

March 5, 2021

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”) 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, with respect to certain indirect 10 percent or greater owners of AppDirect, and to update minor changes to the respective ownership percentages, in both based on information obtained after the initial application and prior supplements. The information supersedes the 10 percent or greater direct and indirect ownership information previously provided.

AppSmart Agent Services, Inc. (“AppSmart Agent Services”)

Address: 650 California Street, Floor 25, San Francisco, CA 94108

Place of Organization: Delaware

General Business Type: referral services

Relationship: 100-percent voting and economic interest in Authority Holder.

Phone Number(s): 415-852-3919

AppSmart, Inc. (“AppSmart”)

Address: 650 California Street, Floor 25, San Francisco, CA 94108

Place of Organization: Delaware

General Business Type: cloud-based technology marketplace

Relationship: 100-percent voting and economic interest in AppSmart Agent Services.

Phone Number: 415-852-3919

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AppDirect, Inc. (“AppDirect”)

Address: 650 California Street, Floor 25, San Francisco, CA 94108
Place of Organization: Delaware
General Business Type: business-to-business cloud marketplace and cloud management services
Relationship: 100-percent voting and economic interest in AppSmart.
Phone Number: 415-852-3919

Nicolas Desmarais

Business Address: 650 California Street, 25th Floor, San Francisco, CA 94108
Relationship: 11.7-percent economic (equity) interest and 41-percent voting interest in AppDirect. Founder and co-CEO of AppDirect
Phone Number: 415-623-4946

Paul Desmarais Jr.

Business Address: 650 California Street, 25th Floor, San Francisco, CA 94108
Relationship: 15.9-percent economic (equity) interest and 4.9-percent voting interest in AppDirect through his majority ownership in each of Belvoir Investments Corp. (8.5% equity and 3.2% vote in AppDirect), Desfam Holdings Inc. (4.9% equity and 1.8% vote in AppDirect), and Belvoir Canada Inc. (2.5% equity and 0.9% vote in AppDirect).
Phone Number: 514-286-7440

Daniel Saks

Business Address: 650 California Street, 25th Floor, San Francisco, CA 94108
Relationship: 8.2-percent economic (equity) interest and 29.4-percent voting interest in AppDirect
Phone Number: 415-271-1671

PEG Digital Growth Fund II L.P.

Address: JP Morgan Asset Management, Private Equity Group, 320 Park Avenue, 15th Floor, NY1-U016, New York, NY 10022
Place of Organization: Delaware
General Business Type: Investment company
Relationship: 12.4-percent economic (equity) interest and 4.6-percent voting interest in AppDirect.
Phone Number: 800-343-1113

Digital Growth II GP LLC

Address: c/o JP Morgan Asset Management, Private Equity Group, 320 Park Avenue, 15th Floor, NY1-U016, New York, NY 10022
Place of Organization: Delaware
General Business Type: General partner of PEG Digital Growth Fund II L.P.

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Relationship: Control of PEG Digital Growth Fund II L.P. as its General Partner, Manager, Trustee, or Director
Phone Number: 800-343-1113

PEG Digital Growth Offshore Special II L.P.

Address: c/o JP Morgan Asset Management, Private Equity Group, 320 Park Avenue, 15th Floor, NY1-U016, New York, NY 10022
Place of Organization: Cayman Islands
General Business Type: Investment company
Relationship: Limited Partner with 46% equity interest and 0% voting interest in PEG Digital Growth Fund II L.P.
Phone Number: 800-343-1113

JPMorgan Investment Management Inc.

Address: JP Morgan Asset Management, Private Equity Group, 320 Park Avenue, 15th Floor, NY1-U016, New York, NY 10022
Place of Organization: Delaware
General Business Type: Investment management
Relationship: Investment advisor to PEG Digital Growth Fund II L.P.
Phone Number: 800-343-1113

JPMorgan Asset Management Holdings Inc.

Address: JP Morgan Asset Management, Private Equity Group, 320 Park Avenue, 15th Floor, NY1-U016, New York, NY 10022
Place of Organization: Delaware
General Business Type: Holding company
Relationship: 75% or greater ownership interest in JPMorgan Investment Management Inc.
Phone Number: 800-343-1113

JPMorgan Chase Holdings, LLC

Address: 277 Park Avenue, New York, NY 10172
Place of Organization: Delaware
General Business Type: Holding company
Relationship: 100% ownership interest in JPMorgan Asset Management Holdings Inc.
Phone Number: 800-343-1113

JPMorgan Chase & Co.

Address: 383 Madison Avenue, New York, NY 10179
Place of Organization: Delaware
General Business Type: Holding company
Relationship: 100% ownership interest in JPMorgan Chase Holdings, LLC
Phone Number: 800-343-1113

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Trident Fund Services Inc.

Address: Attn: Brian Visel, 1100 Abernathy Road NE, 500 Northpark Building, Suite 300,
Atlanta, GA 30328

Place of Organization: Georgia

General Business Type: Professional Services Company

Relationship: Managing Member of Digital Growth II GP LLC, which is General Partner of PEG
Digital Growth Fund II L.P., which holds 13% economic (equity) interest and 5 percent
voting interest in AppDirect.

Phone Number: 404-364-2019

Trident Trust Company (Cayman) Limited

Address: Attn: Randal Daije, One Capital Place, PO Box 847, Grand Cayman KY1-1103,
Cayman Islands

Place of Organization: Cayman

General Business Type: Professional Services Company

Relationship: Sole shareholder of Digital Growth II GP Ltd., which is General Partner of PEG
Digital Growth Offshore Special II L.P., which is a Limited Partner with 46% equity interest
and 0% voting interest in PEG Digital Growth Fund L.P., which holds 13% economic
(equity) interest and 5 percent voting interest in AppDirect.

Phone Number: +1 345-949-0880

TT (USA) Holdings, Inc.

Address: Attn: Brian Visel, 1100 Abernathy Road NE, 500 Northpark Buildings, Suite 300,
Atlanta, GA 30328

Place of Organization: Georgia

General Business Type: Holding Company

Relationship: Holds 85.7% ownership in Trident Fund Services, Inc., which is Managing
Member of Digital Growth II GP LLC, which is General Partner of PEG Digital Growth
Fund II L.P., which holds 13% economic (equity) interest and 5 percent voting interest in
AppDirect.

Phone Number: 404-364-2019

Viga Holdings (Luxembourg) S.A.

Address: Attn: David Bester, PO Box 175, 12-14 Finch Road, Douglas, Isle of Man, IM99 1TT

Place of Organization: Nevis

General Business Type: Holding Company

Relationship: Holding 100% ownership in TT (USA) Holdings, Inc., which holds 85.7%
ownership in Trident Fund Services, Inc., which is Managing Member of Digital Growth II
GP LLC, which is General Partner of PEG Digital Growth Fund II L.P., which holds 13%
economic (equity) interest and 5 percent voting interest in AppDirect.

Phone Number: +44 1624-646747

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Suttero AG

Address: Attn: David Bester, PO Box 175, 12-14 Finch Road, Douglas, Isle of Man, IM99 1TT
Place of Organization: Bahamas
General Business Type: Holding Company
Relationship: Holds 100% ownership in Viga Holdings (Luxembourg) S.A., which is holding company for TT (USA) Holdings, Inc., which holds 85.7% ownership in Trident Fund Services, Inc., which is Managing Member of Digital Growth II GP LLC, which is General Partner of PEG Digital Growth Fund II L.P., which holds 13% economic (equity) interest and 5 percent voting interest in AppDirect.
Phone Number: +44 1624-646747

Binder Investments Limited

Address: Attn: David Bester, PO Box 175, 12-14 Finch Road, Douglas, Isle of Man, IM99 1TT
Place of Organization: British Virgin Island
General Business Type: Holding Company
Relationship: Holds 85.7% ownership in Trident Trust Company (Cayman) Limited, which is sole shareholder of Digital Growth II GP Ltd., which is General Partner of PEG Digital Growth Offshore Special II L.P., which is a Limited Partner with 46% equity interest and 0% voting interest in PEG Digital Growth Fund L.P., which holds 13% economic (equity) interest and 5 percent voting interest in AppDirect.
Phone Number: +44 1624-646747

Pulse Holdings Inc.

Address: Attn: David Bester, PO Box 175, 12-14 Finch Road, Douglas, Isle of Man, IM99 1TT
Place of Organization: Nevis
General Business Type: Holding Company
Relationship: Holds 100% ownership in Binder Investments Limited, which holds 85.7% ownership in Trident Trust Company (Cayman) Limited, which is sole shareholder of Digital Growth II GP Ltd., which is General Partner of PEG Digital Growth Offshore Special II L.P., which is a Limited Partner with 46% equity interest and 0% voting interest in PEG Digital Growth Fund L.P., which holds 13% economic (equity) interest and 5 percent voting interest in AppDirect.
Phone Number: +44 1624-646747

TT Group Holdings Limited

Address: Attn: David Bester, PO Box 175, 12-14 Finch Road, Douglas, Isle of Man, IM99 1TT
Place of Organization: British Virgin Islands
General Business Type: Holding Company
Relationship: Holds 100% ownership in Pulse Holdings Inc., which holds 100% ownership in Binder Investments Limited, which holds 85.7% ownership in Trident Trust Company (Cayman) Limited, which is sole shareholder of Digital Growth II GP Ltd., which is General

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Partner of PEG Digital Growth Offshore Special II L.P., which is a Limited Partner with 46% equity interest and 0% voting interest in PEG Digital Growth Fund L.P., which holds 13% economic (equity) interest and 5 percent voting interest in AppDirect.

Phone Number: +44 1624-646747

The Trident Enterprise Ownership Trust

Address: Attn: David Bester, PO Box 175, 12-14 Finch Road, Douglas, Isle of Man, IM99 1TT

Place of Organization: Isle of Man

General Business Type: Trust

Relationship: Holds 100% ownership in TT Group Holdings Limited, which holds 100% ownership in Pulse Holdings Inc., which holds 100% ownership in Binder Investments Limited, which holds 85.7% ownership in Trident Trust Company (Cayman) Limited, which is sole shareholder of Digital Growth II GP Ltd., which is General Partner of PEG Digital Growth Offshore Special II L.P., which is a Limited Partner with 46% equity interest and 0% voting interest in PEG Digital Growth Fund L.P., which holds 13% economic (equity) interest and 5 percent voting interest in AppDirect.

Phone Number: +44 1624-646747

Teot Limited

Address: Attn: David Bester, PO Box 175, 12-14 Finch Road, Douglas, Isle of Man, IM99 1TT

Place of Organization: Isle of Man

General Business Type: Holding Company

Relationship: Trustee for the Trident Enterprise Ownership Trust, which holds 100% ownership in TT Group Holdings Limited, which holds 100% ownership in Pulse Holdings Inc., which holds 100% ownership in Binder Investments Limited, which holds 85.7% ownership in Trident Trust Company (Cayman) Limited, which is sole shareholder of Digital Growth II GP Ltd., which is General Partner of PEG Digital Growth Offshore Special II L.P., which is a Limited Partner with 46% equity interest and 0% voting interest in PEG Digital Growth Fund L.P., which holds 13% economic (equity) interest and 5 percent voting interest in AppDirect.

Phone Number: +44 1624-646747

Trident Nominees (I.OM.) Limited

Address: Attn: David Bester, PO Box 175, 12-14 Finch Road, Douglas, Isle of Man, IM99 1TT

Place of Organization: Isle of Man

General Business Type: Holding Company

Relationship: Holds 100% ownership in Teot Limited, which is Trustee for the Trident Enterprise Ownership Trust, which holds 100% ownership in TT Group Holdings Limited, which holds 100% ownership in Pulse Holdings Inc., which holds 100% ownership in Binder Investments Limited, which holds 85.7% ownership in Trident Trust Company (Cayman) Limited, which is sole shareholder of Digital Growth II GP Ltd., which is General Partner of PEG Digital Growth Offshore Special II L.P., which is a Limited Partner with

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46% equity interest and 0% voting interest in PEG Digital Growth Fund L.P., which holds 13% economic (equity) interest and 5 percent voting interest in AppDirect.
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Mithril LP

Address: 600 Congress Avenue, Suite 3100, Austin, TX 78701
Place of Organization: Delaware
General Business Type: Investment company
Relationship: 10% economic (equity) interest and 3.7 percent voting interest in AppDirect.
Phone Number: 512-717-3770

Mithril II LP

Address: 600 Congress Avenue, Suite 3100, Austin, TX 78701
Place of Organization: Delaware
General Business Type: Investment company
Relationship: 7.4% economic (equity) interest and 2.7 percent voting interest in AppDirect.
Phone Number: 512-717-3770

Mithril GP LLC

Address: 600 Congress Avenue, Suite 3100, Austin, TX 78701
Place of Organization: Delaware
General Business Type: General partner of Mithril LP
Relationship: Control of Mithril LP as its general partner
Phone Number: No publicly available information identified

Mithril II GP LP

Address: 600 Congress Avenue, Suite 3100, Austin, TX 78701
Place of Organization: Delaware
General Business Type: General partner of Mithril II LP
Relationship: Control of Mithril II LP as its general partner
Phone Number: No publicly available information identified

Mithril II UGP LLC

Address: 600 Congress Avenue, Suite 3100, Austin, TX 78701
Place of Organization: Delaware
General Business Type: General partner of Mithril II GP LP
Relationship: Control of Mithril II GP LP as its general partner
Phone Number: No publicly available information identified

Talleus Ltd.

Address: No publicly available information identified
Place of Organization: No publicly available information identified

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General Business Type: Member of Mithril GP LLC
Relationship: No publicly available information identified
Phone Number: No publicly available information identified

Talleus II Ltd.

Address: No publicly available information identified
Place of Organization: No publicly available information identified
General Business Type: Limited partner of Mithril II GP LP
Relationship: No publicly available information identified
Phone Number: No publicly available information identified

Ajay Gopal Royan

Business Address: 600 Congress Avenue, Suite 3100, Austin, TX 78701
Relationship: Control of Mithril LP as managing member of Mithril GP LLC, and control of Mithril II LP as manager of Mithril II GP LP
Phone Number: 512-717-3770

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.