

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

ATTACHMENT 1

ANSWER TO QUESTION 10

89Degree Networks, LLC (“89Degree Networks”), pursuant to Section 214(a) of the Communications Act,¹ hereby requests Special Temporary Authority (“STA”) for a period of sixty (60) days to allow 89Degree Networks to continue providing service to customers pending approval of the applications filed for transfer of control of 89Degree Networks’ international and domestic Section 214 authority.²

On June 13, 2016, 89Degree Networks filed an application for Federal Communications Commission (“FCC” or “Commission”) consent to the transfer of control of domestic and international Section 214 authority held by 89Degree Networks, File No. ITC-T/C-20160613-00167.³ As explained in the pending transfer of control application, on December 31, 2015, Robert Crinks, who previously held a 4 percent interest in 89Degree Networks, acquired a 51 percent interest in the company from his spouse, Elaina Mangione, to bring his total ownership interest to 55 percent.

Prior approval for the transaction was not sought because neither Ms. Mangione nor Mr. Crinks understood that control had been transferred by virtue of their being married and Mr. Crinks continuing to exercise control in his capacity as President of the company.⁴ 89Degree Networks regrets any misunderstanding, and will ensure that prior FCC consent is obtained for any future transfers of control.

Grant of the STA is in the public interest because it will allow 89Degree Networks to continue providing service to customers pending approval of the pending transfer of control applications.

89Degree Networks acknowledges that grant of its request for Special Temporary Authority will not prejudice action by the Commission, or other reviewing agencies, on the underlying Section 214 transfer of control application. 89Degree Networks also acknowledges that any authority granted pursuant to this request is subject to cancellation or modification upon notice, but without a hearing.

¹ 47 U.S.C. § 214(a).

² 89Degree Networks withdraws its request for waiver of Section 63.24(e) of the Commission’s rules, which requires prior FCC approval for a transfer of control. 47 C.F.R. § 63.24(e).

³ 89Degree Networks’ domestic Section 214 transfer of control application is pending in Docket No. 16-193.

⁴ Compare 47 C.F.R. § 63.24(d), note 2 (identifying as a type of transaction that is “presumptively pro forma” a “[c]orporate reorganization that involves no substantial change in the beneficial ownership of the corporation ...”), with 47 C.F.R. § 1.2110(c)(5)(iii)(A) (“Both spouses are deemed to own or control or have the power to control interests owned or controlled by either of them”).

ANSWER TO QUESTION 16

Section 63.18(d):

89Degree Networks holds the international Section 214 authorization that is the subject of this application, File No. ITC-214-20120514-00127 (authorization to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules).

Section 63.18(e)(3):

89Degree Networks is not applying for authority to acquire facilities or to provide services not covered by Sections 63.18(e)(1) and (e)(2) of the Commission's rules, nor is it seeking additional authority under Section 63.18(e)(3).

Section 63.18(g):

Not applicable.

ATTACHMENT 2

ANSWER TO QUESTION 15

The following individuals and entity own a ten percent or greater equity and voting interest in 89Degree Networks:

Robert A. Crinks
11801 Foxclove Road
Reston, VA 20191
Citizenship: United States
Principal Business: President of 89Degree Networks
Ownership: 55% direct interest in 89Degree Networks

Valley Technologies Trust (“VTT”)
12353 Sunrise Valley Dr.
Reston, VA 20191
Citizenship: Wyoming
Principal Business: Telecommunications Consulting
Ownership: 45% direct interest in 89Degree Networks

Mohamed Elagazy
1620 Admirals Hill Ct.
Vienna, VA 22181
Citizenship: United States
Principal Business: Sole trustee and beneficiary of VTT
Ownership: 100% direct interest in VTT; 45% indirect interest in 89Degree Networks.

No other entities or individuals own a ten percent or greater direct or indirect interest in 89Degree Networks.

89Degree Networks does not have any interlocking directorates.