

Answer to Question 10:

(c) Correspondence concerning this Application should be sent to:

Jeremy Sands
Manager/Member
Ignition Wireless, LLC
5400 Carillon Point
Kirkland, WA, 98033
Telephone: (208) 789 - 6443
E-Mail: jeremy@telspace.com

With a copy to:

Katherine Barker Marshall
Arent Fox LLP
1717 K Street, NW
Washington, DC 20006
Telephone: (202) 857-6104
Facsimile: (202) 857-6395
E-mail: katherine.marshall@arentfox.com

For Mobile Net:

Avi Sharoz Yroshalmiane
President
Mobile Net POSA, Inc. d/b/a Expo Mobile and Jolt Mobile
824 Wilshire Boulevard
Los Angeles, California 90017
Telephone: (310) 600-1050
E-Mail: avi@netincusa.com

With copies to:

Benjamin Kiss
Fischer Zisblatt & Kiss
1901 Avenue of the Stars, Suite 1020
Los Angeles, CA 90067
Telephone: (310) 785-1111
Facsimile: (310) 785-2211

(d) Mobile Net holds an international Section 214 license, pursuant to FCC File No. ITC-214-20131219-00348, which it will maintain post-close. Ignition does not hold Section 214 authority, and is requesting this authority as part of this Application.

Attachment 1 – Asset Transfer between Mobile Net POSA, Inc. and Ignition Wireless, LLC

Answer to Question 11:

(h) Following consummation of this Transaction, Mobile Net’s Expo Mobile customers will be transferred from Mobile Net to Ignition. Mobile Net will retain its authority to provide international services in order to continue to serve the customers it will retain under the Jolt Mobile name.

The following persons and/or entities may assert a 10% or more ownership interest in Ignition post-closing of this Transaction:

Name: Jay Powers
Address: 18931 NE 150th Street Woodinville, WA 98072
Citizenship: U.S. Citizen
Principal Business: Investments and Finance
Ownership Interest: 22%

Name: telSPACE, LLC
Address: 5400 Carillon Point, Kirkland, WA, 98033
Citizenship: Washington State Limited Liability Company
Principal Business: Software
Ownership Interest: 44%

Through their interest in telSPACE, LLC, the following individuals may assert a 10% or more ownership interest in Ignition:

Name: Jeremy Sands
Address: 5400 Carillon Point, Kirkland, WA, 98033
Citizenship: U.S. Citizen
Ownership Interest: 12%
Primary Business: Software

Name: Paris Holt
Address: 5400 Carillon Point, Kirkland, WA, 98033
Citizenship: U.S. Citizen
Ownership Interest: 11%
Primary Business: Software

No other individual or entity may assert a 10% or more control or interest in Ignition.

Answer to Question 13:

Ignition Wireless, LLC [FRN: 0025103458] (“Ignition”) and Mobile Net POSA, Inc. (“Mobile Net”, collectively with Ignition, “Applicants”), [FRN: 0022692040], by their counsel and pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. §214 (the “Act”), and Sections 63.12, 63.18, and 63.24 of the Commission’s Rules, 47 CFR §§ 63.12,

63.18, and 63.24, hereby respectfully request that the Federal Communications Commission (“Commission”) grant them the authority necessary to consummate a transaction involving the transfer certain assets of Mobile Net, including the customer base associated with Mobile Net’s fictitious name “Expo Mobile” (“Expo”).¹ Post-close, Ignition will continue to use the “Expo Mobile” name to provide service to the affected customers.

Mobile Net operates as a Mobile Virtual Network Operator (“MVNO”), reselling wireless services to its customers on a prepaid basis. It holds authority to provide international services pursuant to an authorization issued by the Commission in File No. ITC-214-20131219-00348.² Because Mobile Net will continue to offer services under its “Jolt Mobile” name, Mobile Net will continue to maintain its international services authorization.

Ignition does not currently offer telecommunications services, and seeks both approval of this Transaction and the issuance of its own authority to provide international telecommunications services.

Applicants respectfully request approval of this Application no later than **December 30, 2015**.

Pursuant to an Asset Purchase Agreement, dated December 3, 2015 (“Agreement”), by and among Mobile Net POSA, Inc. and Ignition (the “Transaction”), Ignition will acquire certain assets, including prepaid wireless customers and the “Expo Wireless” trade name from Mobile Net. Ignition will also acquire the underlying resale wireless contracts to serve the Expo customer base, so there will be no change in network availability for the affected customers. Finally, Ignition will formally add the fictitious name “Expo Wireless” and continue to provide service to the existing customers under that name.

The proposed Transaction will have no adverse impact on the customers. Expo’s customers will continue to receive their existing services at the same rates, terms and conditions that they have prior to the transfer and any future changes in the rates, terms and conditions of service will be made consistent with Commission requirements. As part of the Transaction, Mobile Net will assign the underlying carrier contracts that it uses to serve the current Expo customers to Ignition to ensure that the Expo customers will continue to have access to the same network. Finally, Expo will be managed by personnel with significant experience in the telecommunications industry and may realize additional infusion of capital to support further expansion of Expo’s current operations.

The Transaction described in this Application is in the public interest. Customers will continue to receive their services from Expo, under the same rates, terms and conditions, and will

¹ Mobile Net provides prepaid resold cellular services under two fictitious names, “Jolt Mobile” and “Expo Mobile.” The present Transaction includes only those customers associated with the “Expo Mobile” name, as well as the underlying wireless resale contracts currently used to service those customers. Current Mobile Net customers that receive service under the “Jolt Mobile” name will continue to be served by Mobile Net.

² Mobile Net’s services are exclusively resold wireless. As such, Mobile Net does not hold any other FCC licenses that are affected by this Transaction.

retain access to their current network. In addition, Ignition will add “Expo Mobile” as a fictitious name to service the current Expo customers. Expo will continue to be managed by persons with significant experience in the telecommunications industry. Further, this transaction may provide Expo with additional capital to support and expand its operations.

The Applicants note that there are a number of other wireless carriers operating in each market. Further, the services provided are prepaid resold wireless services, meaning there are no contracts at issue, rather, customers pay for their services monthly in advance, and affirmatively renew their service, as well as accept the terms of service.

Answer to Question 20:

The Applicants respectfully request streamlined treatment of this Application, pursuant to Section 63.12 of the Commission’s Rules, 47 C.F.R. § 63.12. This Application is eligible for streamlined processing under Section 63.12, because, in accordance with Section 63.12(c): (1) post-close, Ignition will not be affiliated with any foreign carrier; (2) Ignition is not affiliated with any dominant U.S. carrier whose international switched or private line services Ignition seeks authority to resell, nor will Ignition be so affiliated post-close; and (3) none of the other provisions contained in Section 63.12(c) of the Commission’s Rules, 47 C.F.R. §63.12, apply. Applicants respectfully request approval of this Application no later than **December 30, 2015**.