



05/23/2017

FCC S 214 Filing – Attachment 2

Response to Question 14 of License Application

[Section 63.18(h)] In Attachment 2, provide the name, address, citizenship and principal business of the applicant's ten percent or greater direct and indirect shareholders or other equity holders, and identify any interlocking directorates.

There are two relevant shareholders that are required to be reported as per § 63.18(h):

1. Shareholder 1 – Ownership of 85% of Zero Technologies Inc.
 - a. Muneebuddin Mohammed
 - b. Unit 1306, 2-14 Albert Road,
South Melbourne, Victoria 3205 Australia
 - c. Australian Citizen
 - d. Principle business is located in Melbourne, Australia. Business activities include software development, sales and marketing

2. Shareholder 2 – Ownership of 10% of Zero Technologies Inc.
 - a. Peter J Billings
 - b. 205 William Street,
Melbourne, Victoria 3000 Australia
 - c. Australian Citizen
 - d. Principle business is practice as an attorney with Victoria Bar

No interlocking directorates for any shareholders.

Response to Question 15 of License Application

In Attachment 2, respond to paragraphs (d), (e)(3) and (g) of Section 63.18.

Response to § 63.18 (d)

§ 63.18 requires the following types of entities to seek authority by formal application:

“Except as otherwise provided in this part, any party seeking authority pursuant to Section 214 of the Communications Act of 1934, as amended, to construct a new line, or acquire or operate any line, or engage in transmission over or by means of such additional line for the provision of common carrier communications services between the United States, its territories or possessions, and a foreign point shall request such authority by formal application.”

The applicant submits that it does not intend to, nor is seeking authority to, construct a new line, or acquire or operate any line, or engage in transmissions over or by means of such additional line for the provision of common carrier communications services.

The applicant further submits that it is seeking authority to operate as a Mobile Virtual Network Operator (MVNO) whereby purchasing wholesale wireless mobile services from a US based facilities carrier on a white labeling arrangement and on-selling it to consumers in California.

**Response to § 63.18 (e)(3)**

Other authorizations. *“If applying for authority to acquire facilities or to provide services not covered by paragraphs (e)(1) and (e)(2) of this section, the applicant shall provide a description of the facilities and services for which it seeks authorization. The applicant shall certify that it will comply with the terms and conditions contained in §§63.21 and 63.22 and/or 63.23, as appropriate. Such description also shall include any additional information the Commission shall have specified previously in an order, public notice or other official action as necessary for authorization”.*

The applicant submits that it intends to provide re-billed cellular services to consumers in California as a MVNO. These services will be purchased through a wholesale agreement, to be concluded, with a facilities based US carrier. The applicant seeks authorization to re-sell the wholesale services acquired using the “white-label” selling model.

The applicant certifies that it will comply with the terms and conditions contained in §§63.21 and 63.22 and/or 63.23, where appropriate.

Response to § 63.18 (g)

Where the applicant is seeking facilities-based authority under paragraph (e)(3) of this section, a statement whether an authorization of the facilities is categorically excluded as defined by §1.1306 of this chapter. If answered affirmatively, an environmental assessment as described in §1.1311 of this chapter need not be filed with the application.

The applicant does not seek any facilities based authority under paragraph § 63.18 (e)(3). Therefore, no statement or declaration is required pursuant to §§ 1.1306 and 1.1306.