

**ANPI, LLC; ANPI Business, LLC; Zone USA, Inc.
Notification of Pro Forma Transfer of Control
Attachment 1 (Page 1 of 5)**

ANPI, LLC (“ANPI”), ANPI Business, LLC (“ANPI Business”), and Zone USA, Inc. (“Zone USA”) hereby notify the Commission of a pro forma transfer of control from e-Kong Group Limited (“e-Kong”), a Bermuda company that is publicly traded in Hong Kong, to an affiliated British Virgin Islands (“BVI”) holding company, Distacom International Limited (“Distacom” or “Transferee”), under the common control of one of e-Kong’s substantial shareholders at the time of the transaction. The transaction was consummated on January 22, 2015.

Each of the three affiliated entities holds its own international Section 214 authorization and will be filing separate, concurrent notifications with respect to the pro forma transaction described herein.

ANSWER TO QUESTION 10:

In response to 47 C.F.R. § 63.18(c):

Please direct all correspondence concerning this notification to the following legal counsel:

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Information for the Transferee:

Richard John Siemens
Chairman
Distacom Group
Unit C, 26/F, CNT Tower
338 Hennessy Road
Wanchai, Hong Kong
+852 2572 8288

Information for the transferor:

Mr. Lim Shyang Guey
Managing Director
e-Kong Group Limited
3705 Gloucester Tower, The Landmark
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**ANPI, LLC; ANPI Business, LLC; Zone USA, Inc.
 Notification of Pro Forma Transfer of Control
 Attachment 1 (Page 2 of 5)**

In response to 47 C.F.R. § 63.18(d):

The following table describes the international Section 24 authorizations held by each applicant entity.¹ As described in the table, the Commission’s IBFS database contains errors as to the entity holding certain authorizations.

Correct Licensee / FRN	Incorrectly listed in IBFS as:	File Number	Type of Authority
Zone USA, Inc. 0012808887	ANPI Business, LLC 0012808887	ITC-214-19970311-00142	63.18(e)(2) (resale)
ANPI Business, LLC 0020320347	Zone Telecom, LLC 0020320347	ITC-214-20000717-00403	63.18(e)(1) (facilities-based) & 63.18(e)(2) (resale)
ANPI, LLC 0020321576	N/A	ITC-214-19960209-00017	63.18(e)(2) (resale)

Pursuant to the transaction consummated under File No. ITC-ASG-20101013-00399,² Zone USA should have retained the international Section 214 authorization under File No. ITC-214-19970311-00142.³ Pursuant to the same transaction, the international Section 214 authorization under File No. ITC-214-20000717-00403 was assigned to Zone Telecom, LLC which subsequently changed its name to ANPI Business, LLC. It appears that the name change was applied to the incorrect FRN and international Section 214 file number, resulting in the current discrepancies in the IBFS database (and CORES). The parties request that the CORES and IBFS discrepancies be corrected as part of this notification.

ANSWER TO QUESTION 11:

The following person holds, directly, at least ten (10) percent of the equity in Distacom, the Transferee:

Name / Address	% Shares	Citizenship	Principal Business
Richard John Siemens Unit C, 26/F, CNT Tower 338 Hennessy Road Wanchai, Hong Kong	100%	Canada	Telecommunications

¹ Distacom has not previously received authority under Section 214 of the Act. e-Kong has not directly received authority under Section 214 of the Act, but has indirectly held such authority by virtue of its prior ownership in the applicant entities.

² See International Authorizations Granted, Public Notice, Report No. TEL-01486, DA No. 11-471 (rel. Mar. 10, 2011).

³ Zone USA currently does not provide any services under this authorization.

**ANPI, LLC; ANPI Business, LLC; Zone USA, Inc.
Notification of Pro Forma Transfer of Control
Attachment 1 (Page 3 of 5)**

ANSWER TO QUESTION 12:

The Transferee has no interlocking directorates with foreign carriers.

ANSWER TO QUESTION 13:

Pursuant to a Disposal Agreement consummated on January 22, 2015, all shares in e-Kong's wholly-owned indirect subsidiary, Zone Global Limited ("Zone Global"), a BVI company,⁴ were transferred to Distacom. Distacom is a BVI investment holding company that is wholly-owned by Mr. Richard Siemens. Mr. Siemens was also an executive Director, Chairman of the Board and a substantial shareholder of e-Kong.⁵ In these capacities, Mr. Siemens exercised *de facto* control over Zone Global and Zone USA prior to the transaction. Pursuant to this pro forma transfer of control,⁶ Mr. Siemens now also assumes *de jure* equity ownership of Zone Global and Zone USA.

Zone USA and ANPI Holding, Inc. ("ANPI Holding"), an Illinois corporation, each hold 50% interest in ANZ Communications LLC ("ANZ"), a Delaware limited liability company.⁷ Both ANPI and ANPI Business are 100% direct subsidiaries of ANZ. ANZ is operated as a joint venture between Zone USA and ANPI Holding, with each having equal voting rights.⁸ Thus, while the January 22, 2015 transaction increased Mr. Siemens's attributable equity interest in ANZ (and thereby ANPI and ANPI Business), no actual change of control has occurred at the ANZ, ANPI or ANPI Business level. The ANZ board and management team remains the same as it was pre-transaction and continues to manage the affairs of ANPI and ANPI Business (the operating entities holding international Section 214 authorizations) without change.

⁴ Zone Global is the immediate 100% holding company of Zone USA. Both Zone Global and Zone USA do not conduct any business operations other than investment holding.

⁵ Prior to and at the time of the transaction, Mr. Siemens owned approximately a 24.6% shareholding interest in e-Kong, a publicly traded company. Until recently, Mr. Siemens was the company's single largest shareholder. Post-transaction, Mr. Siemens disposed of substantially all of his shares in e-Kong and resigned as an executive Director and Chairman of the Board.

⁶ See 47 C.F.R. § 63.24(d) (stating that transfers of control "that do not result in a change in the actual controlling party are considered non-substantial or pro forma."). See also, 47 C.F.R. § 63.24(d), Note 2 (describing presumptively pro forma transactions to include those involving "assignment from a corporation to a corporation owned or controlled by the assignor stockholders without substantial change in their interests").

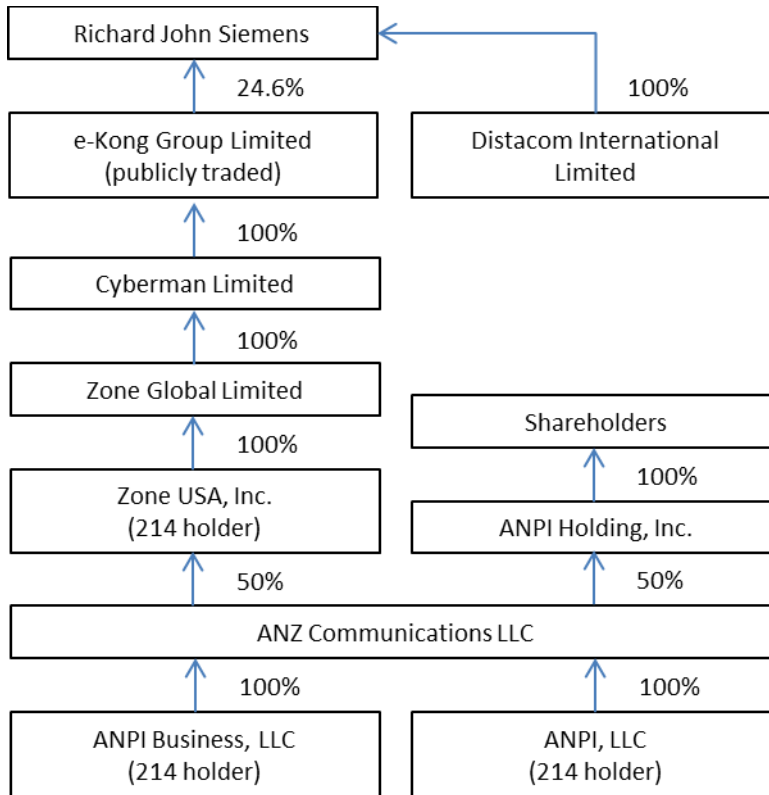
⁷ See File No. ITC-ASG-20101013-00399 for a description of the various transactions which resulted in the creation of ANZ.

⁸ Zone USA and ANPI Holding each have the ability to appoint three of the six board members who manage the affairs of ANZ. Mr. Siemens is currently also a board member for ANZ.

**ANPI, LLC; ANPI Business, LLC; Zone USA, Inc.
 Notification of Pro Forma Transfer of Control
 Attachment 1 (Page 4 of 5)**

Organizational charts showing the structure of the companies before and after the transaction are provided below.

PRE-TRANSACTION CORPORATE STRUCTURE



**ANPI, LLC; ANPI Business, LLC; Zone USA, Inc.
Notification of Pro Forma Transfer of Control
Attachment 1 (Page 5 of 5)**

POST-TRANSACTION CORPORATE STRUCTURE

