

# Nelson Mullins

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December 14, 2011

## Via IBFS

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554  
Attention: International Bureau

Re: Supplement to Petition for Declaratory Ruling ISP-PDR-20111020-00011  
& Transfer of Control Application ITC-T/C-20111107-00349

Dear Ms. Dortch:

On behalf of Software Cellular Network (North America) Ltd., we are filing the enclosed Response to Question 4 as a supplement to the above-referenced petition for declaratory ruling and transfer of control application. Please contact me if you have any questions regarding the enclosed document.

Respectfully submitted,



Thomas F. Bardo  
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101 Constitution Avenue, NW, Suite 900  
Washington, D.C. 20001  
*Counsel for Software Cellular Network  
(North America) Ltd.*

TFB:gt  
Enclosure

cc: Susan O'Connell, Esq. (w/encl.) (via email).

Response to Question 4

Somercourt Investments Limited holds a 10.91 percent ownership interest in Truphone Limited ("Truphone"):

Somercourt Investments Limited  
Second Floor  
28 Lime Street  
London EC3M 7HR  
United Kingdom  
Organization: limited liability company organized under the laws of  
England & Wales  
Business: investments

Somercourt Investments Limited is a nominee company which holds the investments of Somercourt Services, a partnership formed under English law. A number of individuals and entities hold partnership interests in Somercourt Services. George Robinson holds a controlling interest in Somercourt Services:

George Robinson  
20 St. Dunstan's Hill  
London EC3R 8HL UK  
Citizenship: British  
Business: investments

Vollin Holdings Limited holds a 58.81 percent ownership investment in Truphone:

Vollin Holdings Limited  
Geneva Place, Waterfront Drive  
P.O. Box 3469, Road Town, Tortola  
British Virgin Islands  
Organization: British Virgin Islands Business Company  
Business: investment holding company

Whiteclif Enterprises Limited is the 100 percent shareholder of Vollin Holdings Limited:

Whiteclif Enterprises Limited  
Trident Chambers, P.O. Box 146  
Road Town, Tortola  
British Virgin Islands  
Organization: British Virgin Islands  
Business: investment holding company

Whiteclif Enterprises is beneficially owned by the following two Russian citizens:

Alexander Frolov (less than 50 percent interest)

Alexander Abramov (greater than 50 percent interest)

Business: investments