) 730-1348  
[jnakahata@hwglaw.com](mailto:jnakahata@hwglaw.com)  
[hshi@hwglaw.com](mailto:hshi@hwglaw.com)

*Counsel for Transferee*

Respectfully submitted,

*/s/ Ronald W. Del Sesto, Jr.*

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Ronald W. Del Sesto, Jr.  
Brett P. Ferenchak  
Stephany Fan  
1111 Pennsylvania Ave., N.W.  
Washington, DC 20004-2541  
Tel: 202-739-3000  
Fax: 202-739-3001  
[ronald.delsesto@morganlewis.com](mailto:ronald.delsesto@morganlewis.com)  
[brett.ferenchak@morganlewis.com](mailto:brett.ferenchak@morganlewis.com)  
[stephany.fan@morganlewis.com](mailto:stephany.fan@morganlewis.com)

*Counsel for Transferor and Licensees*

**EXHIBIT A:**  
**LICENSEE’S POST-CLOSE OWNERSHIP AND CONTROL STRUCTURE**

Upon consummation of the Proposed Transaction, Authority Holders will have the following 10-percent-or-greater voting and economic interest holders:

1. *Name:* **Onvoy, LLC (“Onvoy”)**  
*Address:* 550 W. Adams St., Suite 900  
Chicago, IL 60661  
(855) 404-4768  
*Place of Organization:* Minnesota  
*Type of Organization:* Limited liability company  
*Principal Business:* Telecommunications  
*Interest Held:* Onvoy holds a 100-percent voting and equity interest in Licensee  
*Attributable Interest:* 100 percent voting and equity  
*Role:* Onvoy will directly control Onvoy Spectrum

2. *Name:* **Onvoy Intermediate Holdings Inc. (“Onvoy Intermediate”)**  
*Address:* 550 W. Adams St., Suite 900  
Chicago, IL 60661  
(855) 404-4768  
*Place of Organization:* Delaware  
*Type of Organization:* Corporation  
*Principal Business:* Holding company  
*Interest Held:* Onvoy Intermediate holds a 100-percent voting and equity interest in Onvoy  
*Attributable Interest:* 100 percent voting and equity  
*Role:* Onvoy Intermediate will indirectly control Onvoy Spectrum

3. *Name:* **Onvoy Holdings Inc. (“Onvoy Holdings”)**  
*Address:* 550 W. Adams St., Suite 900  
Chicago, IL 60661  
(855) 404-4768  
*Place of Organization:* Delaware  
*Type of Organization:* Corporation  
*Principal Business:* Holding company  
*Interest Held:* Onvoy Holdings holds a 100-percent voting and equity interest in Onvoy Intermediate  
*Attributable Interest:* 100 percent voting and equity  
*Role:* Onvoy Holdings will indirectly control Onvoy Spectrum

4. *Name:* **Sinch US Holding Inc. (“Sinch US”)**  
*Address:* One Alliance Center  
3500 Lenox Road NE  
Suite #1875  
Atlanta, GA 30326  
*Place of Organization:* Delaware

*Type of Organization:* Corporation  
*Principal Business:* Holding company  
*Interest Held:* Sinch US will hold a 100-percent voting and equity interest in Onvoy Holdings  
*Attributable Interest:* 100 percent voting and equity  
*Role:* Sinch US will exercise direct control over Onvoy Holdings and indirect control over Onvoy Spectrum; Sinch US will be the ultimate U.S.-organized parent company of Onvoy Spectrum

5. *Name:* **Sinch Holdings AB (“Sinch Holdings”)**  
*Address:* Lindhagensgatan 74  
 112 18 Stockholm  
 Sweden  
*Place of Organization:* Sweden  
*Type of Organization:* Aktiebolag (corporation)  
*Principal Business:* Holding company  
*Interest Held:* Sinch Holdings holds a 100-percent voting and equity interest in Sinch US  
*Attributable Interest:* 100 percent voting and equity  
*Role:* Sinch Holdings exercises direct control over Sinch US

6. *Name:* **Sinch AB (publ) (“Sinch”)**  
*Address:* Lindhagensgatan 74  
 112 18 Stockholm  
 Sweden  
*Place of Organization:* Sweden  
*Type of Organization:* Aktiebolag (corporation)  
*Principal Business:* Technology and telecommunications  
*Interest Held:* Sinch holds a 100-percent voting and equity interest in Sinch Holdings  
*Attributable Interest:* 100 percent voting and equity  
*Role:* Sinch will exercise ultimate control of Sinch US and Onvoy Spectrum

7. *Name:* **Neqst D2 AB (“Neqst D2”)**  
*Address:* c/o Neqst  
 Birger Jarlsgatan 9  
 111 45 Stockholm  
 Sweden  
*Place of Organization:* Sweden  
*Type of Organization:* Aktiebolag (corporation)  
*Principal Business:* Investments  
*Interest Held:* Neqst D2 AB holds a 14.8 percent interest voting and equity interest in Sinch AB  
*Attributable Interest:* 14.8 percent voting and equity

*Role:* Neqst D2 will have no role in the management of Sinch US or Onvoy Spectrum

8. *Name:* **Neqst D1 AB (“Neqst D1”)**  
*Address:* c/o Neqst  
Birger Jarlsgatan 9  
111 45 Stockholm  
Sweden  
*Place of Organization:* Sweden  
*Type of Organization:* Aktiebolag (corporation)  
*Principal Business:* Investments  
*Interest Held:* Neqst D1 holds a 51.5-percent voting and equity interest in Neqst D2  
*Attributable Interest:* 14.8 percent voting and 7.6 percent equity  
*Role:* Neqst D1 will have no role in the management of Sinch US or Onvoy Spectrum

9. *Name:* **Neqst 1 AB (“Neqst 1”)**  
*Address:* c/o Neqst  
Birger Jarlsgatan 9  
111 45 Stockholm  
Sweden  
*Place of Organization:* Sweden  
*Type of Organization:* Aktiebolag (corporation)  
*Principal Business:* Investments  
*Interest Held:* Neqst 1 holds an 83-percent voting and economic interest in Neqst D1  
*Attributable Interest:* 14.8 percent voting and 6.3 percent equity  
*Role:* Neqst 1 will have no role in the management of Authority Holders

10. *Name:* **Neqst 2017 AB (“Neqst 2017”)**  
*Address:* Birger Jarlsgatan 9  
111 45 Stockholm  
Sweden  
*Place of Organization:* Sweden  
*Type of Organization:* Aktiebolag (corporation)  
*Principal Business:* Investments  
*Interest Held:* Neqst 2017 holds a 100-percent voting and equity interest in Neqst 1  
*Attributable Interest:* 14.8 percent voting and 6.3 percent equity  
*Role:* Neqst 2017 will have no role in the management of Sinch US or Onvoy Spectrum

11. *Name:* **Neqst 2020 AB**  
*Address:* c/o Neqst

Birger Jarlsgatan 9  
 111 45 Stockholm  
 Sweden  
*Place of Organization:* Sweden  
*Type of Organization:* Aktiebolag (corporation)  
*Principal Business:* Investments  
*Interest Held:* Neqst 2020 AB holds a 100-percent voting and economic interest in Neqst.  
*Attributable Interest:* 14.8 percent voting and 3.6 percent equity  
*Role:* Neqst 2020 AB will have no role in the management of Sinch US or Onvoy Spectrum

12. *Name:* **Neqst Investment 2020 AB**  
*Address:* c/o Neqst  
 Birger Jarlsgatan 9  
 111 45 Stockholm  
 Sweden  
*Place of Organization:* Sweden  
*Type of Organization:* Aktiebolag (corporation)  
*Principal Business:* Investments  
*Interest Held:* Neqst Investment holds a 57.6 percent economic and 39.5% voting interest in Neqst 2020 AB.  
*Attributable Interest:* 14.8 percent voting and 3.6 percent equity  
*Role:* Neqst Investment 2020 AB will have no role in the management of Sinch US or Onvoy Spectrum

13. *Name:* **Neqst 4AD1 AB (“Neqst 4AD1”)**  
*Address:* c/o Neqst  
 Birger Jarlsgatan 9  
 111 45 Stockholm  
 Sweden  
*Place of Organization:* Sweden  
*Type of Organization:* Aktiebolag (corporation)  
*Principal Business:* Investments  
*Interest Held:* Neqst 4AD1 holds a 17 percent economic and voting interest in Neqst D1.  
*Attributable Interest:* 2.5 percent voting and 1.3 percent equity  
*Role:* Neqst 4AD1 will have no role in the management of Authority Holders

14. *Name:* **Neqst 4A AB (“Neqst 4A”)**  
*Address:* c/o Neqst  
 Birger Jarlsgatan 9  
 111 45 Stockholm  
 Sweden  
*Place of Organization:* Sweden

*Type of Organization* Aktiebolag (corporation)  
*Principal Business:* Investments  
*Interest Held:* Neqst 4A holds a 100-percent economic and voting interest in Neqst 4AD1.  
*Attributable Interest:* 2.5 percent voting and 1.3 percent equity  
*Role:* Neqst 4A will have no role in the management of Authority Holders

15. *Name:* **Neqst Investment 4A AB (“Neqst Investment 4A”)**  
*Address:* c/o Neqst  
 Birger Jarlsgatan 9  
 111 45 Stockholm  
 Sweden  
*Place of Organization:* Sweden  
*Type of Organization* Aktiebolag (corporation)  
*Principal Business:* Investments  
*Interest Held:* Neqst Investment 4A holds a 58 percent economic and voting interest in Neqst 4A.  
*Attributable Interest:* 2.5 percent voting and <1.0 percent equity  
*Role:* Neqst Investment 4A will have no role in the management of Authority Holders

16. *Name:* **Kersgården AB (“Kersgården”)**  
*Address:* c/o Jonas Fredriksson  
 Hermelinstigen 6  
 167 57 Bromma  
 Sweden  
*Place of Organization:* Sweden  
*Type of Organization* Aktiebolag (corporation)  
*Principal Business:* Investments  
*Interest Held:* Kersgården holds a 25 percent equity and 26.4 percent voting interest in each of Neqst Investment 4A and Neqst Investment 2020  
*Attributable Interest:* 14.8 percent voting and 1.0 percent equity (through joint control, together with Sundaskären AB, of Neqst Investment 2020 and Neqst Investment 4A)  
*Role:* Kersgården will have no role in the management of Authority Holders

17. *Name:* **Jonas Fredriksson**  
*Address:* Hermelinstigen 6  
 167 57 Bromma  
 Sweden  
*Citizenship:* Sweden  
*Principal Business:* Investments

*Interest Held:* Mr. Fredriksson holds a 100 percent economic and voting interest in Kersgården  
*Attributable Interest:* 14.8 percent voting and 1.0 percent equity (joint control indirectly through Kersgården, together with Sundaskären AB, of Neqst Investment 2020 and Neqst Investment 4A)  
*Role:* Mr. Fredriksson will have no role in the management of Authority Holders

18. *Name:* **Sundaskären AB (“Sundaskären”)**  
*Address:* c/o Erik Fröberg  
Strandvägen 11  
182 60 Djursholm  
Sweden  
*Place of Organization:* Sweden  
*Type of Organization:* Aktiebolag (corporation)  
*Principal Business:* Investments  
*Interest Held:* Sundaskären holds a 56.1 percent economic and 49.9 percent voting interest in each of Neqst Investment 4A and Neqst Investment 2020  
*Attributable Interest:* 14.8 percent voting and 2.5 percent equity (joint control, together with Kersgården, of Neqst Investment 2020 and Neqst Investment 4A)  
*Role:* Sundaskären will have no role in the management of Sinch US or Onvoy Spectrum

19. *Name:* **Erik Fröberg**  
*Address:* Strandvägen 11  
182 60 Djursholm  
Sweden  
*Citizenship:* Sweden  
*Principal Business:* Investments; executive management  
*Interest Held:* Mr. Fröberg holds a 100-percent voting and economic interest in Sundaskären  
*Attributable Interest:* 14.8 percent voting and 2.5 percent equity (joint control indirectly through Sundaskären, together with Kersgården AB, of Neqst Investment 2020 and Neqst Investment 4A)  
*Role:* Mr. Fröberg currently serves as Chairman of Sinch

20. *Name:* **Capital Group Research and Management Co. (“CGRM”)**  
*Address:* 333 S Hope Street  
55th Floor  
Los Angeles, CA 90071  
*Place of Organization:* Delaware  
*Principal Business:* Investment management  
*Interest Held:* CGRM, through its affiliated investment management companies, serves as the investment manager of mutual funds



that collectively hold beneficial and legal title to approximately 12.7 percent of the shares in Sinch AB, none of which have a disclosable interest in Sinch and Authority Holders.  
*Attributable Interest:* 12.7 percent voting and 0 percent equity  
*Role:* CGRM will have no role in the management of Authority Holders.

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21. *Name:* **Capital Group Companies, Inc. (“CGC”)**  
*Address:* 333 S Hope Street  
55th Floor  
Los Angeles, CA 90071  
*Place of Organization:* Delaware  
*Principal Business:* Financial services  
*Interest Held:* CGC wholly owns CGRM and other certain affiliated investment management companies that manage and control funds collectively holding beneficial and legal title to a 13.4 percent interest in Sinch, none of which have a disclosable interest in Authority Holders.  
*Attributable Interest:* 13.4 percent voting and 0 percent equity  
*Role:* CGC will have no role in the management of Authority Holders.

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22. *Name:* **SB Northstar LP**  
*Address:* c/o Walkers Corporate Limited  
Cayman Corporate Centre  
27 Hospital Road  
Grand Cayman, Cayman Islands KY1-9008  
*Place of Organization:* Cayman Islands  
*Principal Business:* Investments  
*Interest Held:* 10.8 percent interest in Sinch AB (publ)  
*Attributable Interest:* 10.8 percent  
*Role:* SB Northstar LP will have no role in the management of Authorization Holders

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23. *Name:* **SB Management Ltd**  
*Address:* 9<sup>th</sup> Floor, Al Sila Tower  
ADGM Swuare, Al Maryah Island  
Abu Dhabi C0 NA  
*Place of Organization:* United Arab Emirates  
*Principal Business:* Investments  
*Interest Held:* 100 percent voting interest in SB Northstar LP  
*Attributable Interest:* 10.8 percent voting and 0 percent equity  
*Role:* SB Management Ltd. will have no role in the management of Authorization Holders

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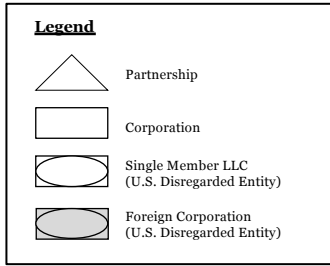
24. *Name:* **SoftBank Group Corp.**  
*Address:* 1-7-1 Kaigan, Minato-ku  
Tokyo 105-7537

*Place of Organization:* Japan  
*Principal Business:* Holding company  
*Interest Held:* SoftBank Group Corp. holds a 100-percent voting and economic interest in SB Management Ltd. and holds a 66-percent economic and voting interest in three Delaware limited liability companies that collectively own 100-percent of the economic and voting interest in SB Northstar LP<sup>2</sup>  
*Attributable Interest:* 10.8% voting interest and 7.1 equity interest  
*Role:* SoftBank Group Corp will have no management role in the Authorization Holders

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<sup>2</sup> Delaware Project 1, LLC; Delaware Project 2, LLC; and Delaware Project 3, LLC.

# Post-Close Ownership Structure of Licensee



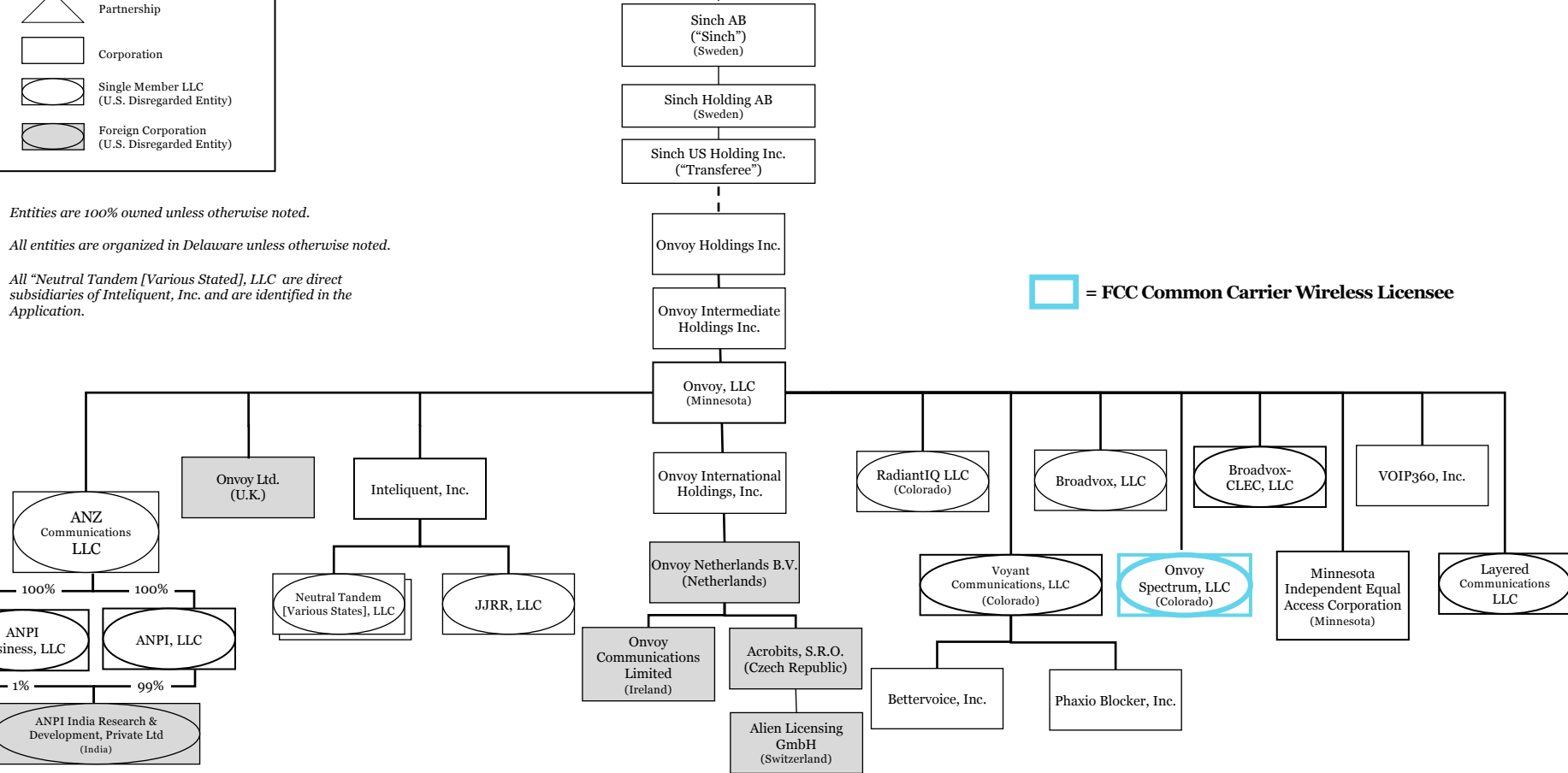
Entities are 100% owned unless otherwise noted.

All entities are organized in Delaware unless otherwise noted.

All "Neutral Tandem [Various Stated], LLC are direct subsidiaries of Inteliquent, Inc. and are identified in the Application.

 = FCC Common Carrier Wireless Licensee

See Page 10 for Ownership of Sinch



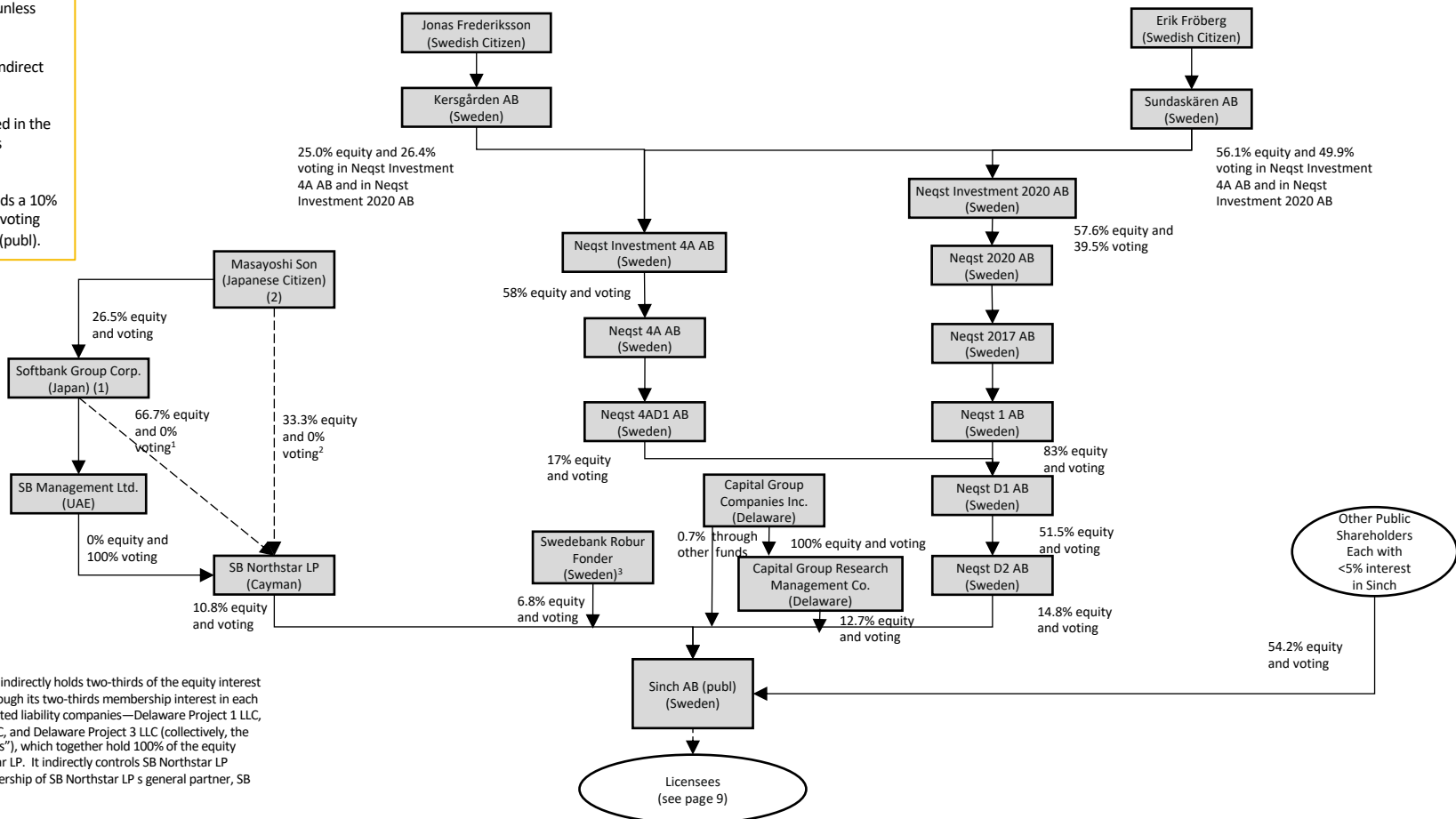
# Post-Close Ownership Structure of Licensee Ownership of Sinch AB (Publ)

Interests are 100% unless otherwise indicated

Dash lines indicate indirect interest.

Entities are organized in the United States unless otherwise indicated

No other person holds a 10% of greater equity or voting interest in Sinch AB (publ).



1. Softbank Group Corp. indirectly holds two-thirds of the equity interest in SB Northstar LP through its two-thirds membership interest in each of three Delaware limited liability companies—Delaware Project 1 LLC, Delaware Project 2 LLC, and Delaware Project 3 LLC (collectively, the “Delaware Project LLCs”), which together hold 100% of the equity interest in SB Northstar LP. It indirectly controls SB Northstar LP through its 100% ownership of SB Northstar LP’s general partner, SB Management Ltd.

2. Masayoshi Son indirectly holds one-third of the equity interest in SB Northstar LP through his ownership of one-third of the membership interests in each of the Delaware Project LLCs, which together hold 100% of the equity interest in SB Northstar LP.

3. Sinch AB (publ) is a Swedish public company and Swedebank Robur is an institutional investor that holds less than 10 percent of Sinch AB (publ) s voting, equity security. Sinch AB (publ) is required to report beneficial ownership interests in excess of 5 percent. Accordingly, specific approval for Swedebank Robur s indirect ownership interest is not required pursuant to Section 1.5001(i)(3)(I)(A) of the Commission s rules.