

January 19, 2016

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Attn: Competition Policy Division  
Wireline Competition Bureau

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Adrienne McNeil  
International Bureau Policy Division

**Re: WC Docket No. 16-11**

**and**

**IBFS File No. ITC-214-20150918-00222**

**Supplement to Sangoma U.S., Inc.'s Request for Domestic Section 214 Transfers of Control Authority and International and Domestic Special Temporary Authority**

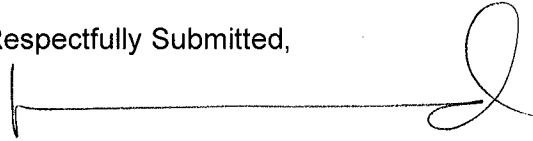
Dear Mrs. Dortch:

Pursuant to a January 13, 2013 request from the FCC Wireline Competition Bureau ("WCB"), Sangoma U.S., Inc. ("Sangoma U.S.") respectfully submits this supplement to Attachment 3 of its Request for Domestic Section 214 Transfers of Control Authority and International and Domestic Special Temporary Authority. The supplement provides further information, as requested by the FCC WCB, on the corporate structure of the individuals and entities that have a ten percent or more equity ownership in Sangoma U.S.; overlap between the customers, services, and territories for SIPStation Inc. ("SIPStation") and Rockbochs Inc. ("Rockbochs") prior to acquisition; and confirmation that neither SIPStation, nor Rockbochs, were ILECs in their pre-acquisition service territories.

Sangoma U.S. is simultaneously submitting this supplemental filing with both the FCC International Bureau and the FCC WCB, in accordance with the Commission's rules. Please do not hesitate to contact us if you require additional information.

Sangoma U.S., Inc.  
January 19, 2016  
Page 2

Respectfully Submitted,



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**Attorneys for Sangoma U.S., Inc.**

cc: Adrienne McNeil, FCC International Bureau Policy Division  
David Moore, CFO, Sangoma U.S., Inc.  
Philippe Lindheimer, Manager of Software Development, Sangoma U.S., Inc.  
Tony Lewis, General Manager, Sangoma U.S., Inc.  
Samantha Maqueo, Consultant, GSAssociates

Pursuant to a request from the FCC Wireline Competition Bureau, Sangoma U.S., Inc. hereby submits this supplement to its Request for Domestic Section 214 Transfers of Control Authority and International and Domestic Special Temporary Authority.

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554

In the Matter of )  
 )  
Sangoma U.S., Inc. )  
 ) WC Docket No 16-11  
Supplement to the Application for Authorization )  
Pursuant to Section 214 of the )  
Communications Act of 1934, as Amended, )  
For Transfer of Control )

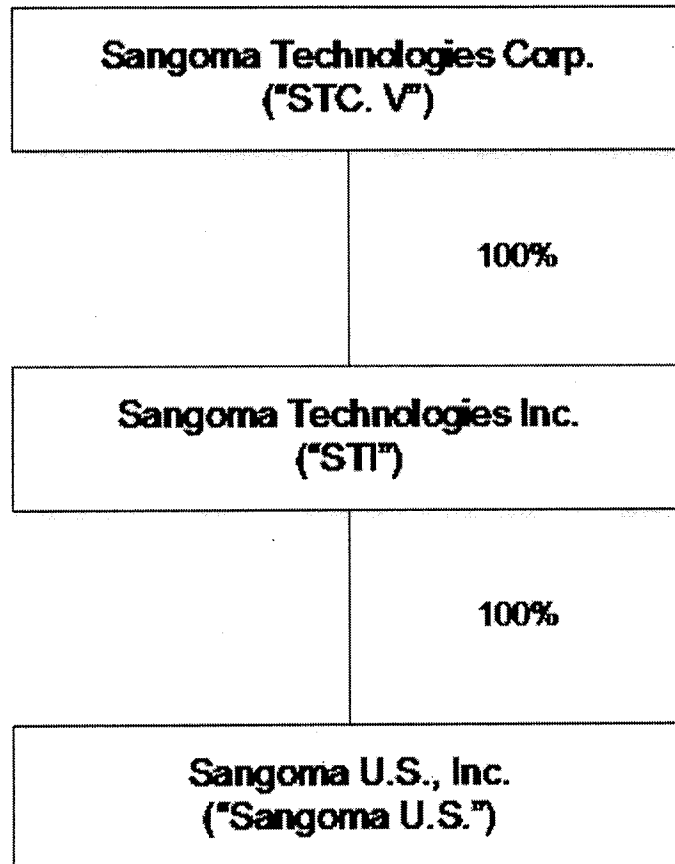
**SUPPLEMENT TO  
APPLICATION FOR DOMESTIC TRANSFER OF CONTROL**

Sangoma U.S., Inc. ("Sangoma U.S."), by its undersigned counsel, pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, Section 63.04 of the rules of the Federal Communications Commission ("FCC" or "Commission"), 47 C.F.R. § 63.04, and in response to a January 13, 2016 request from the FCC Wireline Competition Bureau ("WCB"), hereby submits this supplement to its Application for Authorization Pursuant to Section 214 of the Communications Act of 1934, as Amended, For Transfers of Control, as filed with the FCC WCB on December 23, 2015.

**I. Supplemental Information Regarding Corporate Structure and Individuals and Entities that Have a Ten Percent or More Equity Ownership in Sangoma U.S.**

Sangoma Technologies Corp. ("STC.V"), is a public holding company with a single 100% owned subsidiary Sangoma Technologies Inc. ("STI"), through which all of STC.V's business is conducted. STC.V has one 10% or more individual shareholder, Mr. David Mandelstam, a Canadian citizen, who holds an estimated 16.3% interest in STC.V. STI holds 100% of Sangoma U.S. Since the ownership between STC.V, STI, and Sangoma U.S. is 100% in each case, there are certain parts of the prior filing where we noted that STC.V is the ultimate parent of Sangoma U.S.

The above explanation is depicted in the following organizational chart:<sup>1</sup>



**II. Supplemental Information Regarding Overlap Between the Customers, Services, and Territories For SIPStation, Inc. ("SIPStation") and Rockbochs, Inc. ("Rockbochs") Prior to Acquisition.**

In Item 7 of the December 23, 2015 Application for Domestic Transfer of Control, Sangoma U.S. described the geographic areas in which SIPStation and Rockbochs operated, and the services they provided, prior to acquisition by Sangoma U.S. In pertinent part, that description stated that:

Rockbochs: Rockbochs provided nationwide fax-over-IP monthly service, and telecommunications equipment and software to support that service.

SIPStation: SIPStation was established to provide nationwide integrated SIP trunking service.

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<sup>1</sup> Note that STC.V is a Canadian publicly held company of which Mr. Mandelstam holds an estimated 16.3% equity interest, with an estimated 83.7% equity interest being publicly held. Mr. Mandelstam is the only equity holder of STC.V with a more than 10% equity interest.

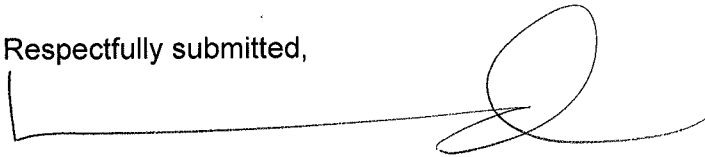
Sangoma U.S. clarifies that there was no product or customer overlap between SIPStation and Rockbochs prior to (or after) the acquisition. SIPStation provides only a SIP trunking service, while Rockbochs provides a fax store and forward service that requires a physical device to be sent to and activated at the customer site. Both companies had the ability to provide their services throughout the United States, and there were some states in which both companies had customers. However, being small, each company only had actual customers in a limited number of states and even in the states where both companies had customers, they provided completely different services. This situation did not change after the acquisition of the companies by Sangoma U.S. and both companies have retained the same pre-acquisition sales teams.

**III. Supplemental Information Regarding ILEC Status of Sangoma U.S., SIPStation, and Rockbochs.**

On January 13, 2016, the FCC WCB inquired as to whether SIPStation or Rockbochs were ILECs in their service territories prior to their acquisition. Sangoma U.S. confirms that neither Rockbochs, nor SIPStation, were ILECs prior to their acquisition. Moreover, none of Rockbochs, SIPStation, nor Sangoma U.S., are ILECs post-acquisition.

In light of the supplemental information provided in this filing, Sangoma U.S. respectfully requests that the Commission promptly grant its Application for Domestic Transfer of Control and corresponding Request for Special Temporary Authority.

Respectfully submitted,



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**Attorneys for Sangoma U.S., Inc.**

Dated: January 19, 2016