

**ANSWER TO QUESTION 10 – Section 63.18(c)-(d):**

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

Paul Moore  
TelePunkte, LLC  
101 Waukegan Rd., Ste. 990  
Lake Bluff, IL 60044  
Telephone: 224-544-5567  
Facsimile: 847-574-5934  
Email: telepunte@gmail.com

With a copy to:

Jennifer D. Hindin  
Wiley Rein LLP  
1776 K Street, NW  
Washington, DC 20006  
Telephone: 202-719-7000  
Facsimile: 202-719-7049  
Email: jhindin@wileyrein.com

(d) TelePunkte, LLC (“TelePunkte”), a limited liability company organized in the State of Delaware, holds the international Section 214 authorizations that are the subject of this notification: File No. ITC-214-20121112-00286 (authority to provide global facilities-based and resale services) and File No. ITC-214-20121128-00314 (authority to provide facilities-based service to Cuba).

Cobalt Holdings, Inc. (“Cobalt”), a corporation organized in the State of Delaware, does not hold any international Section 214 authorizations.

**ANSWER TO QUESTION 11 – Section 63.18(h)**

The individuals that own and control TelePunkte are the same individuals that will own and control Cobalt. Specifically, the following individuals directly hold greater than 10% of the equity and voting interests in Cobalt.

<b>Name:</b>	<b>Address:</b>	<b>Citizenship:</b>	<b>Principal Business:</b>	<b>%:</b>
Paul A. Moore	500 N. Waukegan Rd. Lake Forest, IL 60045	USA	Finance & Telecommunications	28.82%
Jeffrey Wattenberg	1187 Coast Village Rd Ste. 319 Santa Barbara, CA 93108	USA	Finance & Telecommunications	16.0%

Gregory Glyman	One North Wacker Dr. Ste. 2500 Chicago, IL 60606	USA	Finance	16.10%
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No other person or entity holds a direct or indirect equity or voting interest greater than 10% in Cobalt.

**ANSWER TO QUESTION 13 – Narrative for Transfer of Control and Public Interest Statement**

The *pro forma* transfer of control that is the subject of this notification is the result of an internal corporate restructuring. Specifically, TelePuede has rearranged its operations into a holding company structure by inserting a newly formed holding company, Cobalt, as the parent company of TelePuede. As a result of this restructuring, TelePuede will become a direct and wholly-owned subsidiary of Cobalt. The individuals that own and control Cobalt are the same individuals that own and control TelePuede.

Because ultimate ownership of TelePuede remains the same before and after the corporate reorganization, the restructuring is *pro forma* in nature. The Commission has previously stated that “[r]egulatory review of [pro forma] transactions yields no significant public interest benefits, but may delay or hinder transactions that could provide substantial financial, operational, or administrative benefits for carriers.”<sup>1</sup> Accordingly, Section 63.24(f) of the FCC’s rules permits this *pro forma* transfer without prior Commission approval.

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<sup>1</sup> 1998 Biennial Review – Review of International Common Carrier Regulations, Report and Order, 14 FCC Rcd 4909, ¶ 42 (1999).