

TrustComm Solutions LLC
Application for International Section 214 Authorization
May 28, 2015
Attachment 2 -- Response to Items 14-15 of IBFS Main Form Application

Item 14 – Direct and Indirect Ownership of Applicant

The direct ownership of TrustComm Solutions LLC (“TSLLC”) is as follows:

Name:	TrustComm Solutions Holdings, Inc.
Address:	800 Corporate Drive Suite 421 Stafford, VA 22554
Citizenship:	Delaware corporation
Principal Business:	International Telecommunications and Broadband Services
Ownership:	100%

TrustComm Solutions Holdings, Inc. is 100% owned by the Nox Trust, an irrevocable Delaware trust (the “Trust”). The grantor of the Nox Trust is Reiner Mario Lemme (“Grantor”), a citizen of the Federal Republic of Germany, and the Trust has been created for the benefit of Mr. Lemme and his children and more remote descendants.

The Commonwealth Trust Company, a corporation organized under the laws of Delaware and headquartered in Wilmington, Delaware is the corporate trustee of the Trust. Kevin J. Lederer, William G. Wade, and Guy M. Adams, each a United States citizen, are the non-corporate trustees of the Trust (collectively, the “Non-Corporate Trustees”). As corporate trustee, the Commonwealth Trust Company is responsible for administrative matters, such as corporate and tax filings. The Non-Corporate Trustees have authority to control investment and distribution decisions with respect to the Trust. The Non-Corporate Trustees can only be removed for cause, and only by the protector of the Trust. The Grantor has the power under the Trust to nominate successor Non-Corporate Trustees in the event that a Non-Corporate Trustee resigns, dies, or becomes incapacitated.

The protector, Ivan A. Sacks, who is and under the Trust must be a U.S. citizen, acts as an irrevocable proxy for the beneficiaries of the Trust. As the initial protector, Mr. Sacks was appointed by the Grantor; however, the protector has the power to appoint his own successor.

There are no other entities with 10% or greater in direct or indirect ownership of TSLLC, and TSLLC has no interlocking directorates with any foreign carriers.

Item 15 – Section 63.18(d), (e)(3) and (g) Information

Section 63.18(d) – TSLLC has not previously received international service authority under Section 214 of the Act. TSLLC’s ultimate 100% owner, the Nox Trust, is also the ultimate 100% owner of TrustComm, Inc., holder of a Section 214 authorization (ITC-214-19990211-00083) to provide facilities-based communications services pursuant to Section 63.18(e)(1).

Section 63.18(e)(3) – Not applicable.

Section 63.18(g) – Not applicable.