

**AMENDMENTS TO RESPONSES TO
DOJ TRIAGE QUESTIONS**

Company Name: Snail Mobile, LLC) FCC Application #ITC-214-20150324-00077
Company Address: 12049 Jefferson) Place of Incorporation: California
Boulevard, Culver City, CA 90230)

By this submission, Snail Mobile, LLC amends its prior responses to triage inquiries, which responses were dated May 13, 2015; June 12, 2015 and December 9, 2015.

Responses submitted on May 13, 2015 are changed only as follows. For purposes of clarity, both questions and answers are provided:

A. Section 1, question 2;

Identify the total number of current employees, and planned number of employees for the next 12 months.

Snail Mobile, LLC currently has only one employee: Mr. Jim Shun Tsai. It plans to employ a between 5 - 10 employees in the state of California over the next 12 months.

B. Section I, question 4;

What access control/security policies are in place for your production network?

Snail Mobile, LLC intends to resell domestic and international wireless data and cellular services of existing major wireless carriers in the United States. As such, the Applicant control/security policies will be provided to the Applicants customers by its underlying wholesale facilities based providers.

C. Section I, question 5;

What encryption products/technologies have been installed on the production network?

Snail Mobile, LLC intends to resell domestic and international wireless data and cellular services of existing major wireless carriers in the United States. As such, the Applicant will rely on its underlying carrier for encryption products and technologies.

D. Section I, question 8;

Provide all addresses of the present and anticipated physical locations for all of the Applicant's network equipment and infrastructure, whether owned or leased.

The company is seeking only Global Resale Authority. It does not own or lease any network equipment and/or infrastructure.

E. Section II, question 3 (a) and (b);

For each member of the Applicant's senior management team, list the names (where applicable) of the CEO (Chief Executive Officer), President, CFO (Chief Financial Officer), CIO (Chief Information Officer), CTO (Chief Technical Officer), COO (Chief Operating Officer), Senior VPs, and any other positions involved in exercising day-to-day management responsibilities:

- a) Explain the nature and extent of each senior manager's involvement in the company; and **Mr. Jim Shun Tsai is the Applicant's Vice President. He is the highest level manager with the Applicant. He is responsible for all areas of operations with the company. He is the sole employee of the Applicant.**
- b) Provide each senior manager's name, citizenship, date and place of birth, U.S. alien number (if applicable), passport identifying information (including number and country), all residence address, all business addresses and all phone numbers.

Name – Jim Shun Tsai

Citizenship – United States of America

Date and place of birth – January 23, 1959, Taiwan

U.S. alien number (if applicable) – Not Applicable

Passport identifying information (US passport – 493226280)

All residence addresses:

4337 Marina City Drive, Unit 647

Marina Del Rey, CA 90292

All business addresses:

12049 Jefferson Boulevard

Culver City, CA 90230

All phone numbers:

310-928-7426 telephone

310-526-6512 facsimile

F. Section II, question 4;

Identify a senior officer or employee (U.S. citizen or legal alien residing in the U.S. with an active security clearance or able to obtain one) who will be the Applicant's authorized

law enforcement point of contact responsible for accepting and overseeing compliance with subpoenas/court orders/search warrants including responding to official requests and/or compulsory processes from U.S. law enforcement or other U.S. government agencies.

Mr. Jim Shun Tsai
12049 Jefferson Boulevard
Culver City, CA 90230
310-928-7426 telephone
310-526-6512 facsimile

- G. Section II, question 5 (b);
Provide all addresses of locations where such records will be stored and/or remotely accessed/managed via electronic systems.

All records will be stored, accessed and managed at:
12049 Jefferson Boulevard
Culver City, CA 90230

- H. Section II, question 7;
Describe the customer base of the Applicant company (business, residential, carrier, enterprise, etc.).

Through this Section 214 application, Snail Mobile, LLC seeks authority from the Federal Communications Commission (FCC) to provide Global Resale Services in accordance with 47 C.F.R. §63.18 (e)(2) of the FCC's Rules. Snail Mobile seeks to provide MVNO and MVNE services to Snail Games USA's online video gaming customers and to the general public in the United States so that end-user consumers may have the opportunity to play online video games on smartphone, wireless, cellular devices. Snail Mobile, LLC's provision of MVNO and MVNE services to end-user customers will be accomplished by Snail Mobile, LLC reselling domestic and international wireless data and cellular services of existing major wireless carriers in the United States.

- I. Section IV, question 2;
What kind of network infrastructure will be utilized to deliver the service(s)?

The Applicant is currently in negotiations with carriers to use as its interconnecting wholesale carrier.

Changes to Triage responses submitted on May 22, 2015

J. Question 3;

The applicant states plans to operate as a MVNO/MVNE but the applicant has filed for both a Resale and Facilities-Based Service license. Please explain plans for use of the Facilities-Based license.

Applicant has submitted a supplement to its pending Section 214 application to remove its initial request to provide facilities-based service --- it has no plans to provide such service, and or to seek authority to do so. Applicant's Section 214 Application pending with the FCC now only requests Global or Limited Global Resale Authority.

K. Question 5;

In response to question #5 (a) and (b), pages 8 & 9, the applicant states that subscriber data will be stored at 12049 Jefferson Boulevard, Culver City, CA 90230. Where will the applicant store Call Detail Records (CDR) and/or Customer Proprietary Network Information (CPNI) records?

All subscriber data, including all CDRs and CPNI records will be stored at 12049 Jefferson Boulevard, Culver City, CA 90230. All user log-in data will be stored at either the same location in Culver City, or a server company, such as Equinix or Amazon Web server.

L. Question 7;

In response to question #4, page 11, the applicant states "Not Applicable" for network equipment or infrastructure. As an MVNO/MVNE, the applicant will require equipment and/or a network to offer telecom services. Please provide a connectivity diagram that describes provisioning, billing, payment processing, records transmission, storage and other activities required to provide telecom services to end users and connect to Verizon or other carriers.

Please see Response to DR Nos. 2 and 4. Until negotiations are complete, Applicant does not have this information available. At this time there are no negotiations with Verizon.

Changes to triage responses submitted on December 8, 2015

M. Question 1;

In the interim period since the follow-up questions of July 2015, has the applicant completed negotiations with Verizon or other carrier, to provide MVNO services? If so, please provide a copy of the agreement.

No, and at this time there are no ongoing negotiations with Verizon.

N. Question 2;

Have there been any changes to information provided in the application or in response to triage questions? Please update the information as necessary.


No, except as set forth above.

Closing Statement

Making materially false, fictitious, or fraudulent statements or representations may render the Applicant subject to fines and/or imprisonment under 18 U.S.C. § 1001.

I declare that the foregoing is true and correct to the best of my knowledge.

Executed this 3/10/2017 day of _____, year of 2017.

X 

(Applicant Signature)