

December 1, 2020

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington D.C. 20554

Re: Consolidated Application for Consent to Transfer Control of Domestic and International 214 Authority Holder from Denis V. Raue to AppDirect, Inc., IBFS File No. ITC-T/C-20200710-00115, WCB Docket No. 20-229.

Dear Ms. Dortch:

Through undersigned counsel, applicant AppDirect, Inc. (“AppDirect”) further supplements the above-referenced application (“Application”) to transfer control of AppSmart TGN, Inc. (f/k/a Telegration, Inc.) (“Telegration”) from Denis V. Raue to AppDirect.

1. AppDirect confirms that PEG Digital Growth Fund II L.P., which owns a 13 percent economic (equity) interest and 5 percent voting interest in AppDirect, is a Delaware limited partnership. The “L.P.” in its name and its entity type were inadvertently omitted in the Application and the August 13, 2020, supplement.¹
2. AppDirect confirms that, to the best of its knowledge and based on public information, Mithril Capital Management LLC is manager appointee of the general partner of each of Mithril LP and Mithril II LP. Mithril LP and Mithril II LP each own a direct interest in AppDirect as previously disclosed. Mithril Capital Management LLC does not directly or indirectly own any interests in AppDirect. This supplement supersedes any information previously provided in the Application regarding Mithril Capital Management LLC. Based on publicly available information and as described in the

¹ See Letter from Stephanie Weiner to Marlene H. Dortch, Secretary, FCC, IBFS File No. ITC-T/C-20200710-00115, WC Docket No. 20-229 (filed Aug. 13, 2020).

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October 16, 2020, supplement,² Mithril LP and Mithril II LP are under the ultimate common control of Mr. Ajay Gopal Royan. Mr. Royan is a citizen of Canada.

3. This supplement updates the Commission on minor changes in the ownership percentages held by Mr. Nicolas Desmarais, and by Mr. Daniel Saks, in AppDirect. Nicolas Desmarais holds a direct 15% interest by equity and a direct 42% interest by vote in AppDirect. Daniel Saks holds a direct 9% interest by equity and a direct 31% interest by vote in AppDirect. The other ownership percentages stated in the October 16, 2020, supplement remain the same.

Should you have any questions regarding the information provided above, please contact Stephanie Weiner by telephone at 202-730-1344 or by email at sweiner@hwglaw.com; or Henry Shi by telephone at 202-730-1348 or by e-mail at hshi@hwglaw.com.

Yours sincerely,

/s/ Henry Shi
Stephanie Weiner
Henry Shi
Counsel for AppDirect, Inc.

Attachment

cc: Denise Coca
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Jodie May
Dennis Johnson
Gregory Kwan

² See Letter from Henry Shi to Marlene H. Dortch, Secretary, FCC, IBFS File No. ITC-T/C-20200710-00115, WC Docket No. 20-229, at 3-4 (filed Oct. 16, 2020).