

Attachment 1 – Supplementary Filing

4. Answer to Question 13 (Narrative of Proposed Transfer of Control)

Pursuant to a planned reorganization of Opextel, LLC (“Opextel”), 123.COM.VE C.A. (“123.COM.VE”) and NGS Telecom Holding LLLC (“NGS”) completed an intra-corporate reorganization on January 17, 2013. This transaction is a transfer of control pursuant to Section 63.24(c) of the Commission’s rules because it involves a transaction in which the authorization remains held by the same entity, but there is a change in the entity that controls the authorization holder. Further, this transfer of control is *pro forma* because both 123.COM.VE and NGS are ultimately wholly owned by Mr. Jesus Calderas and there is no change in the ultimate control of Opextel, as set forth in Section 63.24(d) of the Commission’s rules. *See* 47 C.F.R. § 63.24(d), Note 2.

Specifically, 123.COM.VE is wholly owned by Double E Investments, LTD, BVI a holding company. Double E Investments, in turn, is wholly owned by Mr. Jesus Calderas. NGS, on the other hand, is wholly owned by Oceania Management Corp, a holding company. Oceania Management, in turn, is wholly owned by a New Zealand Trust whose sole beneficiary is Mr. Jesus Calderas.