

## **Attachment B**

Swisstok Telnet USA, Inc. (“Swisstok Telnet USA” or “Applicant”) provides the following information required by Section 63.18 of the Commission’s rules, 47 C.F.R. § 63.18, with respect to its Application for authority to provide international telecommunications services:

1. Section 63.18(d): Swisstok Telnet USA has not previously sought or received Section 214 authority from the Commission.
2. Section 63.18(e): Swisstok Telnet USA is applying for authority to operate as a facilities-based carrier pursuant to the terms and conditions of Section 63.18(e)(1) of the Commission’s Rules, 47 C.F.R. §63.18 (e)(1), and as a resale carrier pursuant to the terms and conditions of Section 63.18(e)(2) of the Commission's Rules, 47 C.F.R. § 63.18(e)(2). Swisstok Telnet USA requests authority to serve all countries permitted under a grant of global authority. As evidenced by the certification provided in **Attachment A**, Swisstok Telnet USA will comply with the terms and conditions contained in Sections 63.21, 63.22 and 63.23 of the Commission’s Rules. 47 C.F.R. §§ 63.21-23. At this time, Applicant does not seek authority to provide services not referenced under paragraphs (e)(1) and (e)(2) of Section 63.18 of the Commission’s Rules. 47 C.F.R. § 63.18(e)(1)-(2).
3. Section 63.18(g): Swisstok Telnet USA will use previously authorized facilities to provide the services requested by the Application. Consequently, Swisstok Telnet USA is categorically excluded from environmental assessment pursuant to Section 1.1306 of the Commission’s Rules. 47 C.F.R. § 1.1306.
4. Section 63.18(h): The following entities or persons directly or indirectly hold 10% or more of an ownership interest in Swisstok Telnet USA:

Name: Swisstok Telnet Global AG  
Business Address: 1 c/o CO-Handelszentrum GmbH Haldenstrasse 5, 6340 Baar, Switzerland  
Citizenship: Switzerland  
Ownership Interest: 100% owner of Swisstok Telnet USA  
Principal Business: Communications Services

Name: United Cloud Holdings Limited  
Business Address: Kestrel Court, Harbour Road, Portishead, Bristol, BS20 7AN, UK  
Citizenship: United Kingdom  
Ownership Interest: 100% owner of Swisstok Telnet Global AG  
Principal Business: Holding Company

Name: Telelogic Mind Foundation  
Business Address: Landstrasse 140, 9494 Schaan, Lichtenstein  
Citizenship: Liechtenstein  
Ownership Interest: 50% owner of United Cloud Holdings Limited  
Principal Business: Non-profit, Private Foundation

Name: ICK GAYRIMENKUL VE OTOMOTIV TIGARET ANONIM SIRKETI  
Business Address: COBANCESME MERKEZ MAH.29 EKIM CAD.16,  
BANCELIEVLER, ISTANBUL, TURKEY  
Citizenship: Turkey  
Ownership Interest: 50% owner of United Cloud Holdings Limited  
Principal Business: Real Estate

Name: Valery Benaguev  
Business Address: Ha-hermon 9b, Rishon Le Zion, 75238  
Citizenship: Israel  
Ownership Interest: 100% owner of Telelogic Mind Foundation  
Principal Business: Beneficiary of Telelogic Mind Foundation

Name: Cebrail Karaarslan  
Business Address: SENLIKOY MAH. OTLUKBELI SOK., ASLI APT. BLOK NO  
54/2, BAKIRKOY, INSTABUL, TURKEY  
Citizenship: Turkey  
Ownership Interest: 50% owner of ICK GAYRIMENKUL VE OTOMOTIV TIGARET  
ANONIM SIRKETI  
Principal Business: Real Estate

Name: Ismail Karaarslan  
Business Address: SENLIKOY MAH. OTLUKBELI SOK. ASLI APT. BLOK NO 54/3,  
BAKIRKOY, ISTANBUL, TURKEY  
Citizenship: Turkey  
Ownership Interest: 50% owner of ICK GAYRIMENKUL VE OTOMOTIV TIGARET  
ANONIM SIRKETI  
Principal Business: Real Estate

Please refer to **Exhibit 1** for a chart of the Applicant's ownership structure. No other person or entity can assert a 10% or more ownership interest in Swisstok Telnet USA.

# EXHIBIT 1

