

August 13, 2018

VIA IBFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Room TW-B204
Washington, D.C. 20554

Re: *Supplement to International Section 214 Application*
IB Docket No. ITC-214-2017-0728-00131

Dear Ms. Dortch:

Rebtel Networks AB (“Rebtel”), by its undersigned counsel, supplements the above-referenced application for international Section 214 authority. Specifically, Rebtel updates the ownership information provided in response to Question 14 of the application to reflect a recent pro forma internal reorganization undertaken by the company. The reorganization did not change the ultimate ownership or control of Rebtel. For the Commission’s convenience, the enclosed organizational charts also show Rebtel’s ownership prior to and after the internal reorganization.

Answer to Question 14:

The applicant, Rebtel, is a wholly-owned direct subsidiary of Rebtel Partners AB (“Rebtel Partners”), a newly formed private limited company organized under the laws of Sweden. The principal business of Rebtel Partners is holding company, and its address is Jakobsbergsgatan 16, SE-111 44, Stockholm, Sweden.

Rebtel Holding AB (“Rebtel Holding”) holds approximately 70 percent of the equity of Rebtel Partners. Rebtel Holding is a private limited company organized under the laws of Sweden, and its principal business is holding company. Its address is Jakobsbergsgatan 16, SE-111 44, Stockholm, Sweden.

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Rebtel Owners AB (“Rebtel Owners”), a private limited company organized under the laws of Sweden, hold approximately 87.3 percent of the equity of Rebtel Holding. The principal business of Rebtel Owners is holding company, and its address is Jakobsbergsgatan 16, SE-111 44, Stockholm, Sweden. Certain employees and management collectively hold approximately 12.7 percent of the equity of Rebtel Holding, none of whom individually hold more than a 1.5 percent interest in Rebtel Holding.

Hjalmar Winbladh, through his wholly-owned Swedish holding company FHW Holding AB, holds approximately 18.5 percent of the equity of Rebtel Owners. Mr. Winbladh is a Swedish citizen. The address for Mr. Winbladh and his holding company is Risvägen 48, 132 27 Saltsjö-Boo, Sweden.

Jonas Lindroth, through his wholly-owned Swedish holding companies Highwave Consulting AB and WindWave AB, holds approximately 16.3 percent of the equity of Rebtel Owners. Mr. Lindroth is a Swedish citizen. The address for Mr. Lindroth and his holding companies are Tomtebogatan 26a, 113 38 Stockholm, Sweden.

Index Venture Associates III Limited (“Index Venture Associates”), a venture capital firm, holds through various investment funds approximately 15.7 percent of the equity of Rebtel Owners. Of those investment funds, only Index Ventures III (Delaware) L.P. (“Index Ventures Delaware”) holds ten percent or more (approximately 10.3 percent) of the equity of Rebtel Owners. Index Venture Associates is the general partner of Index Ventures Delaware. Index Venture Associates is formed under the laws of the Channel Islands. Index Ventures Delaware is formed under the laws of the state of Delaware. The following individuals are directors of Index Venture Associates: Ian Henderson, Nigel Greenwood and David Hall (all citizens of Great Britain), Sinéad Meehan (a citizen of Ireland), and Bernard Dallé (a citizen of Switzerland). The address of these entities and individuals is P.O. Box 641, St. Helier Jersey, JE 8YJ Channel Islands.

Balderton Capital II, L.P. (“Balderton Capital”) holds approximately 15.7 percent of the equity of Rebtel Owners. Balderton Capital Partners II, L.P. (“Balderton Partners”) is the general partner of Balderton Capital. Balderton Capital General Partner II, L.L.C. (“Balderton General Partner”) is the general partner of Balderton Partners. Balderton Capital, Balderton Partners, and Balderton General Partner are investment funds or holding companies, each is formed under the laws of the state of Delaware, and the business address for each is 2480 Sand Hill Road, Menlo Park, California 94025.

Rebtel Intressenter AB (“Rebtel Intressenter”), a private limited company organized under the laws of Sweden, holds approximately 11 percent of the equity of Rebtel Owners. Rebtel Intressenter is a special purpose vehicle associated with an employee incentive program and is owned by prior Rebtel employees, none of whom individually hold indirectly a ten percent

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or greater indirect interest in Rebtel. Rebtel Intressenter's address is Godtemplarvägen 30, 132 49 Saltsjö-Boo, Sweden.

Minority Invest AB ("Minority Invest") holds approximately 30 percent of the equity of Rebtel Partners. Minority Invest is a newly formed private limited company organized under the laws of Sweden. The principal business of Minority Invest is holding company, and its address is Vattugatan 6, 172 73 Sundbyberg, Sweden.

Certain management and key personnel of Rebtel collectively hold 100 percent of the equity of Minority Invest. Magnus Larsson, Rebtel's chief executive officer, holds an approximate 46.7 percent interest in Minority Invest (and thus an approximate indirect 14 percent interest in Rebtel). Mr. Larsson is a Swedish citizen, and his address is Vattugatan 6, 172 73 Sundbyberg, Sweden. No other employees individually hold sufficient interest in Minority Invest to give them a ten percent or more indirect ownership interest in Rebtel.

To the best of Rebtel's knowledge, no other individual or entity holds directly or indirectly 10 percent or more of the equity of Rebtel.

Please contact the undersigned if you have any questions regarding this supplement.

Respectfully submitted,

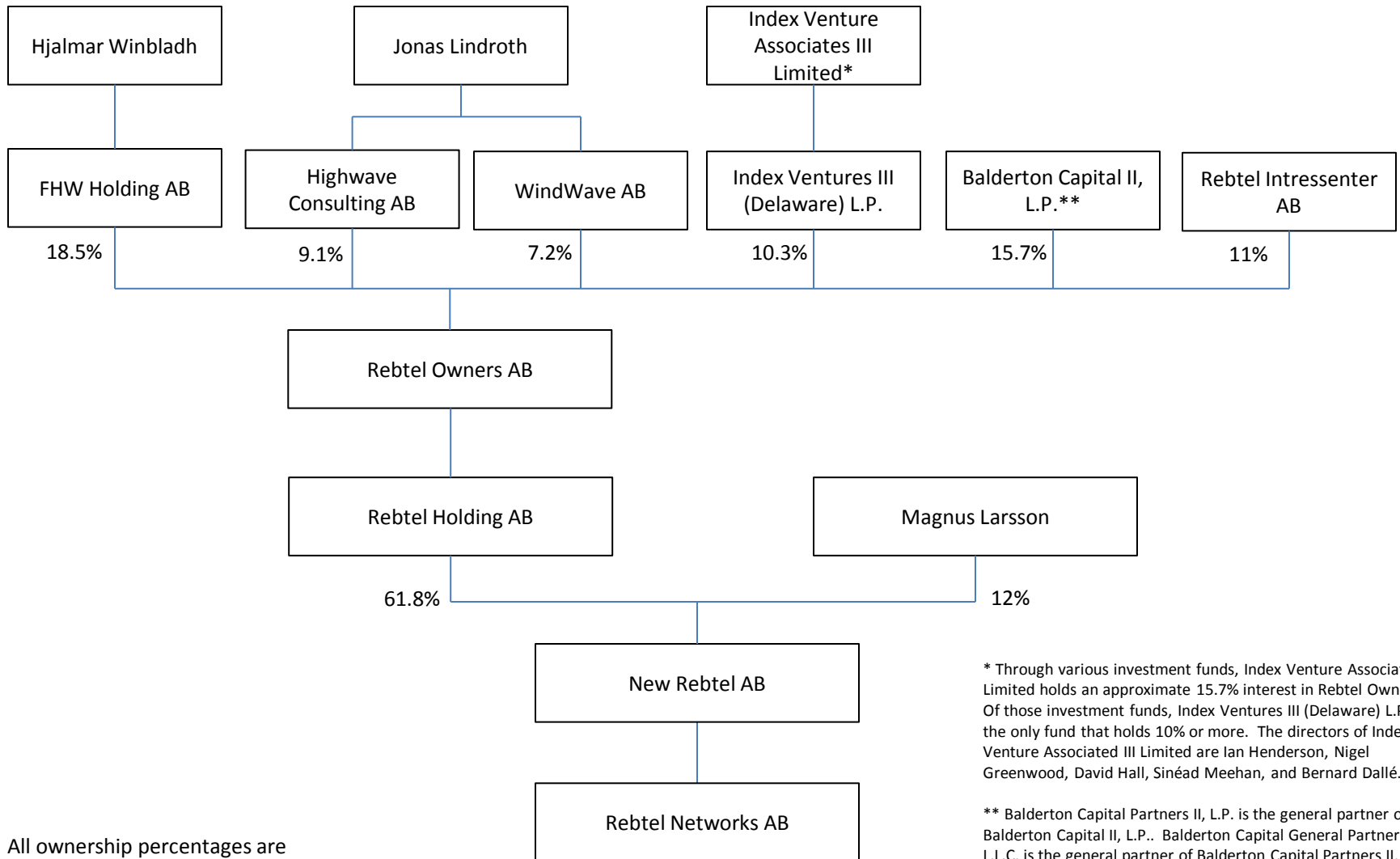
/s/ Jennifer L. Kostyu

Jennifer L. Kostyu
Counsel to Rebtel Networks AB

Attachment

cc: David Krech
Sumita Mukhoty

Rebtel Networks AB – Pre-Reorganization

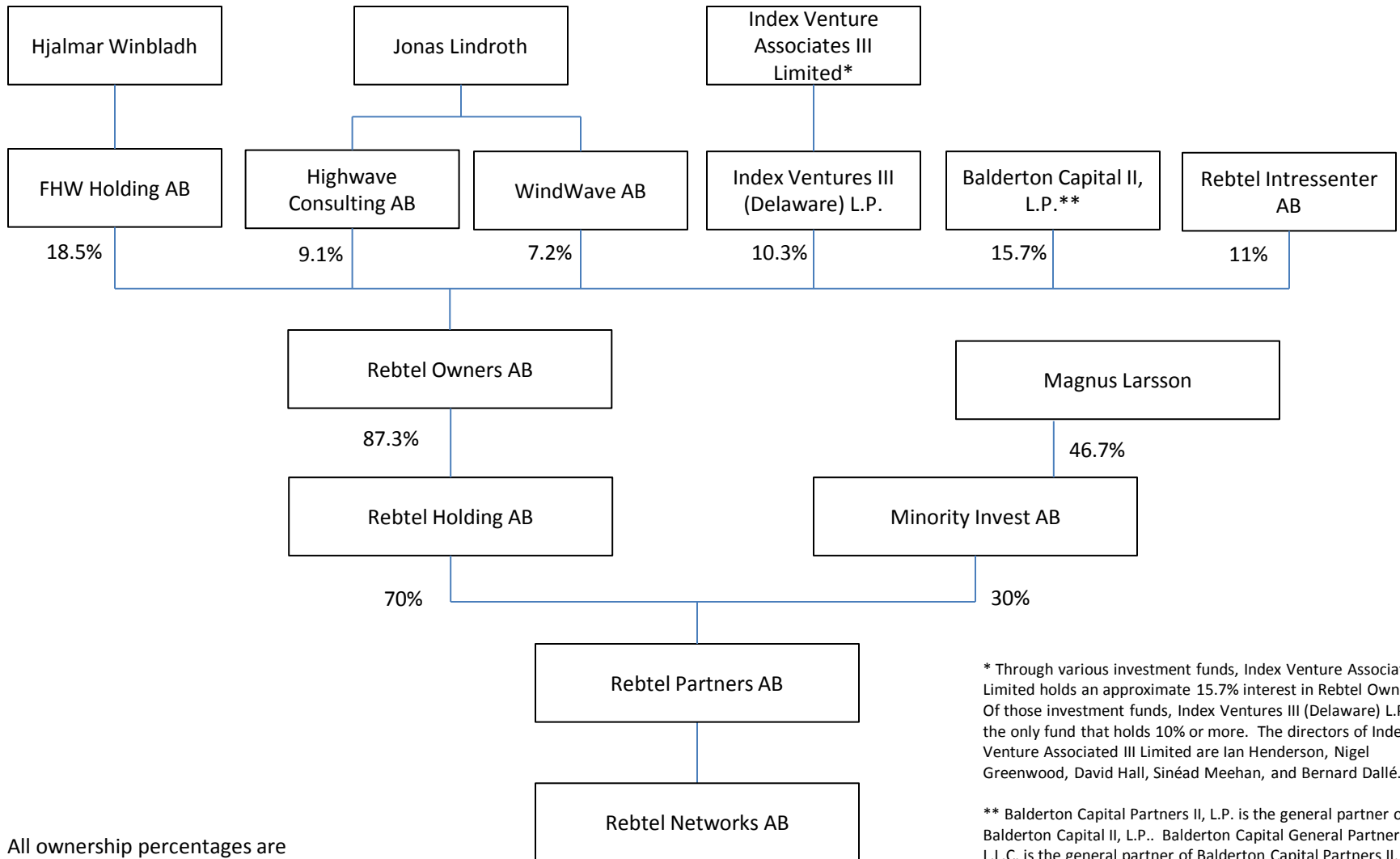


All ownership percentages are 100% unless otherwise indicated

* Through various investment funds, Index Venture Associates III Limited holds an approximate 15.7% interest in Rebtel Owners. Of those investment funds, Index Ventures III (Delaware) L.P. is the only fund that holds 10% or more. The directors of Index Venture Associated III Limited are Ian Henderson, Nigel Greenwood, David Hall, Sinéad Meehan, and Bernard Dallé.

** Balderton Capital Partners II, L.P. is the general partner of Balderton Capital II, L.P.. Balderton Capital General Partner II, L.L.C. is the general partner of Balderton Capital Partners II, L.P.

Rebtel Networks AB – Post-Reorganization



All ownership percentages are 100% unless otherwise indicated

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