

April 27, 2021

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, D.C. 20002

*Re: Petition of Onvoy Spectrum, LLC, Petitioner/Licensee, and Sinch US Holding Inc., Petitioner/Transferee, for Declaratory Ruling Under Section 301(b)(4) of the Communications Act of 1934, as Amended, File No. ISP-PDR-20210401-00006*

Dear Ms. Dortch:

This letter supplements the above-referenced petition for declaratory ruling ("Petition"). First, the Petitioners amend the Petition to designate Onvoy, LLC as the controlling U.S.-organized parent of the Licensee, instead of Sinch US Holding Inc. as originally designated in the Petition. Second, the supplement provides information on additional indirect interest holders of Sinch AB (publ) and corrects the percentage calculations of certain indirect equity interests held in Sinch. The updated and corrected information is set out in attached Updated Exhibit A and Updated Exhibit D, which respectively supersede Exhibit A and Exhibit D to the Petition.

Respectfully submitted,

/s/ John T. Nakahata

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## **UPDATED EXHIBIT A:**

### **LICENSEE'S POST-CLOSE OWNERSHIP AND CONTROL STRUCTURE**

Upon consummation of the Proposed Transaction, Licensee will remain a wholly-owned subsidiary of Onvoy, LLC ("Onvoy"), which in turn will remain a wholly-owned subsidiary of Onvoy Intermediate Holdings Inc. ("Onvoy Intermediate"), itself wholly owned by Onvoy Holdings Inc. ("Onvoy Holdings"). Voting and equity interests in Onvoy Holdings will be owned 100-percent by Sinch US Holding Inc. ("Sinch US"), a direct, wholly-owned subsidiary of Sinch Holding AB ("Sinch Holding"), which is in turn a direct, wholly-owned subsidiary of Sinch AB (publ) ("Sinch"). Sinch is a publicly traded company listed on the Nasdaq Stockholm AB.

Please see Attachment 1 for diagrams illustrating the pre- and post-close ownership structures of Licensee.

#### **1. POST-CLOSE OWNERSHIP STRUCTURE**

Upon consummation of the Proposed Transaction, Licensee will have the 10-percent-or-greater direct and indirect voting and equity interest holders identified below.

All equity and voting interests are calculated pursuant to 47 C.F.R. § 1.5002(a) and (b), respectively, with voting interests coupled with control (including negative control) treated as interests of 100 percent. Interests identified as attributable interests are indirect interests in Licensee that the holders are deemed to have pursuant to the Commission's rules.

### Licensee 10-Percent-or-Greater 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 is the controlling U.S.-organized parent and 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
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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
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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 exercises control of Sinch US and will exercise ultimate control of Onvoy Spectrum
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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 16.5 percent interest voting and equity interest in Sinch AB  
*Attributable Interest:* 17 percent voting and equity  
*Role:* Neqst D2 will have no role in the management of Sinch US or Onvoy Spectrum
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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:* 17 percent voting and 9 percent equity  
*Role:* Neqst D1 will have no role in the management of Sinch US or Onvoy Spectrum
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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 equity interest in Neqst D1  
*Attributable Interest:* 17 percent voting and 7 percent equity  
*Role:* Neqst 1 will have no role in the management of Sinch US or Onvoy Spectrum
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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:* 17 percent voting and 7 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 equity interest in Neqst.  
*Attributable Interest:* 17 percent voting and 4 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 39. percent voting and 57.6 percent equity interest in Neqst 2020 AB.  
*Attributable Interest:* 17 percent voting and 4 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 voting and equity interest in Neqst D1.  
*Attributable Interest:* 3 percent voting and 1 percent equity  
*Role:* Neqst 4AD1 will have no role in the management of Sinch US or Onvoy Spectrum

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 voting and equity interest in Neqst 4AD1.  
*Attributable Interest:* 3 percent voting and 1 percent equity  
*Role:* Neqst 4A will have no role in the management of Sinch US or Onvoy Spectrum

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 voting and equity interest in Neqst 4A.  
*Attributable Interest:* 3 percent voting and 1 percent equity  
*Role:* Neqst Investment 4A will have no role in the management of Sinch US or Onvoy Spectrum

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 26.4 percent voting and and 25 percent equity interest in each of Neqst Investment 4A and Neqst Investment 2020  
*Attributable Interest:* 17 percent voting and 1 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 Sinch US or Onvoy Spectrum

17. *Name:* **Jonas Fredriksson**  
*Address:* Hermelinstigen 6  
167 57 Bromma  
Sweden  
*Citizenship:* Sweden  
*Principal Business:* Investments  
*Interest Held:* Mr. Fredriksson holds a 100 percent voting and equity interest in Kersgården  
*Attributable Interest:* 17 percent voting and 1 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 Sinch US or Onvoy Spectrum




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 49.9 percent voting and 56.2 percent equity interest in each of Neqst Investment 4A and Neqst Investment 2020  
*Attributable Interest:* 17 percent voting and 3 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 equity interest in Sundaskären  
*Attributable Interest:* 17 percent voting and 3 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


Other than the interest holders identified above, no other entity or individual will, upon consummation of the Proposed Transaction, hold a 10-percent or greater direct or indirect interest in Sinch US and Licensee.


CURRENT OWNERSHIP STRUCTURE OF LICENSEE

**Legend**

 Partnership

 Corporation

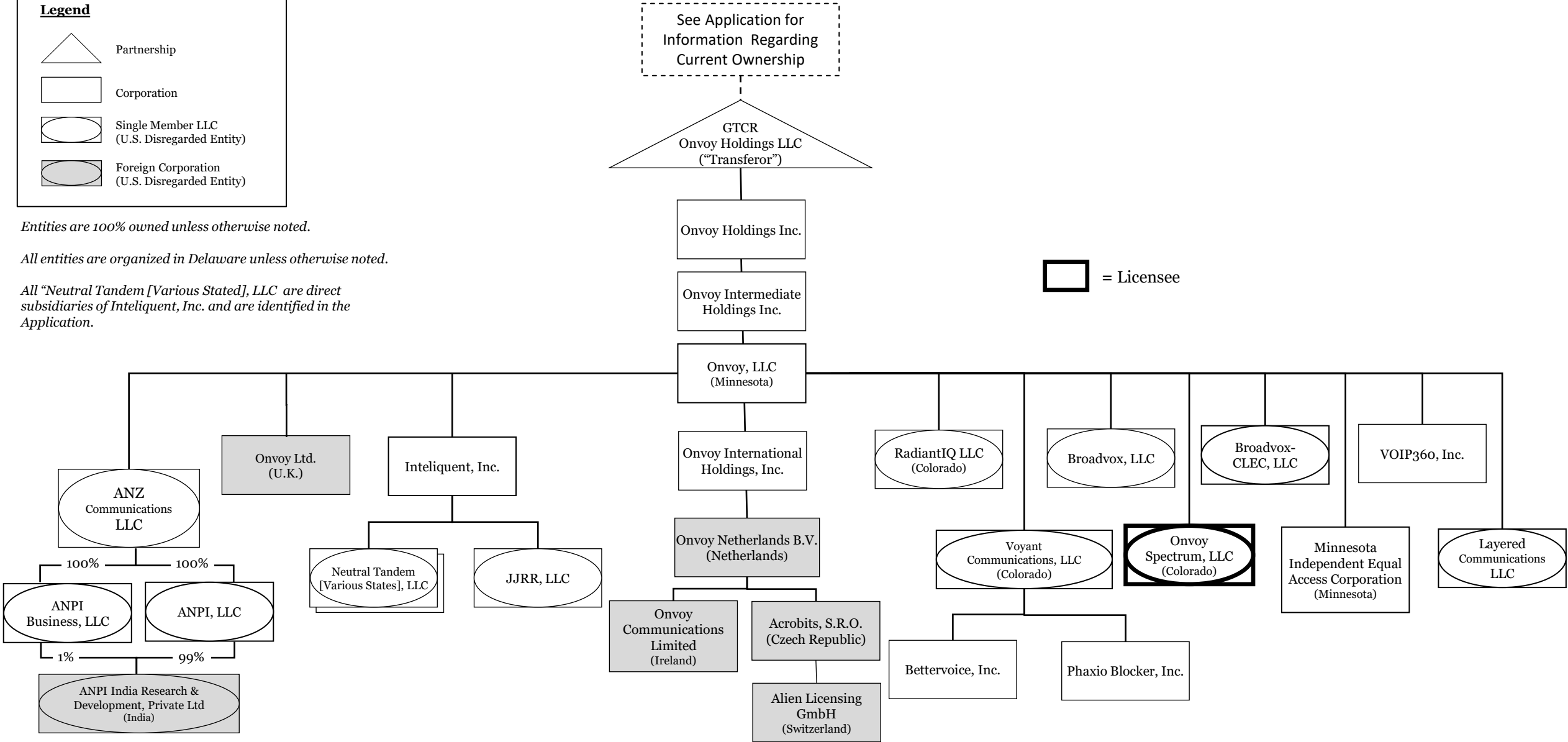
 Single Member LLC (U.S. Disregarded Entity)

 Foreign Corporation (U.S. Disregarded Entity)

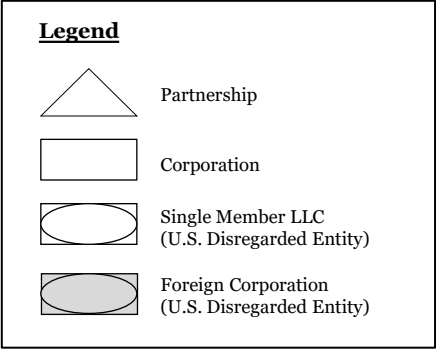
Entities are 100% owned unless otherwise noted.

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.



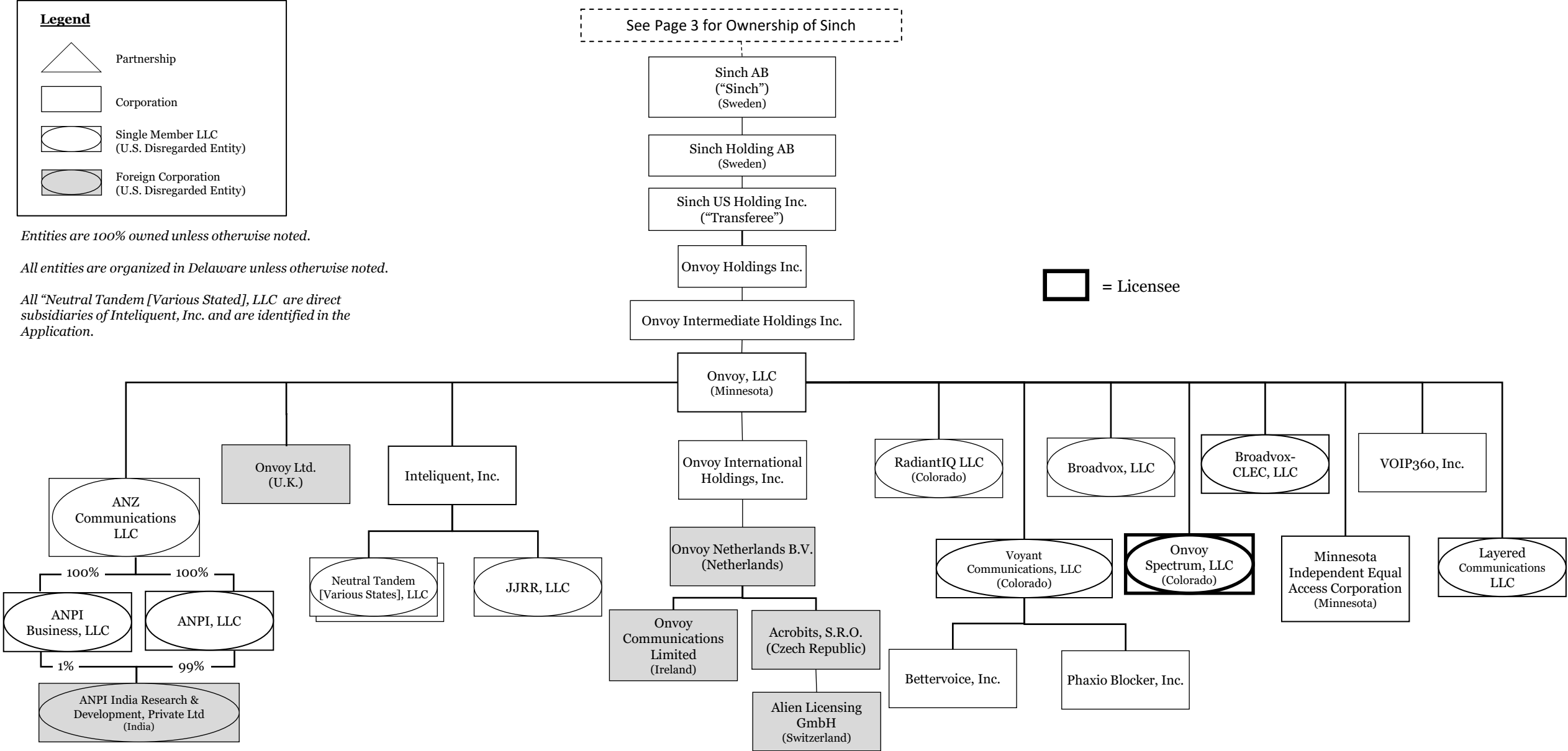
POST-CLOSING OWNERSHIP STRUCTURE OF LICENSEE



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.



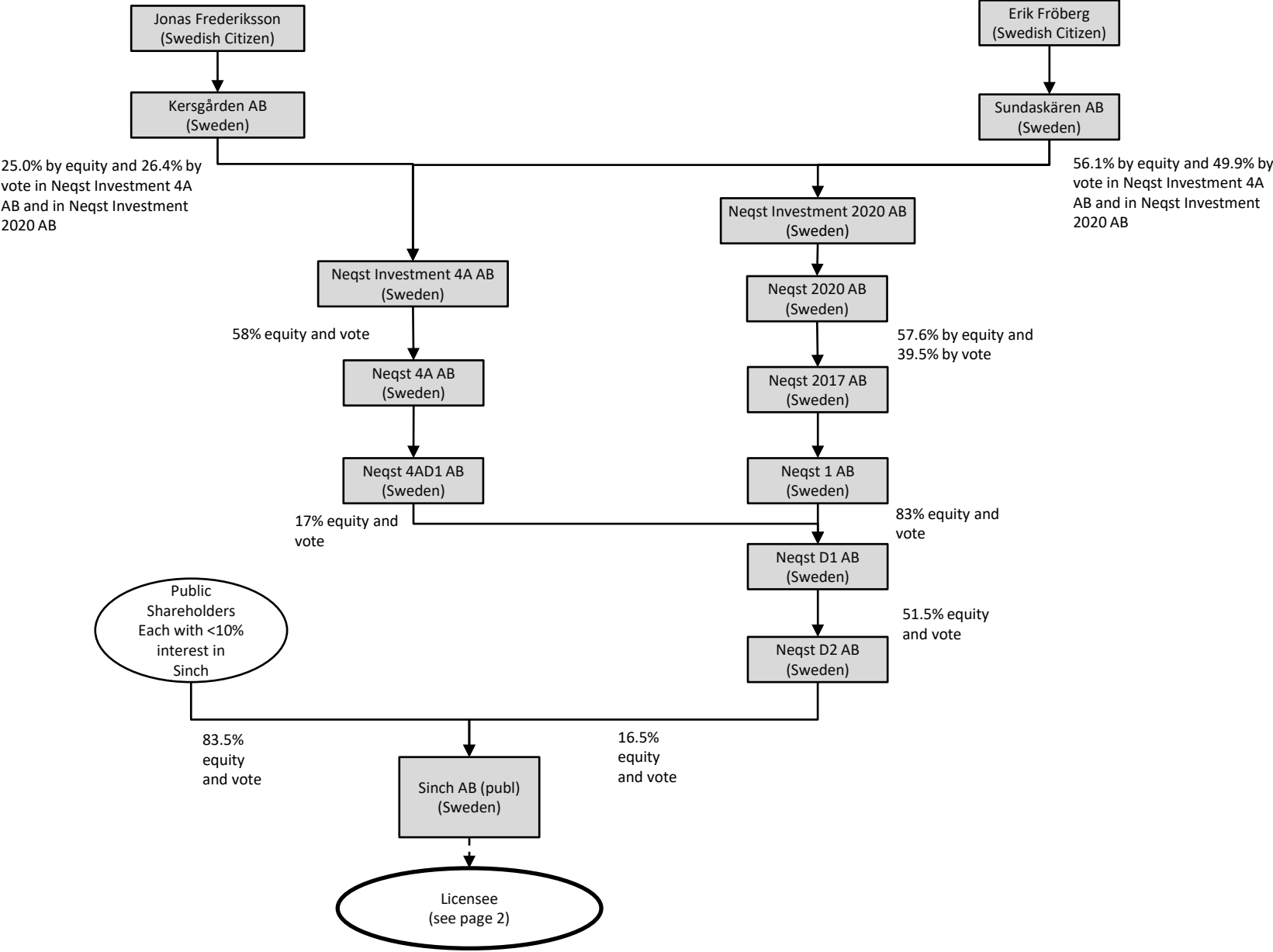
POST-CLOSING OWNERSHIP STRUCTURE OF LICENSEE(OWNERSHIP OF SINCH AB (publ))

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).



**UPDATED EXHIBIT D:**

**REQUESTS FOR SPECIFIC APPROVAL**

Table D-1 below identifies the entities and individuals requiring specific approval, their respective projected equity and/or deemed voting percentages, and the equity and/or deemed voting percentages for which Petitioners are seeking specific approval.

**TABLE D-1: FOREIGN INVESTOR ENTITIES FOR APPROVAL**

<b>Name of Entity</b>	<b>Jurisdiction of Organization / Citizenship</b>	<b>Projected Equity % (Rounded)</b>	<b>Projected Voting % (Rounded)</b>	<b>Maximum Equity %<sup>1</sup></b>	<b>Maximum Voting %<sup>2</sup></b>
Sinch Holding AB	Sweden	100	100	100	100
Sinch AB (publ)	Sweden	100	100	100	100
Neqst D2 AB	Sweden	17	17	49.9	49.9
Neqst D1 AB	Sweden	9	17	49.9	49.9
Neqst 1 AB	Sweden	7	17	49.9	49.9
Neqst 2017 AB	Sweden	7	17	49.9	49.9
Neqst 2020 AB	Sweden	4	17	49.9	49.9
Neqst Investment 2020 AB	Sweden	4	17	49.9	49.9
Sundaskären AB	Sweden	3	17	49.9	49.9
Erik Fröberg	Sweden	3	17	49.9	49.9
Kersgården AB	Sweden	1	17	49.9	49.9
Jonas Frederiksson	Sweden	1	17	49.9	49.9
SB Northstar LP <sup>3</sup>	Cayman Islands	10	10	49.9	49.9
SB Management Ltd. <sup>4</sup>	United Arab Emirates	0	10	49.9	49.9
Project Delaware 1 LLC <sup>5</sup>	Delaware	3	10	49.9	49.9
Project Delaware 2 LLC <sup>5</sup>	Delaware	3	10	49.9	49.9

<sup>1</sup> The percentages in this column represent the maximum percentage of equity for which Petitioners are seeking specific approval for the listed entities to hold.

<sup>2</sup> The percentages in this column represent the maximum percentage of voting interest for which Petitioners are seeking specific approval for the listed entities to hold or to be deemed to hold.

<sup>3</sup> SB Northstar LP holds a direct 9.8 percent voting and equity interest in Sinch AB.

<sup>4</sup> SB Management Ltd. is the general partner of SB Northstar LP, in which it holds a 100 percent voting and 0 percent equity interest. SB Management Ltd. is 100 percent directly owned by Softbank Group Corp.

<sup>5</sup> Project Delaware 1 LLC, Project Delaware 2 LLC, and Project Delaware 3 LLC are the limited partners in SB Northstar LP and each owns one-third of the equity interest therein.

<b>Name of Entity</b>	<b>Jurisdiction of Organization / Citizenship</b>	<b>Projected Equity % (Rounded)</b>	<b>Projected Voting % (Rounded)</b>	<b>Maximum Equity %<sup>1</sup></b>	<b>Maximum Voting %<sup>2</sup></b>
Project Delaware 3 LLC <sup>5</sup>	Delaware	3	10	49.9	49.9
Softbank Group Corp. <sup>6</sup>	Japan	7	10	49.9	49.9
Masayoshi Son <sup>7</sup>	Japan	5	10	49.9	49.9

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<sup>6</sup> Softbank Group Corp. indirectly controls SB Northstar LP through its 100 percent ownership of SB Northstar LP's general partner, SB Management Ltd., and accordingly holds a 9.8 percent indirect voting interest in Sinch AB. Softbank Group Corp. indirectly owns two-thirds of the equity interest in SB Northstar LP through its two-thirds membership interest in each of Project Delaware 1 LLC, Project Delaware 2 LLC, and Project Delaware 3 LLC, and accordingly holds a 6.5 percent indirect equity interest in Sinch AB.

<sup>7</sup> Masayoshi Son holds a 26.5 percent voting and equity interest in SoftBank Group Corp., and also 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 Project Delaware 1 LLC, Project Delaware 2 LLC, and Project Delaware 3 LLC. SB Northstar LP in turn holds a 9.8 percent direct voting and equity interest in Sinch AB. Thus, Mr. Son's combined indirect equity interest in Sinch AB through his indirect interest in SB Northstar LP (3.2 percent) and direct interest Softbank Group Corp. (1.7%), is 4.99 percent.