

Lance J.M. Steinhart, P.C.

Attorneys At Law
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005

Also Admitted in New York
Email: lsteinhart@telecomcounsel.com

Telephone: (770) 232-9200
Facsimile: (770) 232-9208

February 21, 2023

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Attn: International Bureau

Re: Application for Approval of a Transfer Control of Square Mobile, Inc.

Dear Ms. Dortch,

Attached please find for filing an Application for Square Mobile, Inc. ("Square"), pursuant to Section 214 of the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. § 214, and Sections 63.18 and 63.24 of the Commission's rules, 47 C.F.R. §§ 63.24, to transfer Control of Square Mobile, Inc. from Chung-Chi John Liu to Han Zhou.

This filing with the International Bureau and the applicable credit card payment in the amount of \$785.00, which satisfies the filing fee required under the Commission's rules, are being submitted electronically through the MyIBFS.

If you have any questions concerning the enclosed, please do not hesitate to contact me.
Thank you.

Respectfully submitted,

s/ Lance Steinhart

Lance J.M. Steinhart, Esq.
Managing Attorney
Lance J.M. Steinhart, P.C.
Attorneys for Square Mobile, Inc.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of	)	
	)	
Square Mobile, Inc.	)	
<i>Licensee</i>	)	
	)	
Chung-Chih John Liu	)	
<i>Transferor</i>	)	
	)	
and	)	IB File No. _____
	)	
Han Zhou	)	
<i>Transferee</i>	)	
	)	
Application for Consent to Transfer Control	)	
of a Company Holding International Section	)	
214 Pursuant to the Communications	)	
Act of 1934, as Amended	)	

JOINT INTERNATIONAL APPLICATION

Pursuant to Section 214 of the Communications Act of 1934, as amended (the “Act”), 47 U.S.C. § 214, and Sections 63.18 and 63.24 of the Commission’s rules, 47 C.F.R. §§ 63.24, Square Mobile, Inc. (“Square” or the “Company”), Chung-Chih John Liu, and Han Zhou (collectively the “Applicants”), hereby respectfully request Federal Communication Commission (“FCC” or “Commission”) consent to transfer control of Square from Chung-Chih John Liu to Han Zhou.

Square holds international section 214 authority but does not provide any services or have active customers. Square has no foreign ownership and is not a foreign carrier and is not affiliated with foreign carriers in any market.

As discussed in more detail below, Chung-Chih John Liu and Haz Zhou have entered into an agreement pursuant to which Han Zhou will acquire one hundred percent (100%) of the stock for Square. The transaction will not result in any loss or impairment of service for any customers as Square is not providing services.

The Applicants provide below the information required by section 63.24(e)(2) of the Commission's rules, 47 C.F.R. § 63.24(e)(2). The Applicants seek streamlined treatment for this Application. Applicants request streamlined treatment for this Application pursuant to section 63.12(c) of the Commission's rules, because: (i) Applicants are not affiliated with a foreign carrier and will not become affiliated with any foreign carrier as a result of the proposed transaction; (ii) Applicants are not affiliated with any dominant U.S. carrier whose international switched or private line services Applicants seek authority to resell, nor will Applicants be so affiliated post-close; and (iii) none of the other scenarios outlined in section 63.12(c) of the Commission's rules, 47 C.F.R. § 63.12, apply.

I. DESCRIPTION OF THE APPLICANTS

A. Square Mobile, Inc.

Square (FRN: 0031675127) is a corporation organized under the laws of the State of Delaware. Its principal place of business is located at 8619 Warwick Shore Xing, Orlando, Florida 32829. Square holds international section 214 authority from the Commission.¹ The Company is not providing services at this time. Square has no interest-holders or subsidiaries that offer international telecommunications services. Square is not a foreign carrier, nor is it affiliated with foreign carriers in any market.

Square is wholly owned by Chung-Chih John Liu, a U.S. Citizen.

B. Chung-Chih John Liu

Chung-Chih John Liu, a U.S. Citizen, residing in the state of Florida currently owns one hundred percent (100%) of Square. Chung-Chih John Liu does not hold ten percent (10%) or greater interest in any other provider of domestic or international telecommunications services.

C. Han Zhou

Han Zhou, a U.S. Citizen residing in the state of New York, does not hold ten percent (10%) or greater interest in any other provider of domestic or international telecommunications services.

II. DESCRIPTION OF THE TRANSACTION

Pursuant to the executed stock purchase agreement, Han Zhou will acquire one hundred percent (100%) of Square's stock from Chung-Chih John Liu. Square will be wholly owned by Han Zhou.

III. PUBLIC INTEREST STATEMENT

Square does not currently provide service or have customers, pursuant to Section 214 of the Communications Act of 1934 if the Commission finds that the public interest, convenience

¹ File No. ITC-214-20211220-00200 (granting authority to provide global or limited global facilities-based and resold international services in on January 13, 2022).

and necessity will be served thereby. 47 U.S.C. § 214.

A. Public Interest Benefits of the Transaction

The Transaction will demonstrably serve the public interest by bringing the managerial, technical, and financial resources available through the purchaser allowing it to operate fully as a telecommunications company.

B. The Transaction Will Have No Adverse Impact on Customers

There are no active customers.

C. The Transaction Poses No Competitive Risks for the International Telecommunications Market

Finally, the Transaction poses no risk of anticompetitive impact on the U.S. international telecommunications marketplace. Applicants have no share of the international telecommunications market, and are not foreign carriers or affiliated with a foreign carrier in any market. Therefore, the proposed Transaction will have no ability to adversely affect competition in the international telecommunications market.

IV. INFORMATION REQUIRED BY SECTION 63.24(e) OF THE COMMISSION'S RULES

The Applicants submit the following information pursuant to section 63.24(e) of the Commission's rules, including the information requested in section 63.18:

(a) Name, address and telephone number of the Applicants:

Square Mobile, Inc.
8619 Warwick Shore Xing
Orlando Florida 32829

Chung-Chih John Liu
8619 Warwick Shore Xing
Orlando Florida 32829

Han Zhou
499S Spalding Dr.
Beverly Hills, CA 90212

(b) Square Mobile, Inc. is a Delaware corporation. Chung-Chih John Liu and Han Zhou are both U.S. Citizens.

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

Lance J.M. Steinhart
Managing Attorney
Lance J.M. Steinhart, P.C.
Attorneys at Law
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Alpharetta, Georgia 30005
(770) 232-9200 (Phone)
(770) 232-9208 (Fax)
lsteinhart@telecomcounsel.com (E-Mail)

(d) Square holds international section 214 authority, granted in FCC File No. ITC-214-20211220-00200 to operate as a global or limited global facilities-based and resale carrier.

(h) Pre-close, the following individuals or entities hold a ten percent (10%) or greater interest in Square:

Name: Chung-Chih John Liu
United States Citizen
Business Address:
8619 Warwick Shore Xing
Orlando Florida 32829
Percent Ownership Interest in Square: 100%

Post-close, the following individuals or entities will hold a ten percent (10%) or greater interest in Square:

Name: Han Zhou
United States Citizen
Business Address: 499S Spalding Dr., Beverly Hills, CA 90212
Percent Ownership Interest in Square: 100%

There will be no interlocking directorates with any foreign carrier following consummation of the proposed Transaction.

(i) As confirmed by the signature of Applicants' representatives to this Application, Applicants certify that (a) Applicants are not foreign carriers and are not affiliated with a foreign carrier, and (b) Applicants will not become a foreign carrier or become affiliated with a foreign carrier post-close.

(j) As confirmed by the signature of Applicants' representatives to this Application, Applicants certify that the Applicants do not seek to provide international telecommunications services to any destination country where (i) the Applicant is a foreign carrier; (ii) the Applicant controls a foreign carrier; (iii) any entity that owns

more than 25 percent of Applicants, or that controls Applicants, controls a foreign carrier; or (iv) two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of Applicants and are parties to, or the beneficiaries of, a contractual relation affecting the provision or marketing of international basic telecommunications services in the United States.

- (k) Not applicable
- (l) [Reserved]
- (m) Not applicable.
- (n) As confirmed by the signatures of Applicants' representatives to this Application, Applicants certify that they have not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route, and they will not enter into such agreements in the future.
- (o) As confirmed by the signatures of Applicants' representatives to this Application, Applicants certify that, pursuant to sections 1.2001 through 1.2003 of the Commission's rules, they are not subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.
- (p) Applicants request streamlined processing of this Application pursuant to section 63.12 of the Commission's rules, 47 C.F.R. § 63.12. This Application qualifies for streamlined treatment under section 63.12(c) of the Commission's rules because: (i) Applicants are not affiliated with a foreign carrier and will not become affiliated with any foreign carrier as a result of the proposed transaction; (ii) Applicants are not affiliated with any dominant U.S. carrier whose international switched or private line services Applicants seek authority to resell, nor will Applicants be so affiliated post-close; and (iii) none of the other scenarios outlined in section 63.12(c) of the Commission's rules, 47 C.F.R. § 63.12, apply.

VI. ADDITIONAL CERTIFICATIONS BY APPLICANTS

As confirmed by the signature of Applicants' representatives to this Application, Applicants certify that Applicants: (i) will comply with CALEA and related Commission rules and orders to the extent applicable; (ii) make communications to, from, or within the United States, as well as records thereof, available to U.S. law enforcement officials; (iii) designate a U.S. citizen or permanent U.S. resident as a point of contact for the execution of lawful requests and as an agent for legal service of process; (iv) affirm that all information submitted to the Commission as part of the application process is complete and accurate, and will promptly inform the Commission and the Executive Branch agencies of any (a) substantial and significant changes in such information, while an application is pending, as defined in section 1.65 of the Commission's rules, and (b) applicant or contact information changes after the application is no longer pending promptly and in any event within thirty (30) days; and (v) affirm their understanding that failure to fulfill any of the conditions of the grant of their applications can result in license revocation or termination and criminal and civil penalties.

V. CONCLUSION

Based on the foregoing, the Applicants respectfully submit that the public interest, convenience, and necessity would be served by grant of this Application.

Respectfully submitted,

/s/ Lance J.M. Steinhart

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Managing Attorney
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Alpharetta, Georgia 30005
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Attorneys for Square Mobile, Inc.

Dated: February 21, 2023

Pre and Post Transaction Organizational Charts

Pre Transaction



Post Transaction

