

FCC INTERNATIONAL SECTION 214 – GLOBAL RESALE AUTHORITY

Applicant: 9 Earth Inc. (California, USA)

Application type: ITC-214 Amendment Filing

FRN: 0037639747

Date: May 27, 2026

9 Earth Inc. (“Applicant”) hereby submits this amendment in response to the Federal Communications Commission’s request for additional information regarding the above-referenced International Section 214 application.

This amendment updates and supplements the ownership and control disclosures previously submitted with the application. Specifically, the Applicant has:

1. Updated Question 11.a of the ITC-214 application to include all reportable direct and indirect 10% or greater interest holders;
2. Provided additional information regarding the Applicant’s indirect ownership structure, including ownership percentages, citizenship, addresses, and principal business activities;
3. Submitted a revised ownership and control disclosure attachment; and
4. Submitted a revised ownership diagram illustrating the Applicant’s vertical ownership structure and the direct and indirect equity and voting interests held by reportable interest holders.

The Applicant respectfully submits that the amended filing fully responds to the Commission’s request.

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Via ICFS
Federal Communications Commission
Office of International Affairs
Washington, D.C.

Re: Amendment to Application of 9 Earth Inc. for International Section 214 Global
Resale Authority
FCC File No.: ITC-214-20251121-00145

Dear Sir or Madam:

9 Earth Inc. ("Applicant") respectfully submits this consolidated attachment package in support of its amended application for International Section 214 global resale authority and in response to the Commission's request for additional information.

The Applicant seeks authority to provide international telecommunications services on a resale basis through the use of transmission services obtained from authorized underlying U.S. and foreign carriers, pursuant to Section 63.18(e)(2) of the Commission's rules.

This submission is intended to address the Commission's requested ownership and control disclosure updates and to facilitate review under 47 C.F.R. § 63.18 and applicable Executive Branch review procedures.

Each attachment is labeled and organized to correspond directly to the relevant ICFS application questions and rule sections. The Applicant certifies that the information provided herein is true, complete, and accurate to the best of its knowledge.

Respectfully submitted,

Gang Wang
Chief Executive Officer
9 Earth Inc.

Attachment A — Description Of Services

(ICFS Questions 14–16 | 47 C.F.R. § 63.18(e)(2))

9 Earth Inc. is a U.S. corporation organized under the laws of the State of California. The Applicant seeks global resale authority to provide international telecommunications services solely through resale of transmission services obtained from authorized U.S. and foreign underlying carriers.

The Applicant will provide managed SD-WAN and related private connectivity services to business customers. The Applicant does not own or operate international transmission facilities and will not provide facilities-based services.

Attachment B — Ownership And Control Disclosure

(ICFS Questions 10–11 | 47 C.F.R. § 63.18(h))

Applicant

9 Earth Inc. is a corporation organized under the laws of the State of California, United States.

B.1 Direct Ownership

9 Earth Inc. is directly owned by Earth Network Technology (Hong Kong) Co., Limited, which holds 100% of the equity and voting interests in the Applicant.

B.2 Earth Network Technology (Hong Kong) Co., Limited

Earth Network Technology (Hong Kong) Co., Limited is organized under the laws of Hong Kong and maintains its principal place of business at:

Address:

Flat/Rm 06, 23/F, Block A
Hoover Industrial Building
26–38 Kwai Cheong Road
Kwai Chung, New Territories
Hong Kong

Earth Network Technology (Hong Kong) Co., Limited provides network technology and telecommunications services, including IP transit, SD-WAN, peering, and related connectivity services.

B.3 Reportable Indirect Interest Holders

Gang Wang

Gang Wang is a citizen of China and holds a 65% indirect equity and voting interest in 9 Earth Inc. through Earth Network Technology (Hong Kong) Co., Limited.

Principal Business:

Executive management and telecommunications/network technology services.

Address:

16 Imperial Aisle
Irvine, CA 92606, United States

Wangen Huang

Wangen Huang is a citizen of China and holds a 30% indirect equity and voting interest in 9 Earth Inc. through Earth Network Technology (Hong Kong) Co., Limited.

Principal Business:

Telecommunications and network technology services.

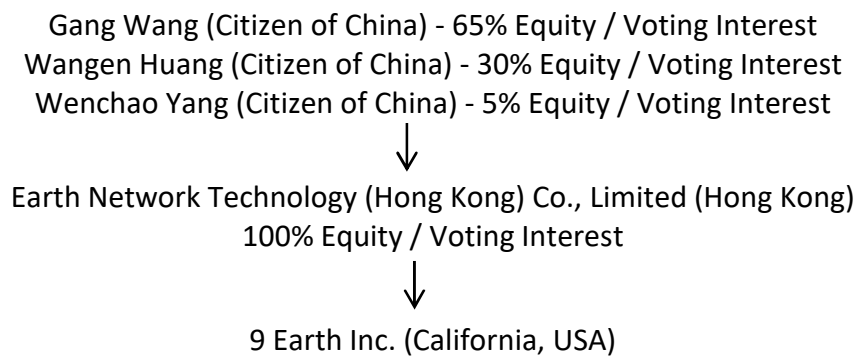
Address:

Flat/Rm 06, 23/F, Block A
Hoover Industrial Building
26–38 Kwai Cheong Road
Kwai Chung, New Territories
Hong Kong

Non-Reportable Interest Holder

Wenchao Yang, a citizen of China, holds a 5% indirect equity and voting interest in 9 Earth Inc. through Earth Network Technology (Hong Kong) Co., Limited. Because the ownership interest is below 10%, Wenchao Yang is not a reportable interest holder under 47 CFR § 63.18(h)(1).

B.4 Ownership Diagram



B.5 Foreign Carrier Certification

The Applicant does not own or operate international transmission facilities. The Applicant will provide international telecommunications services on a resale basis using the facilities and services of authorized underlying carriers.

B. 6 Supporting Documents

編號 2444156
No.


公 司 註 冊 處
COMPANIES REGISTRY

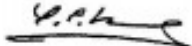
公 司 註 冊 證 明 書
CERTIFICATE OF INCORPORATION

本人謹此證明
I hereby certify that

Earth Network Technology (HongKong) Co., Limited
爾司網絡科技(香港)有限公司

於 本 日 根 據 香 港 法 例 第 622 章 《 公 司 條 例 》
is this day incorporated in Hong Kong under the Companies Ordinance
在 香 港 成 立 為 法 團 ， 此 公 司 是 一 間
(Chapter 622 of the Laws of Hong Kong), and that this company is
有 限 公 司 。
a limited company.

本 證 明 書 於 二 〇 一 六 年 十 月 三 十 一 日 發 出 。
Issued on 31 October 2016.



香港特別行政區公司註冊處處長鍾麗玲
Ms Ada L L CHUNG
Registrar of Companies
Hong Kong Special Administrative Region

註 Note :
公司名稱獲公司註冊處註冊，並不表示獲授予該公司名稱或其任何部分的商標權或任何其他知識產權。
Registration of a company name with the Companies Registry does not confer any trade mark rights or any other intellectual property rights in respect of the company name or any part thereof.



扫描全能王 创建

繳款後，請沿虛線剪下並將有效的商業/分行登記證展示在營業地點。

Please cut along the dotted line after making payment and display the valid business/branch registration certificate at business address.

正 本 ORIGINAL		表格 2 FORM 2 《商業登記條例》(第 310 章) BUSINESS REGISTRATION ORDINANCE (Chapter 310) 《商業登記規例》 BUSINESS REGISTRATION REGULATIONS		[第 5 條] [regulation 5]
XXXXXX XXXXXX		商業 XXXX 登記證 Business XXXX Registration Certificate		
				
業務 / 法團所用名稱 Name of Business/ Corporation		爾司網絡科技(香港)有限公司 EARTH NETWORK TECHNOLOGY (HONGKONG) CO., LIMITED		
業務 / 分行名稱 Business/ Branch Name		***** *****		
地 址 Address		FLAT/RM 06 BLK A 23/F HOOVER IND BLDG 26-38 KWAI CHEONG RD KWAI CHUNG NT		
業務性質 Nature of Business		CORP		
法律地位 Status		BODY CORPORATE		
生效日期 Date of Commencement	屆滿日期 Date of Expiry	登記證號碼 Certificate No.	登記費及徵費 Fee and Levy	
31/10/2025	30/10/2026	66837019-000-10-25-8	\$2,200 (登記費 FEE = \$2,200) (徵費 LEVY = \$ 0)	
請注意下列《商業登記條例》的規定：		Please note the following requirements of the Business Registration Ordinance:		
1. 第 6(6)條規定任何業務獲發商業登記證或分行登記證，並不表示該業務或經營該業務的人或受僱於該業務的僱員已遵從有關的任何法律規定。		1. Section 6(6) provides that the issue of a business registration certificate or a branch registration certificate shall not be deemed to imply that the requirements of any law in relation to such business or to the persons carrying on the same or employed therein have been complied with.		
2. 第 12 條規定各業務須將其有效的商業登記證或有效的分行登記證於每一營業地點展示。		2. Section 12 provides that valid business registration certificate or valid branch registration certificate shall be displayed at every address where business is carried on.		
繳款時請將此商業 XXXX 登記證及繳款通知書完整交出。在付款後，本繳款通知書方成為有效的商業/XXXX 登記證。(請參閱背頁繳款辦法所載內容。)				
Please produce this certificate and demand note intact at time of payment. This demand note will only become a valid business/XXXX registration certificate upon payment. (Please see payment instructions overleaf.)				
機印所示登記費及徵費收訖。 RECEIVED FEE AND LEVY HERE STATED IN PRINTED FIGURES.				
H20201 03/11/25 56838155 581000 CHD		\$2,200.00 M		

THE COMPANIES ORDINANCE (CHAPTER 622)

**Private Company Limited by Shares
ARTICLES OF ASSOCIATION
OF**

Earth Network Technology (HongKong) Co., Limited

爾司網絡科技(香港)有限公司

Part A Mandatory Articles

1. Company Name

The name of the company is

Earth Network Technology (HongKong) Co., Limited

爾司網絡科技(香港)有限公司

2. Members' Liabilities

The liability of the members is limited.

3. Liabilities or Contributions of Members

The liability of the members is limited to any amount unpaid on the shares held by the members.

4. Share Capital and Initial Shareholdings (on the company's formation)

The total number of shares that the company proposes to issue

10,000,000

The total amount of share capital to be subscribed by the company's founder members

HKD10,000,000

(i) The amount to be paid up or to be regarded as paid up

HKD10,000,000

(ii) The amount to remain unpaid or to be regarded as remaining unpaid

HKD0



Class of Shares

The total number of shares in this class that the company proposes to issue

The total amount of share capital in this class to be subscribed by the company's founder members

- (i) The amount to be paid up or to be regarded as paid up
- (ii) The amount to remain unpaid or to be regarded as remaining unpaid

Ordinary
10,000,000
HKD10,000,000
HKD10,000,000
HKD0

I/WE, the undersigned, wish to form a company and wish to adopt the articles of association as attached, and I/we respectively agree to subscribe for the amount of share capital of the Company and to take the number of shares in the Company set opposite my/our respective name(s).

Name(s) of Founder Members	Number of Share(s) and Total Amount of Share Capital
WANG GANG 王刚	6,500,000 Ordinary shares HKD6,500,000
HUANG WANGEN 黄万根	3,000,000 Ordinary shares HKD3,000,000
YANG WENCHAO 杨文超	500,000 Ordinary shares HKD500,000
Total:	10,000,000 Ordinary shares HKD10,000,000



Attachment C — Interlocking Directorates

(ICFS Question 12 | 47 C.F.R. § 63.18(h))

The Applicant is not aware of any interlocking directorates with a foreign carrier that would require disclosure under 47 C.F.R. § 63.18(h).

To the best of the Applicant's knowledge, no officer or director of 9 Earth Inc. serves as an officer or director of a foreign carrier with market power on any international telecommunications route to the United States.

Attachment D — Non-Dominant And Foreign Carrier Status

(ICFS Questions 17–18 | 47 C.F.R. §§ 63.09, 63.10)

The Applicant does not own or operate international transmission facilities and seeks authority solely to provide international telecommunications services on a resale basis using the facilities and services of authorized underlying carriers.

The Applicant does not possess market power on any international telecommunications route and qualifies as a non-dominant carrier for purposes of international resale services pursuant to 47 C.F.R. § 63.10.

Attachment E — Statutory And Regulatory Certifications

(ICFS Questions 19–21 | 47 C.F.R. § 63.18(i)–(m))

The Applicant certifies that:

- It will comply with all applicable provisions of the Communications Act and the Commission's rules;
- It will comply with the Communications Assistance for Law Enforcement Act (CALEA);
- It will comply with the Commission's truthfulness and accuracy requirements under 47 C.F.R. §§ 1.17 and 1.65;
- It is not subject to any denial of federal benefits pursuant to 21 U.S.C. § 862.

Attachment F — Network Operations, Data Storage, And Security

(Executive Branch Committee Standard Questions)

F.1 Network Operations

The Applicant maintains network operations, customer support, and administrative functions in the United States. Certain affiliated personnel located outside the United States may provide limited operational or technical support functions under company supervision and access control policies.

F.2 Data Storage

Customer configuration data, network logs, and service management records are stored and maintained in the United States. The Applicant does not store U.S. customer communications records outside the United States.

F.3 Remote Access Controls

Administrative access to customer production networks is restricted to authorized personnel subject to company access control policies and monitoring procedures.

F.4 Cybersecurity and Supply Chain

The Applicant implements cybersecurity safeguards consistent with industry best practices and procures services only from authorized underlying carriers and reputable vendors.

Attachment G — Executive Branch Acknowledgment And Certification

The Applicant acknowledges that it will submit responses to the Executive Branch Committee's Standard Questions pursuant to Part 1, Subpart CC, concurrently with its FCC International Section 214 application, and will cooperate fully with any review conducted by the Committee.

I certify under penalty of perjury that the foregoing information is true and correct to the best of my knowledge.

Gang Wang
Chief Executive Officer
9 Earth Inc.

Date: May 27, 2026

