ATTACHMENT 1 TO FCC SECTION 214 APPLICATION

Introduction: Link2YU Network LLC d/b/a MTEL USA ("MTEL USA," "Applicant" or the "Company"), a California limited liability company, requests authority, pursuant to Rule 63.18(e)(3), to provide international Section 214 services on a resale basis between the U.S. and (i) Serbia; (ii) Bosnia and Herzegovina; and (iii) Kosovo.[1] At this time, these destination countries are not members of the World Trade Organization ("WTO").[2] Applicant proposes to offer mobile voice, data, and broadband services nationwide through the resale of Commercial Mobile Radio Service (CMRS) capacity provided by unaffiliated U.S. carriers. MTEL USA will operate exclusively through resale and will not own or lease any physical telecommunications infrastructure. In connection with this request, MTEL USA certifies that it will comply with the terms and conditions contained in Rules 63.21 and 63.23.

Notice regarding compliance with foreign ownership review:
In response to Rule 63.18(p), Applicant has submitted responses to Standard Questions directly to the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (Committee). A complete and unredacted copy of this application, including the file number, is being submitted to the Committee within three business days of this filing.

In support of its request for resale international Section 214 authority, MTEL USA provides the following responses :

<u>Response to Application Item 11/11a (Ownership)</u>
Details for the entities (or individuals) that directly or indirectly hold at least 10% of the equity and/or voting interests, or a controlling interest, of the Applicant:

Interest Holder Name	**MTEL Global d.o.o. Beograd ("MTEL Global")**
Address	Vladmira Popovica 6, Unit B23, Beograd, 11070 Serbia
Citizenship or Country of Incorporation	Serbia
Dual or more if applicable	Not applicable
Principal Business	Telecommunications and support services, including ownership of MVNO entities
Name of entity in which interest holder has a direct 10% or more equity or voting interest	Link2YU Network LLC d/b/a MTEL USA
Direct equity interest held	100%
Direct voting interest held	100%
Resulting interests held in Applicant	100% direct equity and voting interest

[1] Kosovo does not appear in the application form drop-down menus and is identified in that form as "other nonspecified areas."

[2] MTEL USA has a separate pending application, pursuant to Rule 63.18(e)(2), for international Section 214 reseller authority between the U.S. and all destination countries except Serbia, Bosnia and Herzegovina, and Kosovo.

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Interest Holder Name	**Telekomunikacije Republike Srpske A.D. Banja Luka (“MTEL Banja Luka”)**
Address	Street Vuka Karadzica 2, Banja Luka, Bosnia and Herzegovina
Citizenship or Country of Incorporation	Bosnia and Herzegovina
Dual or more if applicable	Not applicable
Principal Business	Telecommunications services
Name of entity in which interest holder has a direct 10% or more equity or voting interest	MTEL Global
Direct equity interest held	41%
Direct voting interest held	41%
Resulting interests held in Applicant	41% indirect equity and voting interest
Interest Holder Name	**Telekom Srbija AD**
Address	Takovska 2, 11000 Belgrade, Serbia
Citizenship or Country of Incorporation	Serbia
Dual or more if applicable	Not applicable
Principal Business	Telecommunications services, parent company of the Telekom Srbija Group
Name of entity in which interest holder has a direct 10% or more equity or voting interest	MTEL Global and MTEL Banja Luka
Direct equity interest held	59% in MTEL Global and 65% in MTEL Banja Luka
Direct voting interest held	59% in MTEL Global and 65% in MTEL Banja Luka
Resulting interests held in Applicant	85.7% indirect equity interest; 100% indirect voting interest
Interest Holder Name	**Government of the Republic of Serbia**
Address	Nemanjina st. no. 11, 11000 Belgrade, Serbia
Citizenship or Country of Incorporation	Serbia
Dual or more if applicable	Not applicable
Principal Business	Government
Name of entity in which interest holder has a direct 10% or more equity or voting interest	Telekom Srbija AD
Direct equity interest held	58.11%
Direct voting interest held	58.11%
Resulting interests held in Applicant	49.8% indirect equity and 100% indirect voting interest

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Note: 20% of the shares in Telkom Srbija are held as "Treasury Shares," *i.e.*, shares that were initially authorized and which, following issuance to an external shareholder, the Company then re-acquired. These shares have not been cancelled and may be resold to a third party at any time. Under Serbian law, identification of Telkom Srbija's ownership continues to include these Treasury Shares, with the result that the interests of other shareholders are not adjusted based upon the Company's buy-back and holding of these shares.

We respectfully note that the ownership structure described in our submission is based on information publicly available through the Central Securities Depository and Clearing House of the Republic of Serbia, which is legally mandated to maintain and publish records of the shareholding structure of Serbian joint-stock companies.

Under the Serbian Companies Act, treasury shares do not confer voting rights and are accordingly excluded when determining quorum and the majority required for resolutions at a shareholders' meeting. As a practical matter, this means that, although the holding of treasury shares by the company does not alter the formal ownership percentages of the remaining shareholders in the company's share capital, it may increase their relative voting power in the context of shareholder decision-making, as the total number of votes capable of being cast is reduced. Further, for purposes of calculating ownership and voting-right thresholds under the Serbian Capital Markets Act and the Takeover Act, the relevant percentages are determined by reference to the total number of issued voting shares, including treasury shares held by the issuer. Accordingly, the acquisition of treasury shares by the company does not, in itself, result in an increase in the percentage holding of the remaining shareholders for purposes of those rules.

> By way of illustration, if a shareholder holds 24% of the shares and the company acquires 5% of its own shares, that shareholder would still be deemed to hold 24% for the purposes of those statutes, as the calculation remains based on the total number of issued shares, including treasury shares.

<u>Response to Application Item 13 (Foreign Carrier Affiliation)</u>

A chart of Applicant's foreign carrier affiliates is provided below for reference.

Foreign Carrier	Country of Affiliation	Ownership interests that trigger affiliation	Does applicant request authority to serve this country	WTO member (Y/N)	Brief description of communications services
Telekom Srbija AD	Serbia	>25% in Applicant	Yes	No. Serbia is in the accession process	Mobile Telephony (MTS): 2G/3G/4G/5G services. Fixed Telephony: Traditional fixed lines Fixed/Mobile Internet: DSL, Fiber (FTTx), and mobile broadband.

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Foreign Carrier	Country of Affiliation	Ownership interests that trigger affiliation	Does applicant request authority to serve this country	WTO member (Y/N)	Brief description of communications services
Telekomunikacije Republike Srpske A.D. Banja Luka	Bosnia and Herzegovina	>25% in Applicant	Yes	No. Bosnia and Herzegovina is in the accession process	Mobile Telephony: Voice and data services. Fixed Telephony: Traditional and VoIP fixed lines. Fixed/Mobile Internet: Fiber, xDSL, and mobile broadband.
Blicnet d.o.o. Banja Luka	Bosnia and Herzegovina	>25% common ownership	Yes	No. Bosnia and Herzegovina is in the accession process	Mobile Telephony: Voice and data services. Fixed Telephony: Traditional and VoIP fixed lines.
LOGOSOFT d.o.o. Sarajevo	Bosnia and Herzegovina	>25% common ownership	Yes	No. Bosnia and Herzegovina is in the accession process	Mobile Telephony: Voice and data services. Fixed Telephony: Traditional and VoIP fixed lines.
Mtel d.o.o. Podgorica	Montenegro	>25% common ownership	Yes	Yes	Mobile Telephony: Voice and data services. Fixed Telephony: Fixed lines (VoIP). Fixed/Mobile Internet: Fiber and mobile broadband.
MTEL Austria GmbH	Austria	>25% common ownership	Yes	Yes	Mobile Telephony: Voice, SMS, and data plans.
MTEL Deutschland GmbH	Germany	>25% common ownership	Yes	Yes	Mobile Telephony: Voice, SMS, and data plans.
MTEL Schweiz GmbH	Switzerland	>25% common ownership	Yes	Yes	Mobile Telephony: Voice, SMS, and data plans.
MTS d.o.o.	Kosovska Mitrovica (Kosovo*)	>25% common ownership	Yes	No	Mobile Telephony: Voice, SMS, and data plans.
MTEL DOOEL Skopje	North Macedonia	>25% common ownership	Yes	Yes	Mobile Telephony: Voice, SMS, and data plans.

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Following are the information and certifications required by Section 63.18(i) through(m):

63.18(i) Applicant certifies as follows:

1) It is not a foreign carrier;
2) It is affiliated with several foreign carriers;
3) The foreign countries in which Applicant is affiliated with a foreign carrier are Montenegro, Austria, Germany, Switzerland, North Macedonia, Serbia, Bosnia and Herzegovina, and Kosovo.

63.18(j) Applicant certifies as follows:

1) It is not a foreign carrier in any country.
2) It does not control a foreign carrier in any country.
3) In this application, the Company seeks to provide international telecommunications services to destination countries (specifically Serbia, Bosnia and Herzegovina, and Kosovo) in which entities that own more than 25 percent of the applicant, or that control the applicant, control a foreign carrier in that country.
4) The Company does not seek to provide international telecommunications services to destination countries in which two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of the applicant and are parties to, or the beneficiaries of, a contractual relation (e.g., a joint venture or market alliance) affecting the provision or marketing of international basic telecommunications services in the United States.

63.18(k): The countries that Applicant has identified in response to Rule 63.18(j), above, currently are not members of the WTO, though Serbia and Bosnia and Herzegovina are each progressing through the accession process preparatory to becoming WTO members. Importantly, as explained in the discussion for 63.18(m), **the Applicant is not requesting non-dominant classification based on the lack of market power of its affiliates, but instead pursuant to Rule 63.10(a)(4)**. Nonetheless, Applicant addresses below the market position of its foreign carrier affiliates in these three non-WTO countries.

TELEKOM SRBIJA (Serbia)

The Regulatory Authority for Electronic Communications and Postal Services in Serbia (“RATEL”), in the course of the ex-ante regulation of electronic communications markets, designated Telekom Srbija a.d., Belgrade (“Telekom Srbija”) as an operator with Significant Market Power (“SMP operator”) on the following wholesale markets:

1. The market for call termination at a fixed location on the public telephone network and in the mobile network;
2. The market for local access to network elements provided at a fixed location;

3. The market for central access provided at a fixed location for mass-market products.

According to RATEL's Q3 2025 report, Telekom Srbija holds a 41.62% share of the Serbian mobile telephony market (measured by the number of active subscribers).

MTEL Banja Luka (Bosnia and Herzegovina)

LOGOSOFT d.o.o. Sarajevo ("Logosoft") (Bosnia and Herzegovina)

Blicnet d.o.o. Banja Luka ("Blicnet") (Bosnia and Herzegovina)

In 2012, the Communications Regulatory Agency of Bosnia and Herzegovina ("RAK") published a list of operators with Significant Market Power. MTEL Banja Luka was designated as one of these for the following markets:

1. the market for fixed telephony and mobile telephony services;
2. the market for leased lines.

A 2020 market analysis from RAK designated MTEL Banja Luka as an operator with Significant Market Power in the markets for call termination on individual public telephone networks at a fixed location and on individual mobile networks – wholesale level. According to the latest available quarterly report of RAK for Q2 2025, as of 30 June 2025, the MTEL Group (in this market, MTEL Banja Luka as an MNO and affiliates Logosoft and Blicnet as service providers) holds a 33.84% share of the mobile telephony market. Logosoft and Blicnet primarily provide fixed broadband and related electronic communications services. They each hold a negligible share of the mobile services market (respectively, approximately 0.04% and 0.01%) and are deemed not to hold significant market power in the fixed telephony or wholesale voice markets.

As a general matter, while acknowledging the significant market presence of its affiliates, Applicant notes that the markets in these three countries each have a number of providers, operating subject to regulated nondiscriminatory frameworks for termination and other wholesale services. This ensures that U.S. carriers have a choice among such providers (with which to negotiate arrangements, on commercially reasonable terms) when making routing and interconnection decisions.

MTS d.o.o. (Kosovo)

MTS d.o.o's primary registered activity is wireline telecommunications, with wireless telecommunications as a secondary activity. One of five main companies that account for approximately 80 percent of Kosovo's internet service, MTS d.o.o. does not hold significant market power in the fixed telephony or wholesale voice markets. Based on publicly available data from the regulator (AKEP/ARKEP), as of Q3/2025, MTS d.o.o. served approximately one percent or less of mobile subscribers.

63.18(l) [Reserved – not in use at this time]

63.18(m): MTEL USA qualifies for non-dominant classification on all routes for which authority is requested in this application, pursuant to 63.10(a)(4), which states that a carrier that "*provides such service solely through the resale of an unaffiliated U.S. facilities-based carrier's international* *switched services (either directly or indirectly through the resale of another U.S. resale carrier's international switched services), shall presumptively be classified as non-dominant for the provision of the authorized service*." The Company requests international Section 214 authority solely on a resale basis and does not propose to resell the international switched services of an affiliated U.S. facilities-based carrier. (Indeed, the Company does not have any affiliations with U.S. facilities-based carriers.)

As explained in this application, MTEL USA is affiliated with several foreign carriers. (See response, above, to 13.) Among those are a few affiliates with a significant market presence in their respective countries; however, as contemplated by 63.10(a)(4) and recognized by the Commission, the Company's plan to operate solely as a reseller of unaffiliated providers' services alleviates the traditional concerns associated with such affiliations.[3] MTEL USA understands that, should it decide, in future, to resell the services of affiliated carriers or to operate on a facilities basis, the Company will be required to notify the Commission so that its classification as non-dominant can be reviewed.

Response to Application Item 13b

See preceding response (specifically regarding 63.18(m).

Response to Application Item 13c (Requested Non-Dominant Classification)

As explained in the preceding response to 63.18(m), the Applicant requests non-dominant classification on all destination routes where it has foreign carrier affiliates, *i.e.*, on the routes between the U.S. and Serbia, Bosnia and Herzegovina, and Kosovo.

Response to Application Item 16 (Requests Pursuant to Rule 63.18(e)(3)

As explained above, MTEL USA requests authority, pursuant to Rule 63.18(e)(3), to operate as a reseller of international Section 214 services between the U.S. and (i) Serbia, (ii) Bosnia and Herzegovina, and (iii) Kosovo. The Company is affiliated with foreign carriers operating in these three non-WTO countries and, pursuant to 63.23(a)(1), must be granted authority under Rule 63.18(e)(3) to provide services on these routes. MTEL USA proposes to offer mobile voice, data, and broadband services on these routes through the resale of CMRS capacity provided by unaffiliated U.S. carriers. The Company will operate exclusively through resale of unaffiliated U.S. carriers and will not own or lease any physical telecommunications infrastructure.

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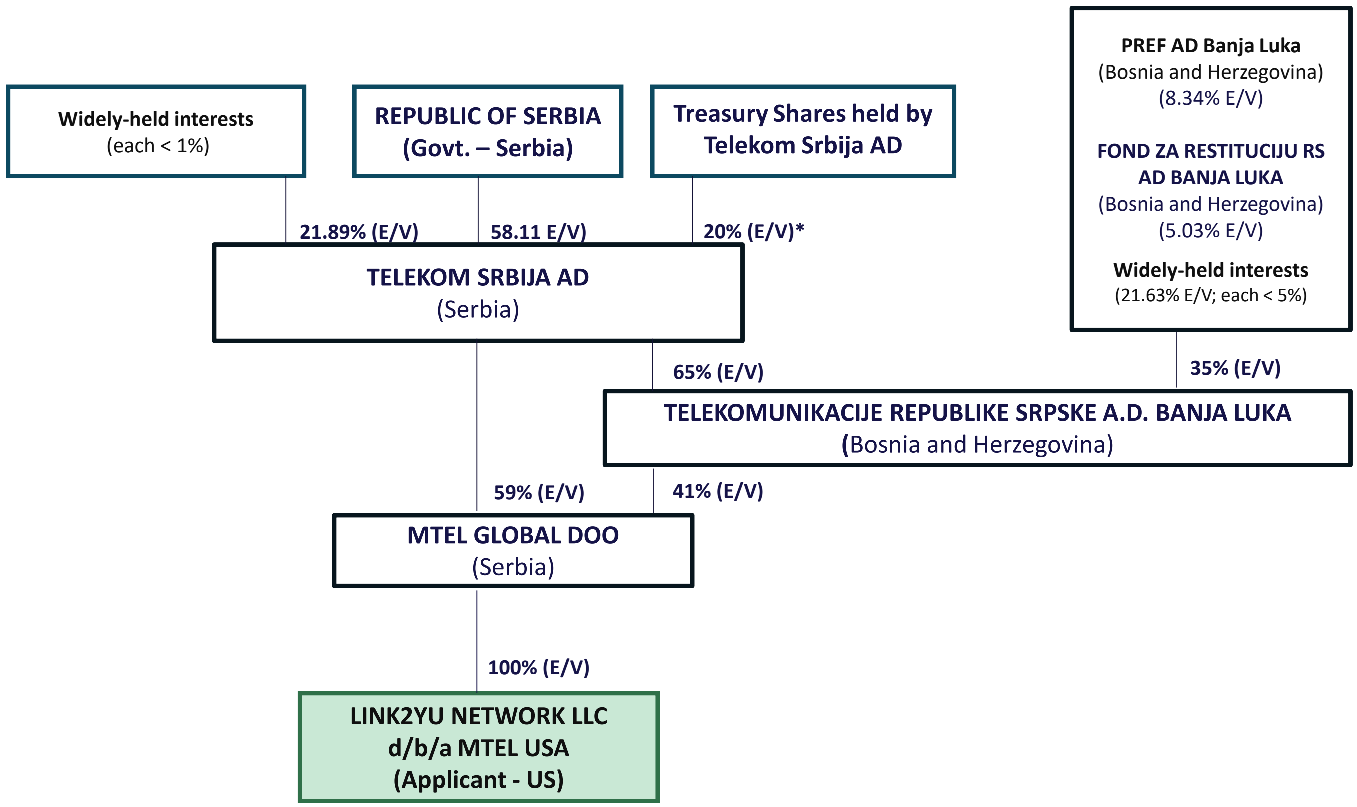
[3] *See, e.g.*, *Review of International Section 214 Authorizations to Assess Evolving National Security, Law Enforcement, Foreign Policy, and Trade Policy Risks*, FCC 23-28, Order and Notice of Proposed Rulemaking at n. 69: "Under the Commission's rules, a carrier is classified as non-dominant on a U.S.-international route if it is not affiliated with a foreign carrier with market power on the foreign end of the route or it provides an international switched service on that route solely through the resale of an unaffiliated U.S. facilities-based carrier's international switched services". . . "Except as provided in paragraph (a)(4) of this section, a U.S. carrier that is, or that has or acquires an affiliation with a foreign carrier that is a monopoly provider of communications services in a relevant market in a destination country shall presumptively be classified as dominant for the provision of international communications services on that route . . . .". (emphasis added; citations omitted).

Ownership Interests Chart for
LINK2YU NETWORK LLC d/b/a MTEL USA
(E: Equity Interest; V: Voting Interest)

(June 2026)



*** Note:** 20% of the shares in Telekom Srbija AD are held as "Treasury Shares," *i.e.*, shares that were initially authorized and which, following issuance to an external shareholder, the Company then re-acquired. These shares have not been cancelled and may be resold to a third party at any time. Under Serbian law, identification of Telkom Srbija's ownership continues to include these Treasury Shares, with the result that the interests of other shareholders are not adjusted based upon the Company's buy-back and holding of these shares.