

## Revised Supplement to International Section 214 Application

Applicant: NeuroX Global Technologies LP

FCC File No.: 0037106788

Subject: Supplement to International Section 214 Application Pursuant to 47 C.F.R. § 63.18(i)–(m)

July 27, 2026

Federal Communications Commission Office  
of International Affairs

### Supplement

NeuroX Global Technologies LP ("NeuroX" or "Applicant") respectfully submits this supplement to its pending International Section 214 application in response to the Commission's request for the information and certifications required under 47 C.F.R. § 63.18(i) through (m).

#### Certification Pursuant to 47 C.F.R. § 63.18(i)

The Applicant certifies that NeuroX Global Technologies LP is not a foreign carrier and is affiliated with a foreign carrier Ghana called NeuroX Ghana Limited.

#### Certification Pursuant to 47 C.F.R. § 63.18(j)

The Applicant certifies that it does not seek authority to provide international telecommunications services to any destination country in which:

1. NeuroX is affiliated with a foreign carrier;
2. NeuroX has nondominant interest in a foreign carrier; or
3. NeuroX owning less than twenty-five percent (25%) of NeuroX, Ghana Limited and has non dominant controls over NeuroX Ghana Limited.

Accordingly, there is an affiliated foreign carrier whereas NeuroX Global Technologies has non-dominant control in conjunction with or destination countries requiring disclosure under Section 63.18(j).

#### Certification Pursuant to 47 C.F.R. § 63.18(k)

The Applicant certifies that none of the following applies:

- NeuroX is not a foreign carrier however it is affiliated with NeuroX Ghana Limited in a nondominant capacity.
- NeuroX does not control any foreign carrier.
- An entity that owns less than twenty-five percent (25%) of NeuroX, or otherwise nondominant controls NeuroX, Ghana Limited.

Therefore, no reportable foreign carrier relationships exist under Section 63.18(k).

Certification Pursuant to 47 C.F.R. § 63.18(l)

Section 63.18(l) is reserved and is therefore not applicable.

Regulatory Classification Pursuant to 47 C.F.R. § 63.18(m)

Because NeuroX is not a foreign carrier and is affiliated with a foreign carrier NeuroX Ghana Limited, Section 63.18(m) concerning requests for non-dominant regulatory classification is applicable.

Nevertheless, NeuroX requests that the Commission regulate it as an affiliate of NeuroX Ghana Limited with less than 25% stake and is a non-dominant international telecommunications carrier consistent with the Commission's rules governing applicants that have no foreign carrier affiliations.

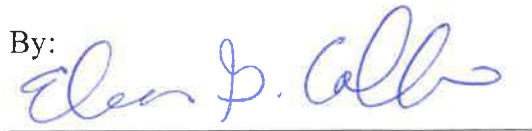
Conclusion

NeuroX Global Technologies LP respectfully submits that the foregoing certifications satisfy the requirements of 47 C.F.R. § 63.18(i) through (m) and requests that this supplement be incorporated into its pending International Section 214 application.

Respectfully submitted, NeuroX

Global Technologies LP

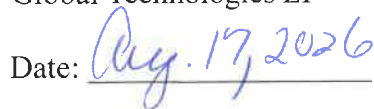
By:



Dr. Eleanor G. Collins, Ph.D.

Chief Executive Officer / General Partner NeuroX  
Global Technologies LP

Date:



## **SUPPLEMENTAL CLARIFICATION REGARDING NON-DOMINANT CLASSIFICATION**

**Applicant:** NeuroX Global Technologies LP

**FCC File No.:** ITC-214-20260108-00008

**Foreign Carrier:** NeuroX Ghana Limited (Ghana)

### **47 C.F.R. § 63.10(a)(2)**

“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.”

**Applicant's response:** NeuroX Global Technologies LP does not meet the criterion for presumptive dominant classification under § 63.10(a)(2). NeuroX Ghana Limited is not represented by the Applicant as a monopoly provider of communications services in Ghana. The Applicant therefore requests that § 63.10(a)(2) not be used as a basis to classify NeuroX Global Technologies LP as dominant on the U.S.-Ghana route.

### **47 C.F.R. § 63.10(a)(3)**

“A U.S. carrier that is, or that has or acquires an affiliation with a foreign carrier that is not a monopoly provider of communications services in a relevant market in a destination country and that seeks to be regulated as non-dominant on that route bears the burden of submitting information to the Commission sufficient to demonstrate that its foreign affiliate lacks sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market. If the U.S. carrier demonstrates that the foreign affiliate lacks 50 percent market share in the international transport and the local access markets on the foreign end of the route, the U.S. carrier shall presumptively be classified as non-dominant.”

**Applicant's response and market-power showing:** Section 63.09(f) defines “market power” as sufficient market power to affect competition adversely in the U.S. market. NeuroX Global Technologies LP states that NeuroX Ghana Limited does not possess such market power. The Applicant further states that NeuroX Ghana Limited does not hold a 50 percent or greater share of either the international transport market or the local access market in Ghana. Publicly available National Communications Authority (Ghana) industry statistics identify other established operators as the principal providers in Ghana's mobile and fixed markets and do not identify NeuroX Ghana Limited as holding a 50 percent or greater share of those markets. The Applicant therefore submits that NeuroX Ghana Limited lacks sufficient market power on the foreign end of the U.S.-Ghana route to affect competition adversely in the United States and that NeuroX Global Technologies LP qualifies for presumptive non-dominant classification under § 63.10(a)(3).

#### **47 C.F.R. § 63.10(a)(4)**

“A carrier that is authorized under this part to provide to a particular destination an international switched service, and 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 subsection further provides that a carrier regulated as non-dominant on this basis must notify the Commission if it begins providing such service through resale of an affiliated U.S. facilities-based carrier's international switched services; absent a Commission finding that another basis for non-dominant treatment applies, the carrier would then be deemed dominant on that route.

**Applicant's response:** To the extent NeuroX Global Technologies LP provides international switched service solely through resale of the international switched services of an unaffiliated U.S. facilities-based carrier, the Applicant meets the criterion in § 63.10(a)(4) and is presumptively non-dominant for that authorized service. The Applicant will notify the Commission if the facts relevant to this subsection materially change.

#### **Clarification of Certification Under 47 C.F.R. § 63.18(k)**

The Applicant clarifies its prior certification concerning the market power of the foreign carrier. NeuroX Ghana Limited **does not possess sufficient market power on the foreign end of the U.S.-Ghana route to affect competition adversely in the U.S. market**, as “market power” is defined in 47 C.F.R. § 63.09(f). The Applicant further states that NeuroX Ghana Limited is not a monopoly provider in a relevant market in Ghana and does not hold a 50 percent or greater market share in the relevant international transport or local access markets. Accordingly, the Applicant's response under § 63.18(k) is that the foreign carrier **does not have market power** for purposes of the Commission's international carrier rules.

#### **Conclusion**

For the foregoing reasons, NeuroX Global Technologies LP respectfully submits that the criteria in 47 C.F.R. § 63.10(a)(2) through (4) support non-dominant treatment where applicable, and specifically that the market-power showing under § 63.10(a)(3) supports classification of the Applicant as a non-dominant U.S. international carrier on the U.S.-Ghana route. The Applicant respectfully requests that this clarification be incorporated into its pending International Section 214 application.

**Certification:** The foregoing factual representations should be submitted only to the extent they are true and correct based on the Applicant's records and knowledge.

# ATTACHMENT A

## OWNERSHIP STRUCTURE AND FOREIGN ENTITY RELATIONSHIP

### NeuroX Global Technologies LP

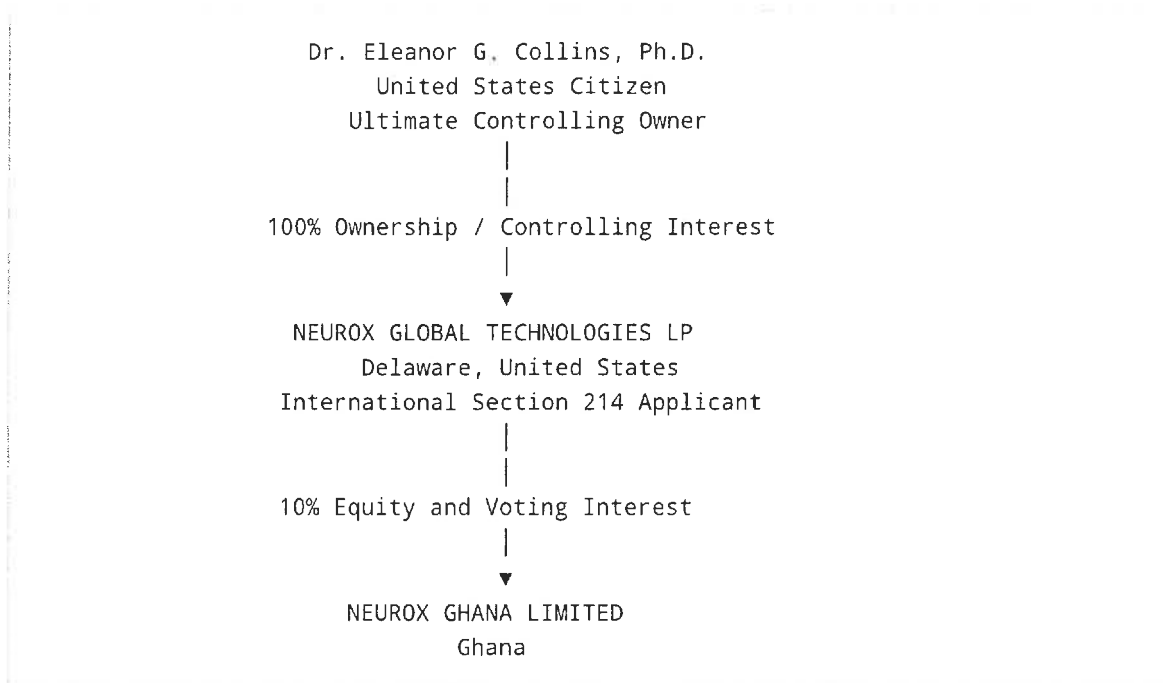
FCC File No.: ITC-214-20260108-00008  
International Section 214 Application  
47 C.F.R. § 63.18(h) and § 63.10

#### I. NeuroX Global Technologies LP

NeuroX Global Technologies LP ("NeuroX" or "Applicant") is a limited partnership organized under the laws of the State of Delaware, United States.

**Dr. Eleanor G. Collins, Ph.D.**, a United States citizen, is the ultimate controlling owner of NeuroX Global Technologies LP and holds **100% of the ownership and controlling interest in the Applicant**.

The Applicant's ownership structure is:



#### II. Relationship to NeuroX Ghana Limited

NeuroX Global Technologies LP holds a **10% equity and voting interest in NeuroX Ghana Limited**, a company organized under the laws of Ghana.

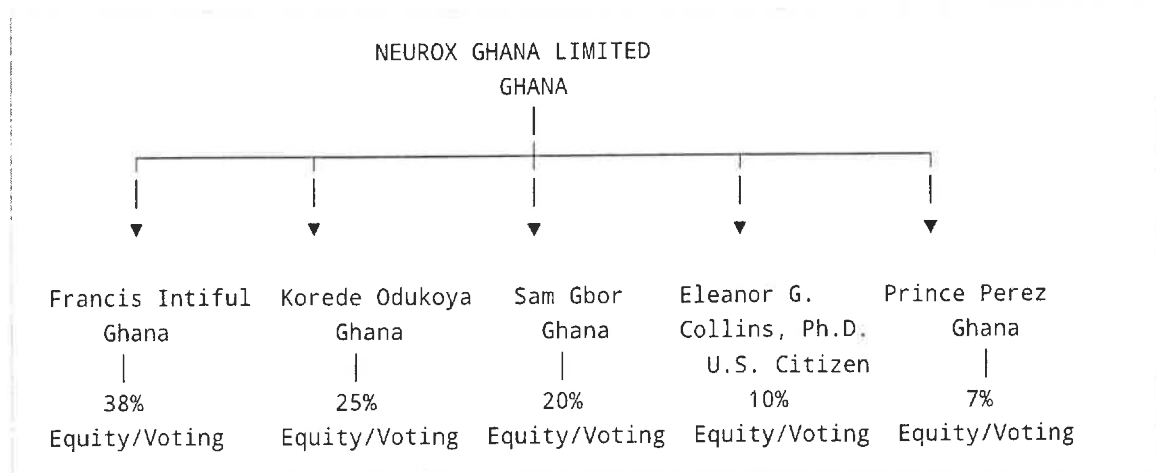
NeuroX Global Technologies LP does **not** hold a majority ownership interest in NeuroX Ghana Limited. The Applicant's interest is limited to its stated **10% equity and voting interest**, and the Applicant does not represent that it exercises contractual, de facto, or other actual control over NeuroX Ghana Limited solely by reason of this 10% interest.

### III. Ownership of NeuroX Ghana Limited

The ownership and voting interests in NeuroX Ghana Limited are as follows:

| Owner                                | Citizenship   | Equity Interest | Voting Interest |
|--------------------------------------|---------------|-----------------|-----------------|
| <b>Francis Intiful</b>               | Ghana         | <b>38%</b>      | <b>38%</b>      |
| <b>Korede Odukoya</b>                | Ghana         | <b>25%</b>      | <b>25%</b>      |
| <b>Sam Gbor</b>                      | Ghana         | <b>20%</b>      | <b>20%</b>      |
| <b>Dr. Eleanor G. Collins, Ph.D.</b> | United States | <b>10%</b>      | <b>10%</b>      |
| <b>Prince Perez</b>                  | Ghana         | <b>7%</b>       | <b>7%</b>       |
| <b>TOTAL</b>                         | —             | <b>100%</b>     | <b>100%</b>     |

### IV. NeuroX Ghana Limited Ownership Diagram



### V. Ownership Disclosure Pursuant to 47 C.F.R. § 63.18(h)

Pursuant to 47 C.F.R. § 63.18(h), NeuroX Global Technologies LP provides this ownership information and diagram in response to the Federal Communications Commission's request for clarification concerning the Applicant's ownership and its relationship with NeuroX Ghana Limited.

Dr. Eleanor G. Collins, Ph.D., a United States citizen, is the ultimate controlling owner of NeuroX Global Technologies LP.

NeuroX Global Technologies LP's relationship with NeuroX Ghana Limited is based upon a **10% equity and voting interest**. NeuroX Global Technologies LP does not claim majority ownership of NeuroX Ghana Limited.

The remaining interests in NeuroX Ghana Limited are held by Francis Intiful (38%), Korede Odukoya (25%), Sam Gbor (20%), and Prince Perez (7%), each identified by the Applicant as a citizen of Ghana.

## **VI. Regulatory Classification Under 47 C.F.R. § 63.10**

NeuroX Global Technologies LP seeks to be regulated as a **non-dominant U.S. international carrier**, to the extent applicable under 47 C.F.R. § 63.10.

The Applicant's 10% equity and voting interest in NeuroX Ghana Limited should be distinguished from the Applicant's regulatory classification under § 63.10. The 10% interest is an ownership interest; non-dominant status concerns the regulatory classification of the U.S. international carrier for particular international telecommunications services and routes.

To the extent required by the Commission, NeuroX Global Technologies LP represents that it will provide information necessary for the Commission to determine its appropriate regulatory classification under § 63.10.

## **VII. Certification**

NeuroX Global Technologies LP certifies that the ownership information contained in this Attachment A is true and correct to the best of the Applicant's knowledge, information, and belief.

The Applicant respectfully submits this Attachment A in response to the Commission staff's request for supplemental ownership information concerning **FCC File No. ITC-214-20260108-00008**.

Respectfully submitted,

**NEUROX GLOBAL TECHNOLOGIES LP**

By: 

**Dr. Eleanor G. Collins, Ph.D.**

Chief Executive Officer

NeuroX Global Technologies LP

Date: 