

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.

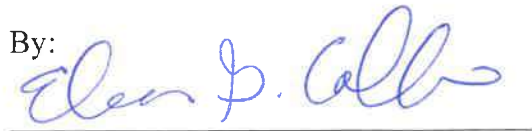
Conclusion

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: Aug. 17, 2026

SUPPLEMENTAL CLARIFICATION REGARDING NON-DOMINANT CLASSIFICATION

Applicant: NeuroX Global Technologies LP

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

Foreign Carrier: NeuroX Ghana Limited (Ghana)

Purpose of Clarification

NeuroX Global Technologies LP (the “Applicant”) submits this clarification to address 47 C.F.R. § 63.10(a)(2) through (4), to state whether the Applicant satisfies the applicable criteria for non-dominant classification, and to clarify its certification under 47 C.F.R. § 63.18(k) concerning whether NeuroX Ghana Limited possesses market power.

47 C.F.R. § 63.10(a)(2) - Exact Language

“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; and”

Applicant's response: The Applicant states that this dominant-carrier presumption is **not triggered**. NeuroX Ghana Limited is not a monopoly provider of communications services in a relevant market in Ghana. Accordingly, the Applicant does not meet the condition that would cause presumptive dominant classification under § 63.10(a)(2).

47 C.F.R. § 63.10(a)(3) - Exact Language

“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.”

Definition of market power - 47 C.F.R. § 63.09(f): “Market power means sufficient market power to affect competition adversely in the U.S. market.”

Applicant's response: The Applicant states that it **meets the criteria for presumptive non-dominant classification under § 63.10(a)(3)** because NeuroX Ghana Limited is not a monopoly provider and lacks sufficient market power on the foreign end of the U.S.-Ghana route to affect competition adversely in the U.S. market.

Required market-power showing: The Applicant further represents that NeuroX Ghana Limited has less than 50 percent market share in both (1) the international transport market and (2) the local access market on the foreign end of the U.S.-Ghana route. These are the market-share benchmarks specified in § 63.10(a)(3) for presumptive non-dominant treatment.

Supporting information: The Applicant acknowledges that § 63.10(a)(3) places the burden on the Applicant to submit information sufficient to demonstrate the foreign affiliate's lack of market power. The Applicant's 10% equity and voting interest in NeuroX Ghana Limited is an ownership fact and is not, by itself, evidence of NeuroX Ghana Limited's market share. The Applicant therefore relies on company records, licensing/operational records, customer or traffic data, and/or competent Ghana regulatory market data demonstrating that NeuroX Ghana Limited remains below the 50% thresholds in the relevant international transport and local access markets. Such supporting evidence should accompany or be incorporated into the filing to the extent required by Commission staff.

47 C.F.R. § 63.10(a)(4) - Exact Language

“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. A carrier regulated as non-dominant pursuant to this subparagraph shall notify the Commission at any time that it begins to provide such service through the resale of an affiliated U.S. facilities-based carrier's international switched services. The carrier will be deemed a dominant carrier on the route absent a Commission finding that the carrier otherwise qualifies for non-dominant regulation pursuant to this section.”

Applicant's response: Section 63.10(a)(4) applies only if the Applicant provides the relevant international switched service solely through resale of an unaffiliated U.S. facilities-based carrier's international switched services. **To the extent the Applicant's service is provided solely in that manner, the Applicant meets § 63.10(a)(4) and is presumptively non-dominant for that authorized service.** If the Applicant does not provide service solely through qualifying resale, it does not rely on § 63.10(a)(4) and instead relies on the market-power showing under § 63.10(a)(3).

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

The Applicant expressly clarifies its certification concerning the foreign carrier's market power. **NeuroX Ghana Limited does not have market power for purposes of § 63.18(k).** More specifically, the Applicant certifies that 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, using the definition of “market power” 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 has less than 50 percent market share in the relevant international transport and local access markets. Accordingly, the Applicant's response under § 63.18(k) is **No - the affiliated foreign carrier does not possess market power.**

Summary of Applicant's Position

Provision	Applicant's Position
§ 63.10(a)(2)	Dominant presumption not triggered; NeuroX Ghana Limited is not a monopoly provider.
§ 63.10(a)(3)	Applicant states it meets the criterion: foreign affiliate lacks market power and is below the 50% international-transport and local-access benchmarks, subject to supporting evidence.
§ 63.10(a)(4)	Applies only if service is provided solely through qualifying resale of an unaffiliated U.S. facilities-based carrier's switched services.
§ 63.18(k)	No - NeuroX Ghana Limited does not possess market power.

Conclusion

For the foregoing reasons, NeuroX Global Technologies LP respectfully submits that the dominant presumption in § 63.10(a)(2) is not triggered; that the Applicant satisfies the criteria for presumptive non-dominant classification under § 63.10(a)(3), subject to the supporting market-power information described above; and that § 63.10(a)(4) applies only to the extent the Applicant provides service solely through qualifying resale. The Applicant further clarifies under § 63.18(k) that NeuroX Ghana Limited does not possess market power.

Certification: The foregoing factual representations are made to the best of the Applicant's knowledge, information, and belief and should be submitted only if confirmed as true and correct by the Applicant's records and supporting information.

ATTACHMENT A

OWNERSHIP STRUCTURE AND FOREIGN ENTITY RELATIONSHIP

NeuroX Global Technologies LP

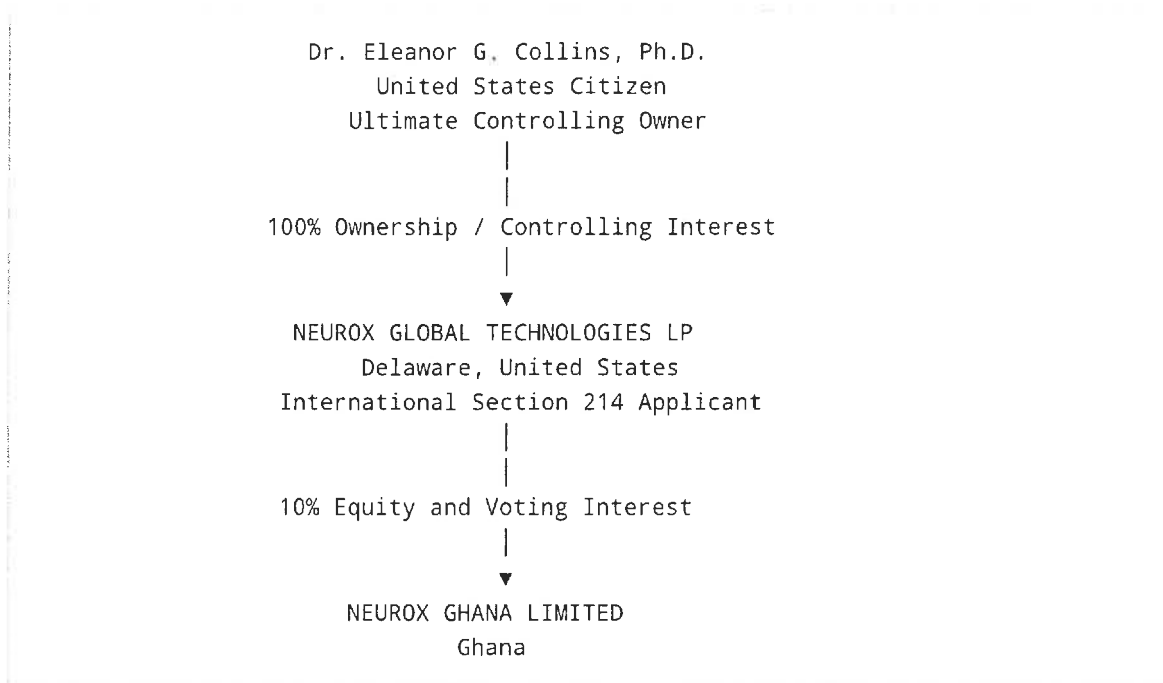
FCC File No.: ITC-214-20260108-00008
International Section 214 Application
47 C.F.R. § 63.18(h) and § 63.10

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.

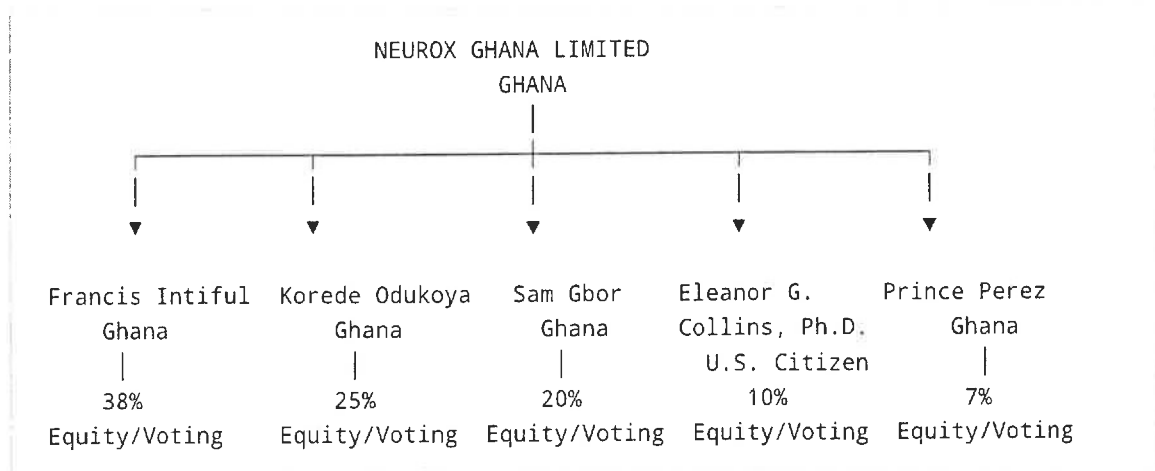
NeuroX Global Technologies LP does **not** hold a majority ownership interest in NeuroX Ghana Limited. The Applicant's interest is limited to its stated **10% equity and voting interest**, and the Applicant does not represent that it exercises contractual, de facto, or other actual control over NeuroX 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
Francis Intiful	Ghana	38%	38%
Korede Odukoya	Ghana	25%	25%
Sam Gbor	Ghana	20%	20%
Dr. Eleanor G. Collins, Ph.D.	United States	10%	10%
Prince Perez	Ghana	7%	7%
TOTAL	—	100%	100%

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: 