ATTACHMENT 1

Notification of *Pro Forma* Transfer of Control of International Section 214 Authorization

Pursuant to Section 214 of the Communications Act of 1934, as amended, and Section 64.24(f) of the Commission's rules,[1] the Commission is hereby notified of an internal reorganization that resulted in the *pro forma* transfer of control of NAL Research Corp. ("NAL Research") and its international Section 214 authorization. The internal reorganization, which occurred on November 6, 2025, did not result in a change in the ultimate control of NAL Research or its international Section 214 authorization.

Additional information responsive to FCC Form 214-TC regarding the *pro forma* transfer of control of NAL Research is set forth below.

Response to Items 19 and 25

Pursuant to Section 63.18(h) of the Commission's rules, the following entities currently directly or indirectly hold a ten percent or greater voting or equity interest in, or controls, NAL Research following the internal reorganization.

Name:	**AspenPoint Inc.**
Address:	11100 Endeavor Court, Suite 300 Manassas, VA 20109
Citizenship:	United States
Principal Business:	Holding company
Ownership interest:	100% voting and equity interest in NAL Research Corp.

Name:	**AspenPoint Group LLC**
Address:	11100 Endeavor Court, Suite 300 Manassas, VA 20109
Citizenship:	United States
Principal Business:	Holding company
Ownership interest:	100% voting and equity interest in ApsenPoint Inc.

Name:	**Horizon Bidco, LLC** (the "Transferee")
Address:	399 Park Avenue, 30th Floor New York, NY 10022
Citizenship:	United States
Principal Business:	Holding company
Ownership interest:	100% voting and equity interest in ApsenPoint Group LLC

[1] 47 U.S.C. § 214; 47 C.F.R. § 64.24(f).

Name:	**Horizon Midco, LLC**
Address:	399 Park Avenue, 30th Floor New York, NY 10022
Citizenship:	United States
Principal Business:	Holding company
Ownership interest:	100% voting and equity interest in Horizon BidCo, LLC

Name:	**Horizon CAS Group Holdings, LP**
Address:	399 Park Avenue, 30th Floor New York, NY 10022
Citizenship:	United States
Principal Business:	Holding company
Ownership interest:	100% voting and equity interest in Horizon Midco, LLC

Name:	**The Resolute Fund VI, L.P.**
Address:	399 Park Avenue, 30th Floor New York, NY 10022
Citizenship:	United States
Principal Business:	Investment company
Ownership interest:	83.1% voting and equity interest in Horizon CAS Group Holdings, LP

Name:	**Resolute Fund Partners VI, L.P.**
Address:	399 Park Avenue, 30th Floor New York, NY 10022
Citizenship:	United States
Principal Business:	Investment company
Ownership interest:	100% voting interest (0% equity interest) in The Resolute Fund VI, L.P.

Name:	**Resolute Fund Partners VI GP, LLC**
Address:	399 Park Avenue, 30th Floor New York, NY 10022
Citizenship:	United States
Principal Business:	Investment company
Ownership interest:	100% voting interest (0% equity interest) in Resolute Fund Partners VI, L.P.

Name:	**TJC Partners LLC**[2]
Address:	399 Park Avenue, 30th Floor New York, NY 10022
Citizenship:	United States
Principal Business:	Investment company
Ownership interest:	100% voting and equity interest in Resolute Fund Partners VI GP, LLC

No other individual or entity holds a 10 percent or greater direct or indirect voting or equity interest in, or controls, NAL Research.

Response to Items 21 and 32

The information and certifications required by 47 CFR § 63.18(i) through (m) are as follows:

(i) Neither NAL Research nor the Transferee is a foreign carrier, nor are they affiliated with a foreign carrier.

(j) Neither NAL Research nor the Transferee seeks to provide international telecommunications services to any destination country in which: (1) it is a foreign carrier in that country; (2) it controls a foreign carrier in that country; (3) any entity that owns more than 25% of the company, or that controls the company, controls a foreign carrier in that country; or (4) two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25% of the company and are parties to, or the beneficiaries of, a contractual relation (e.g., a joint venture or market alliance) affecting the provision or marketing of international basic telecommunications services in the United States.

(k) Not applicable.

(l) Not applicable.

(m) Not applicable.

Response to Items 16, 24, and 28

An internal reorganization was undertaken on November 6, 2025 that resulted in the *pro forma* transfer of control of NAL Research and its international Section 214 authorization. Specifically, through a series of steps, ownership of AspenPoint Group LLC – of which NAL Research is an indirect wholly-owned subsidiary – was transferred from one portfolio company controlled by TJC Partners LLC ("TJC Partners") to another portfolio company controlled by TJC Partners.

[2] Albert Richard Caputo, Jr. holds approximately 26% of the voting and equity interests of TJC Partners LLC. Mr. Caputo is a U.S. citizen. His business address is 399 Park Avenue, 30th Floor, New York, NY 10022.

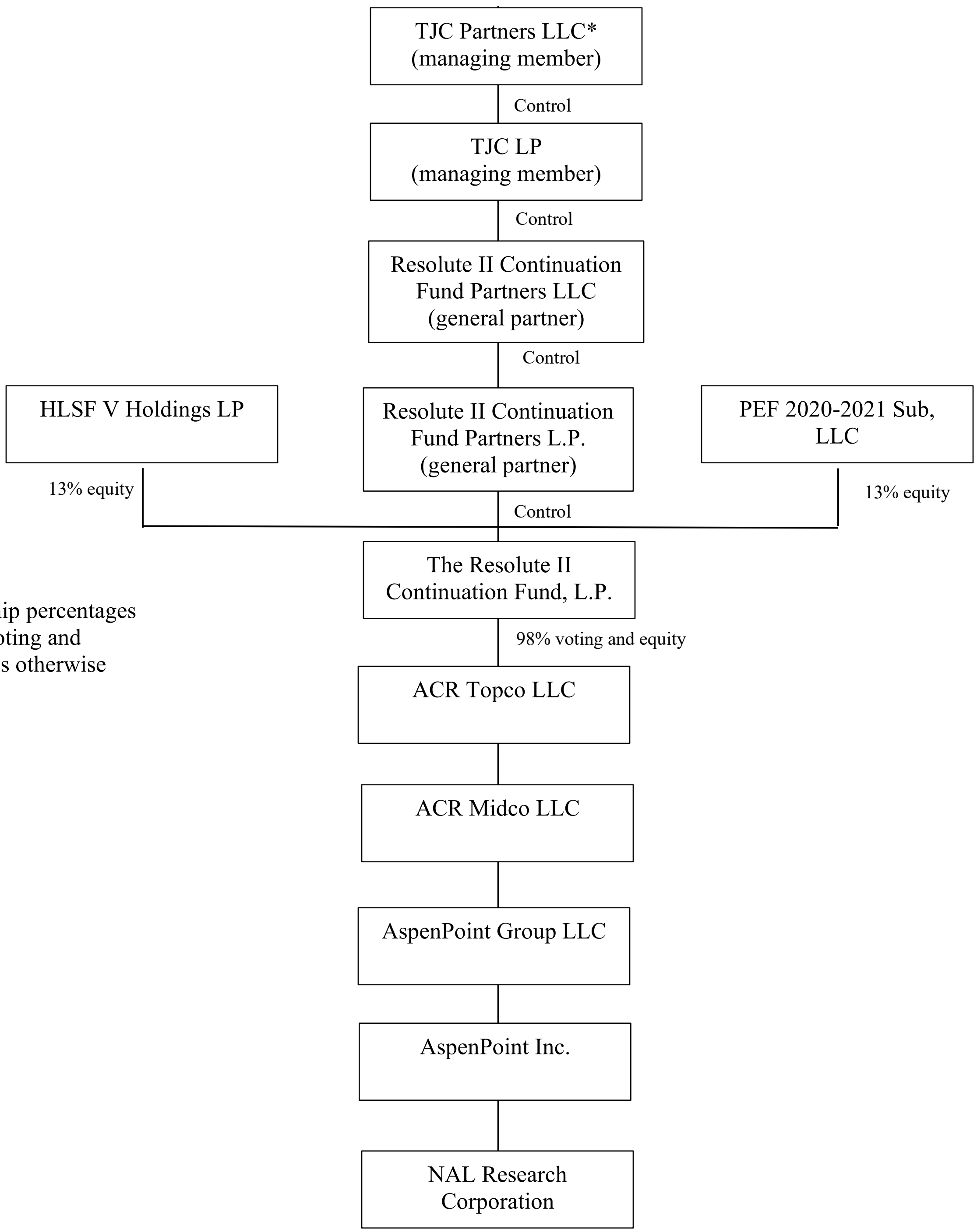
Exhibit 1 includes charts depicting NAL Research's ownership prior to and after the internal restructuring. As NAL Research remains under the control of TJC Partners, the internal restructuring was *pro forma* in nature.[3] Moreover, together with all previous *pro forma* transactions, the internal restructuring does not result in a change in NAL Research's ultimate control. The transaction also is in the public interest as it facilitates the continued support and investment in NAL Research and its provision of services, and it will not result in any public interest harms.[4]

---

[3] *Communications Bar Ass'ns Petition for Forbearance from Section 310(d) of the Communications Act*, Memorandum Opinion and Order, 13 FCC Rcd 6293 ¶ 42 (1998) (concluding that a "corporate reorganization which involves no substantial change in the beneficial ownership of the corporation" is *pro forma* in nature).

[4] *See 1998 Biennial Review – Review of International Common Carrier Regulations*, Report and Order, 14 FCC Rcd 4909 ¶ 42 (1999) (finding that "[r]egulatory review of [*pro forma*] transactions yields no significant public interest benefits, but may delay or hinder transactions that could provide substantial financial, operational, or administrative benefits for carriers").

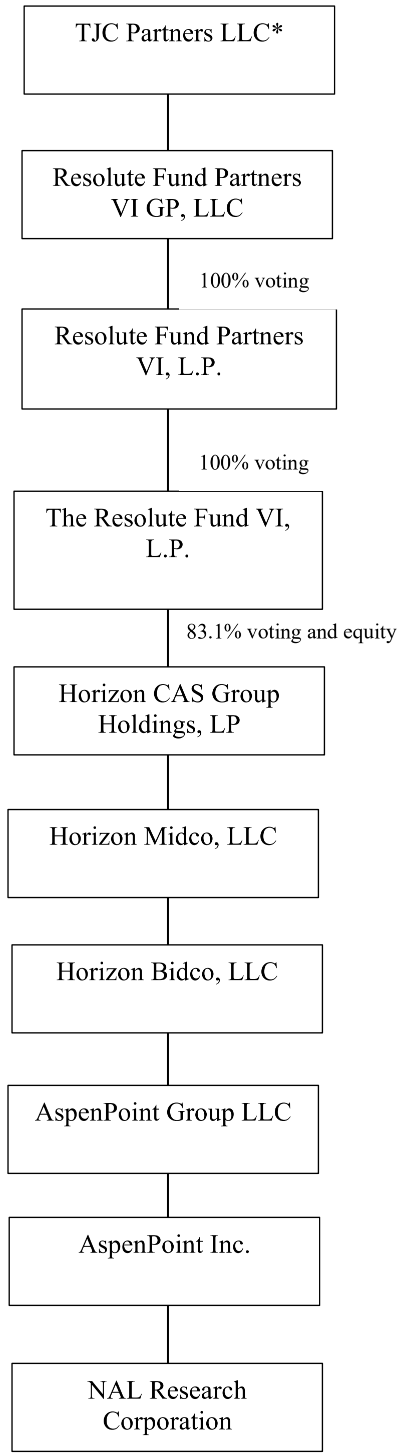
Exhibit 1: Pre-Closing Ownership



All ownership percentages are 100% voting and equity unless otherwise indicated.

* Albert Richard Caputo, Jr. holds approximately 26% of the voting and equity interests of TJC Partners LLC.

Exhibit 1: Post-Closing Ownership



All ownership percentages are 100% voting and equity unless otherwise indicated.

* Albert Richard Caputo, Jr. holds approximately 26% of the voting and equity interests of TJC Partners LLC.