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August 8, 2012

**BY ELECTRONIC SUBMISSION**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
Attn: International Bureau  
445 12th Street, S.W.  
Washington, DC 20554

Re: PERSEUS TELECOM USA LLC; Revised Attachment 2

Dear Secretary Dortch:

Please find enclosed a revised Attachment 2 for PERSEUS TELECOM USA LLC's International Section 214 Application (File No. ITC-214-20120702-00172). The only revision to Attachment 2 is to the address for Perseus Technology Holdings USA, Inc., which has recently changed.

Please contact the undersigned if you have any questions or require any additional information.

Sincerely,

*/s/ Cheng-yi Liu*  
Counsel for PERSEUS TELECOM  
USA LLC

Enclosure

cc: Adrienne Downs ([adrienne.downs@fcc.gov](mailto:adrienne.downs@fcc.gov))

**ATTACHMENT 2**

**Response to Question 14**

Section 63.18(h) The following individuals or entities hold, directly or indirectly, a ten percent (10%) or greater ownership interest in PERSEUS TELECOM USA LLC (“Applicant”):

The following entity holds a ten percent (10%) or greater direct ownership in Applicant:

<b>Name/Address</b>	<b>% of shares</b>	<b>Country of Formation</b>	<b>Principal Occupation/Business</b>
<b>Perseus Technology Holdings USA, Inc.</b> 30 Vesey Street 14 <sup>th</sup> Floor New York, NY 10007	99% direct ownership of PERSEUS TELECOM USA LLC	Delaware, U.S.A	Holding Company

The following entity holds a ten percent (10%) or greater direct ownership in Perseus Technology Holdings USA, Inc.:

<b>Name/Address</b>	<b>% of shares</b>	<b>Country of Formation</b>	<b>Principal Occupation/Business</b>
<b>Perseus Telecom Limited</b> 1 <sup>st</sup> Floor Riverview House 21-23 City Quay Dublin 2, Ireland	100% direct ownership of Perseus Technology Holdings USA, Inc.	Ireland	Telecommunications

The following individual holds a ten percent (10%) or greater direct ownership in Perseus Telecom Limited:

<b>Name/Address</b>	<b>% of shares</b>	<b>Citizenship</b>	<b>Principal Occupation/Business</b>
<b>Dr. Jock Percy</b> 100 Jane Street Apt 5B New York, NY 10014	100 % direct ownership of Perseus Telecom Limited	United Kingdom	Telecommunications

Dr. Jock Percy also holds a 1% direct ownership interest in Applicant. Together with his 99% indirect ownership interest, Dr. Jock Percy effectively controls 100% of the ownership interest in Applicant. No other individual or entity holds a ten percent (10%) or greater ownership interest in Applicant.

**Response to Question 14 (continued)**

Section 63.18(h) Interlocking directorates: Dr. Jock Percy, Applicant's CEO, is also the CEO and Director of Perseus Telecom Limited.<sup>1</sup> There are no additional interlocking directorates between PERSEUS TELECOM USA LLC and any other foreign carrier.

**Response to Question 15**

Section 63.18(d) Applicant has not previously received authority under Section 214 of the Act. However, Applicant's indirect parent company, Perseus Telecom Limited, has previously received authority under Section 214 of the Act to provide services authorized under Sections 63.18(e)(1) and 63.18(e)(2) of the Commission's rules.<sup>2</sup>

Section 63.18(e)(3) Applicant requests no authorizations other than those under Sections 63.18(e)(1) and 63.18(e)(2) of the Commission's rules. Applicant certifies that it will comply with the terms and conditions contained in Sections 63.21, 63.22 and 63.23 of the Commission's rules.

Section 63.18(g) Not Applicable.

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<sup>1</sup> Perseus Telecom Limited previously received authority under Section 214 of the Act to provide services authorized under Sections 63.18(e)(1) and 63.18(e)(2) of the Commission's rules. See File No. ITC-214-20100115-00020; *International Authorizations Granted*, Public Notice, Report No. TEL-01444, DA 10-1417 (rel. July 29, 2010).

<sup>2</sup> *Id.*