

## **KVH Services Transfer Application**

### **Answer to Question 10**

The name, title, post office address, and telephone number of the officer and any other contact point, such as legal counsel, to whom correspondence concerning the application is to be addressed.

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Colt, through its subsidiaries, holds 214 authorizations, file numbers ITC-214-20010406-00170 and ITC-214-19980126-00043, each of which authorize the provision of Global Facilities-Based and Global Resale services.

### **Answer to Question 11**

The assignee, Colt Group S.A., is a wholly owned subsidiary of Lightning Investors Limited:

Lightning Investors Limited  
Pembroke Hall  
42 Crow Lane  
Pembroke  
Bermuda HM-19

Jurisdiction of Incorporation: Bermuda  
Principal Business: Holding Company

SHM Lightning Investors LLC owns and controls approximately 71% of the issued share capital of Lightning Investors Limited. FIL Limited directly and indirectly owns and controls approximately 25% of the issued share capital of Lightning Investors Limited.

SHM Lightning Investors LLC  
255 State Street  
Boston, Massachusetts 02109

Principal Business: Telecommunications  
Holding Company  
Jurisdiction of Incorporation: Delaware

SHM Lightning Investors LLC is managed by Star Horizon Management LLC, which is controlled through various voting agreements by members of the family of Edward C. Johnson 3d (“Johnson Family”). SHM Lightning Investors LLC is owned by officers and senior employees of FMR LLC (a Delaware limited liability company doing business as Fidelity Investments), members of their families, including the Johnson Family, and trusts established for their benefit.

FIL Limited

Pembroke Hall  
42 Crow Lane  
Pembroke  
Bermuda HM-19

Principal Business: asset management serving retail, wholesale and institutional investors  
Jurisdiction of Incorporation: Bermuda

The largest holder of FIL’s outstanding voting stock is Pandanus Partners, L.P. (“Pandanus”). The ownership interest of Pandanus varies and can be anywhere from 25% - 48.5% of the interests of FIL. The ownership of Pandanus Partners L.P. is comprised of several entities and trusts for the benefit of descendants of the Johnson Family. Under the terms of the Pandanus partnership agreement, the voting of all FIL stock held by Pandanus is exclusively controlled by one of its general partners, Pandanus Associates, Inc. (“PAI”). On an individual basis no one person owns either directly or indirectly more than 25% of the voting stock of PAI. Therefore, on an individual basis no one person directly or indirectly owns or controls more than 25% of the voting stock of FIL.

**Answer to Question 13**

With this application, Colt Group S.A. is seeking approval, *nunc pro tunc*, for the transfer of control of KVH Services LLC (“KVH”) to Colt. The transaction was consummated on December 22, 2014 as a result of an all-cash transaction valued at approximately \$130 million in which Colt purchased all of the issued shares in KVH’s ultimate parent company, KVH Asia Limited. The transaction provided substantial public interest benefits because it enabled Colt to expand further its telecommunications services to its customers in the Asian market. In addition, on August 25, 2015, Colt changed KVH’s name to “Colt Technology Services LLC.” A diagram of the relevant portions of the transaction is provided as an Attachment to this narrative.

## Answer to Question 14

Prior to the acquisition of KVH by Colt, Colt and its affiliates provided telecommunications services either directly or on a reseller basis in the following non-U.S. countries:

ALGERIA	Latvia
ANGOLA	LIBERIA
ARGENTINA	Liechtenstein
AUSTRALIA	Lithuania
Austria	Luxembourg
BAHAMAS	MALAYSIA
BANGLADESH	MALTA
Belgium	MEXICO
BENIN	MONACO
Brazil	MOROCCO
Bulgaria	Netherlands
BURKINA FASO	NEW ZEALAND
BURUNDI	NIGERIA
CAMEROON	Norway
Canada	OTHER
CHILE	PERU
China	Poland
COLOMBIA	Portugal
CONGO	Romania
COTE D'IVOIRE	RUSSIA
Croatia	Russian Federation
CYPRUS	RWANDA
Czech Republic	SCOTLAND
Denmark	SENEGAL
Espanha	SERBIA
Estonia	SIERRA LEONE
Finland	SINGAPORE
France	SLOVAKIA
GAMBIA	Slovenia
Germany	South Africa
GHANA	Spain
Greece	Swaziland
GUINEA	Sweden
Hong Kong	Switzerland
Hungary	THAILAND
INDIA	TOGO
Ireland	TUNISIA
Israel	Turkey
Italy	UGANDA
IVORY COAST	UKRAINE
Japan	United Kingdom
KENYA	VIETNAM
KOREA, REPUBLIC OF	

## Answer to Question 15

Colt and its affiliates, including KVH, provides services either directly or on a reseller basis in the following non-U.S. countries:

ALBANIA
ALGERIA
ANGOLA
Argentina
ASIA GLOB
AUSTRALIA
AUSTRIA
BAHAMAS
BAHRAIN
BELGIUM
BENIN
BOSNIA AND HERZEGOVINA
BRAZIL
Bulgaria
BURKINA FASO
BURUNDI
CAMEROON
Canada
CHILE
China
COLOMBIA
CROATIA
CYPRUS
CZECH REPUBLIC
Denmark
EGYPT
Estonia
Finland
FRANCE
GAMBIA
GEORGIA
GERMANY
GHANA
Gibraltar
Greece
GUERNSEY
GUINEA
Hong Kong
HUNGARY
Iceland
India
INDONESIA
IRELAND

Israel
Italy
IVORY COAST
Japan
KENYA
Korea
KOREA, REPUBLIC OF
Latvia
LIBERIA
LIECHTENSTEIN
Lithuania
LUXEMBOURG
MALAYSIA
MALTA
MAURITIUS
MEXICO
MOLDOVA, REPUBLIC OF
MONACO
MOROCCO
Netherlands
NEW ZEALAND
Norway
PALESTINE, STATE OF
PERU
PHILIPPINES
Poland
PORTUGAL
ROMANIA
RUSSIA
RUSSIAN FEDERATION
RWANDA
SAUDI ARABIA
SCOTLAND
SERBIA
SIERRA LEONE
Singapore
SLOVAKIA
SLOVENIA
SOUTH AFRICA
Spain
SWEDEN
SWITZERLAND
Taiwan

Thailand
TOGO
TUNISIA
TURKEY
UGANDA

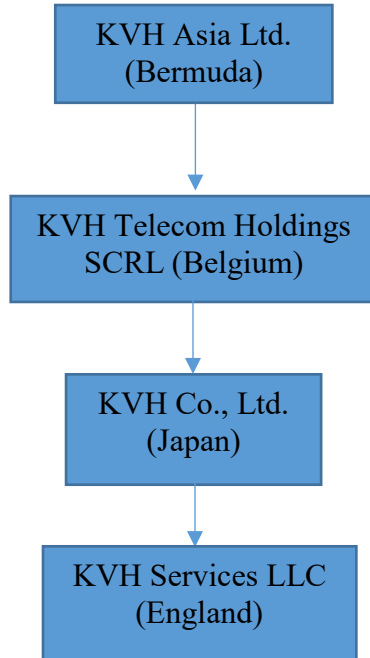
Ukraine
UNITED ARAB EMIRATES
UNITED KINGDOM
VIETNAM

### **Answer to Question 16**

Colt and its affiliates, including KVH, are non-dominant with respect to every destination country identified in Questions 14 and 15 pursuant to the criteria specified in Section 63.10 of the Commission's rules. The US related business for Colt is extremely small, with less than 1% of Colt's total revenue traffic relating to the US when compared with the remainder of the jurisdictions identified above. Consistent with this, Colt's international telecommunications traffic that either originates or terminates in the United States constitutes substantially less than 50 percent of the total traffic between the United States and each foreign country that Colt serves. Colt and its affiliates do not have market power on the foreign end of any route and therefore could not affect competition adversely in the U.S. market. Further, Colt is not affiliated with any carrier that has market power or is a monopoly provider of communications services in a relevant market in a destination country. Colt therefore seeks a determination by the Commission that it should be treated as non-dominant with respect to all markets for international telecommunications services.

**ATTACHMENT 1**

**Before:**



**After:**

