

May 7, 2021

VIA ELECTRONIC FILING

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

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 further supplements the above-referenced petition for declaratory ruling (“Petition”). First, attached is an updated Attachment 1 to Exhibit A, revised to include certain direct and indirect owners of Sinch AB (publ), each of whose ownership interest is less than 10 percent, but for whom the Petition seeks specific approval under 47 C.F.R. § 1.5001(i). Second, Petitioners substitute the attached updated Exhibit D, which replaces the updated Exhibit D filed with the supplement filed on April 27, 2021.

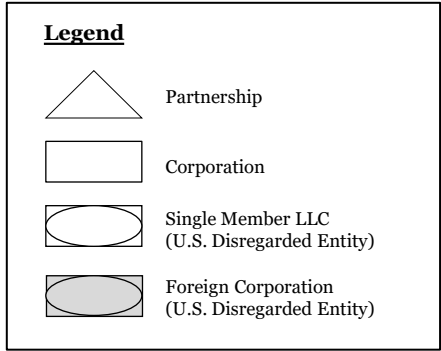
Respectfully submitted,

/s/ John T. Nakahata

John T. Nakahata
Henry Shi
Daniel Tingley
HARRIS, WILTSHIRE & GRANNIS LLP
1919 M Street NW 8th Floor
Washington, DC 20036-3537
Tel: (202) 730-1320
Fax: (202) 730-1301
Email: jnakahata@hwglaw.com

Counsel for Transferee

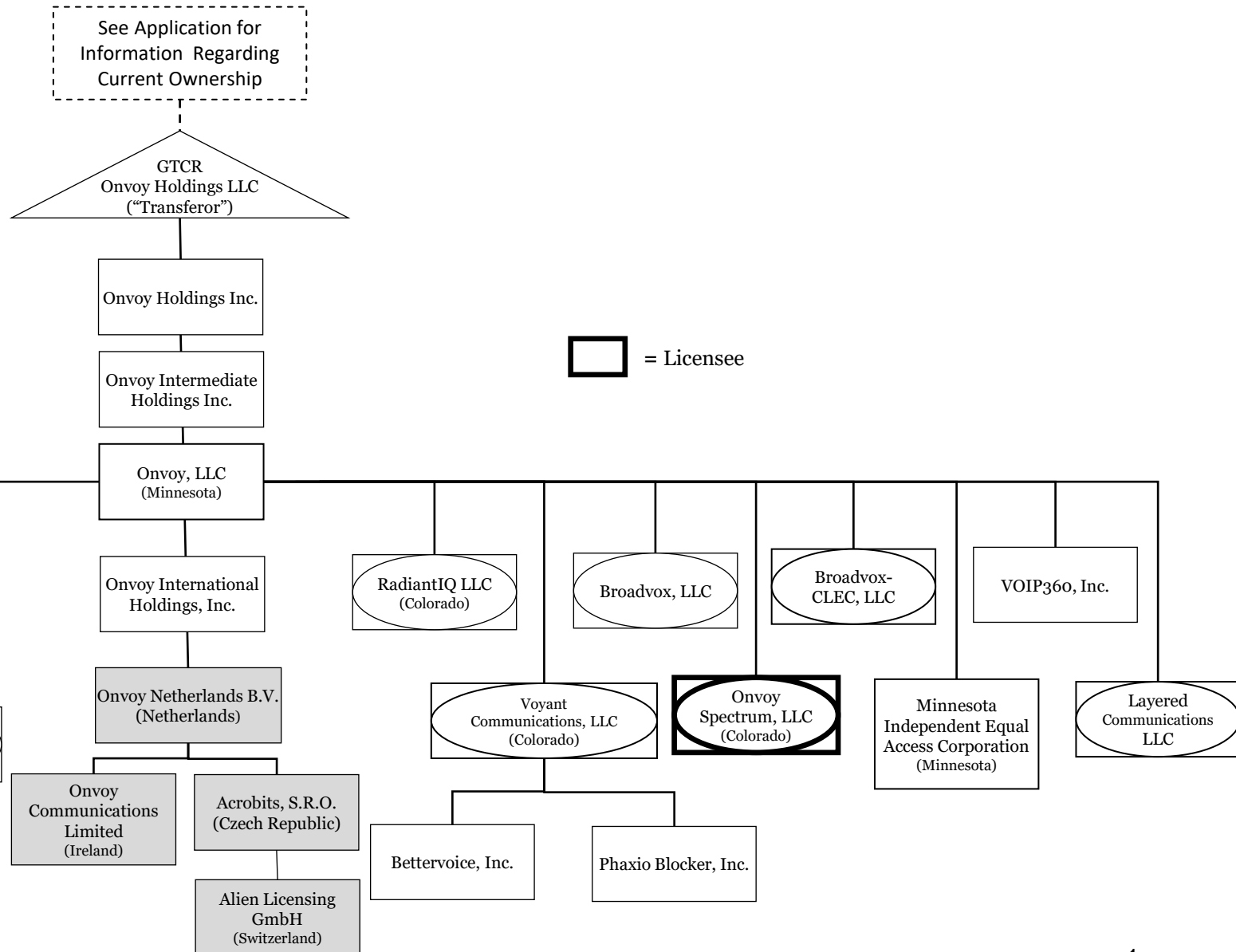
CURRENT OWNERSHIP STRUCTURE OF LICENSEE




Entities are 100% owned unless otherwise noted.

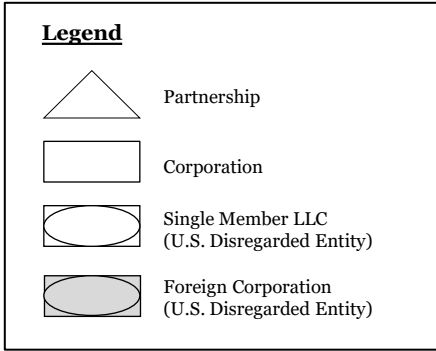
All entities are organized in Delaware unless otherwise noted.

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



 = Licensee

POST-CLOSING OWNERSHIP STRUCTURE OF LICENSEE

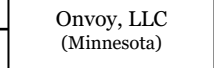
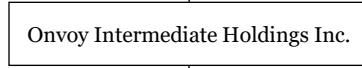
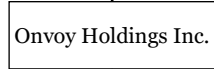
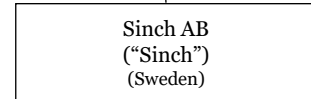



Entities are 100% owned unless otherwise noted.

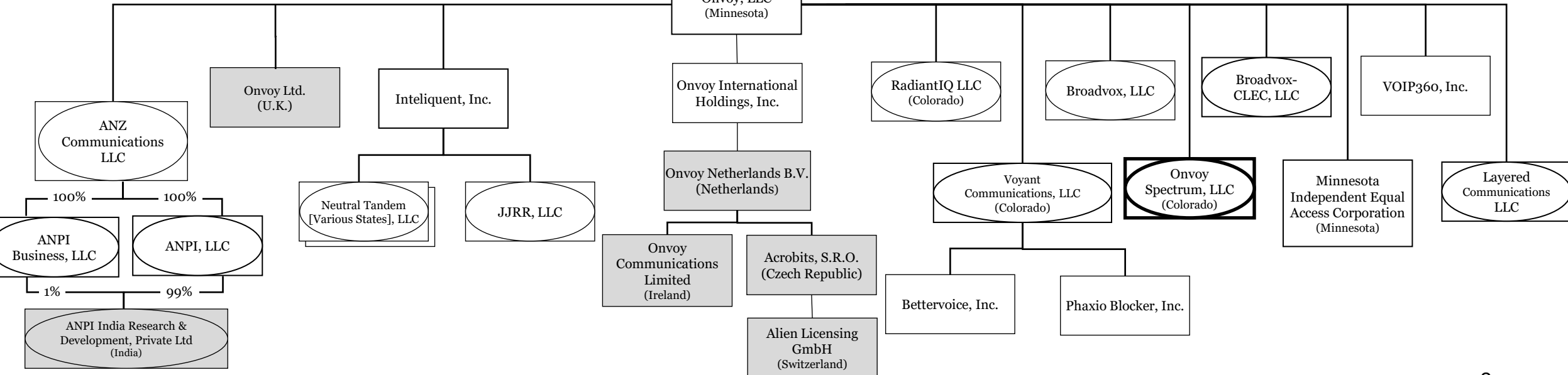
All entities are organized in Delaware unless otherwise noted.

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

See Page 3 for Ownership of Sinch



 = Licensee



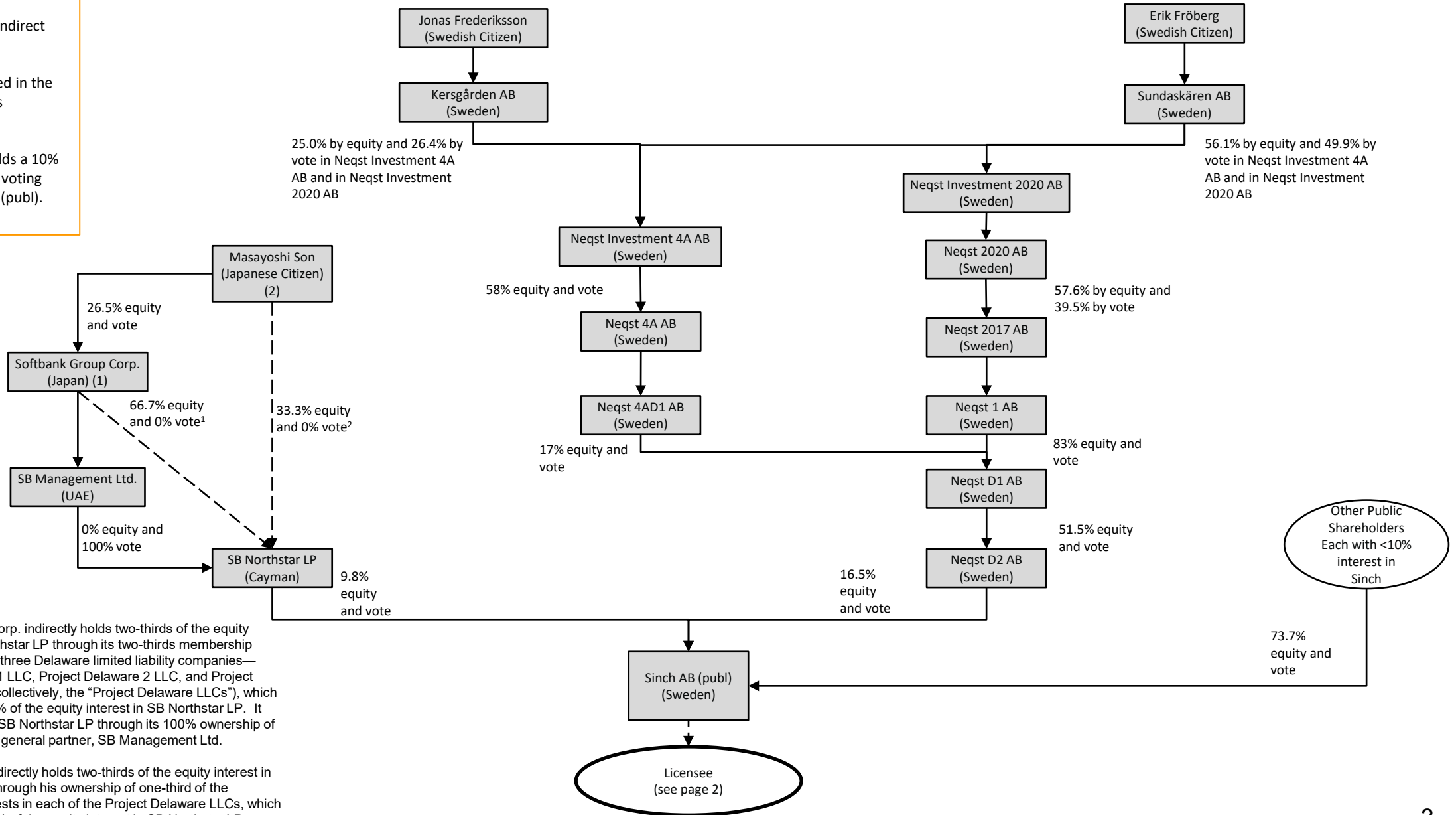
Interests are 100% unless otherwise indicated

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).

POST-CLOSING OWNERSHIP STRUCTURE OF LICENSEE(OWNERSHIP OF 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—Project Delaware 1 LLC, Project Delaware 2 LLC, and Project Delaware 3 LLC (collectively, the “Project Delaware 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 two-thirds of the equity interest in SB Northstar LP through his ownership of one-third of the membership interests in each of the Project Delaware LLCs, which together hold 100% of the equity interest in SB Northstar LP.

**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

Name of Entity	Jurisdiction of Organization / Citizenship	Projected Equity % (Rounded)	Projected Voting % (Rounded)	Maximum Equity %¹	Maximum Voting %²
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 ³	Cayman Islands	10	10	49.9	49.9
SB Management Ltd. ⁴	United Arab Emirates	0	10	49.9	49.9

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

² 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.

³ SB Northstar LP holds a direct 9.8 percent voting and equity interest in Sinch AB. The limited partners of SB Northstar LP are three Delaware limited liability companies, Project Delaware 1 LLC, Project Delaware 2 LLC, and Project Delaware 3 LLC (collectively, the “Project Delaware LLCs”), each of which owns a one-third equity interest in SB Northstar LP.

⁴ 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.

Name of Entity	Jurisdiction of Organization / Citizenship	Projected Equity % (Rounded)	Projected Voting % (Rounded)	Maximum Equity %¹	Maximum Voting %²
Softbank Group Corp. ⁵	Japan	7	10	49.9	49.9
Masayoshi Son ⁶	Japan	5	10	49.9	49.9

⁵ 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 the Project Delaware LLCs—and accordingly holds a 6.5 percent indirect equity interest in Sinch AB.

⁶ 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 the Project Delaware LLCs. 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.