

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

In the Matter of)
)
Lycamobile USA, Inc.)
(Licensee))
)
And) **File No.: ITC-214-20110517-00137**
Company Shareholder, Allirajah Subaskaran)
(“Transferor”)) **FRN: 0020863254**
FRN: 0030966766)
)
And)
Salinasco Holdings Ltd. (a Cypriot Limited Co.))
FRN: 0030967020)
)
And)
Samra Trust (a Jersey Trust))
For Beneficiary Wife and Children of)
Mr. Allirajah Subaskaran)
FRN: 0030967236)
)
And)
Shanxi Ltd. (trustee of Samra Trust))
FRN: 0030967293)
)
(Transferees and Beneficial Transferees))
)
Application for *Pro Forma* Transfer Control of)
International facilities-based and resale)
Authority Pursuant to Section 214 of the)
Communications Act of 1934, as amended.)
_____)

**APPLICATION FOR PRO FORMA TRANSFER OF CONTROL
OF INTERNATIONAL AUTHORITY OF
LYCAMOBILE USA, INC.**



By and through its Attorney:
Edward A. Maldonado, Esq.
The Law Offices of Edward A. Maldonado, P.A.
2850 Douglas Road, Suite 303, Coral Gables, FL 33134
Tel: 305-477-7580 Fax: 305-477-7504 Direct Line 786-292-0459
E-mail: eam@maldonado-group.com www.maldonado-group.com

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Application

Mr. Allirajah Subaskaran (“**Subaskaran**” or “**Transferor**”), sole stockholder of Lycamobile USA, Inc. (“**Licensee**”), together with Salinasco Holdings Ltd., a Cypriot limited liability company (“**Salinasco**”) held one hundred percent (100%) by Samra Trust, a Jersey Trust (“**Samra**”) of which Shanxi Limited is the trustee (“**Shanxi Ltd.**”) and where **Subaskaran** acts as Protector under Jersey law for the benefit of Mrs. Prema Subaskaran and the children of Mr. Allirajah Subaskaran (collectively called “**Subaskaran Wife and Children**”) herein collectively called the "Applicants." The Pro Forma Transfer is a part of an overall restructuring of all of **Subaskaran’s** personal assets and holdings for the benefit of **Subaskaran Wife and Children.**

Applicants hereby give notice of and request record of a *pro forma* transfer of control of Lycamobile USA, Inc.'s the international authority pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. Section 214 *et. al.* (1982), and Section 63.18 of the Federal Communication Commission's (hereafter called "Commission") Rules, 47 C.F.R. Section 63.18, in order to provide global or limited international facilities-based and resale services between the United States and international points, under a new corporate holding structure. The corporate structuring necessary to ensure this took place over a period of months, with final documents among the various entities finalized on or before August 16, 2021. In support of this application, the Applicants state as follows:

I. **INTRODUCTION: Summary of the Contemplated Pro Forma Transfer**

The **Licensee** is a telecommunications carrier that provides international telecommunications services pursuant to authority by the Commission under **ITC-214-20110517-00137**. Lycamobile USA provides both international telecommunications services to the public, other carriers, as well as consumers. **Licensee** has operated since 2011 and all shares of the **Licensee** have been personally owned and held by **Subaskaran** since inception. **Subaskaran**, seeks to re-organize all his personal holdings in the telecommunications sector for the benefit of his wife and children under a trust and corporate equity structure wherein all stock of the **Licensee** is transferred to a holding company, **Salinasco Holdings Ltd.**, Cypriot limited company who shall control 100% of the Licensee's stock, and who is 100% controlled by a Jersey Trust, **Samra Trust**. The trustee of Samra Trust is Shanxi Limited: the Samra Trust is for the benefit of **Subaskaran Wife and Children**. **Subaskaran** therein is the Protector (a person with the ability to replace the Trustee retained for the Trust) of the **Samra Trust** for the benefit of **Subaskaran Wife and Children**. The transfer involves transfer of all stock in Licensee from **Subaskaran** to **Salinasco Holdings Ltd.** The structured holdings of **Salinasco Holdings Ltd** are already in place and both trust and holding company are ready to perform the terms of their formation. The holding of **Salinasco Holdings, Ltd.** in the **Licensee** are for the benefit of **Subaskaran Wife and Children**, again Protected by **Subaskaran** under Jersey law. **Subaskaran Wife and Children** are residents of the United Kingdom. The **Licensee** will be operated as before and there will be no changes to Directors or officers of the Licensee resulting from this Pro Forma Transfer. **Subaskaran** will

retain his position as President and Chairman of the **Licensee**. See “Post Pro Forma Transfer” structure diagram on page 27 of this Application. The transfer will not affect Licensee’s existing:

- 1.) Control structure wherein **Subaskaran** by and through the corporate trust structure may appoint more than 50 percent of the board of directors of the Licensee.
- 2.) **Subaskaran’s** indirect control to appoint, promote, demote, or fire senior executives and officers controlling the daily activities of the Licensee by and through the trust structure.
- 3.) **Subaskaran’s** existing ability to play an integral role in major management decisions of the Licensee by and through the trust structure.
- 4.) **Subaskaran’s** existing use of all of Licensees facilities and equipment.¹

While **Subaskaran**, as Protector of the Samra Trust, will maintain indirect but ultimate management and operational control of the **Licensee**, **Subaskaran’s** existing ability to receive distributions or profits from the **Licensee’s** facilities and operations will be divested from him in favor of **Subaskaran Wife and Children** through the holding structure. The trustee of Samra Trust, Shanxi Limited, shall be professionally managed by a third-party professional services company, Dominion (trading via Dominion Fiduciary Services Limited and its affiliates) and shall oversee Salinasco Holdings Limited, and the licensee for the benefit of Subaskaran and Wife and Children, but not undertake any control or management of the licensee or its operations. In this connection, the directors of Shanxi Limited are two Jersey companies called Dominion Fiduciary Directors (No.1) Limited and Dominion Fiduciary Directors (No.2) Limited.

Insofar as the transfer contemplated is *non-substantive* and *pro forma* in nature, the applicants desire streamlined treatment of this application. The result of this *pro forma* transfer will not affect the daily operations of the Licensee, discontinue or impair existing services, or affect any other continuing obligations to customers, other carriers or consumers of service.

¹ See 47 CFR §§ 63.04(d), 63.24(d).

Applicant **Subaskaran** presently holds one hundred percent (100%) of stock of the **Licensee**, a Delaware corporation. **Subaskaran** was previously approved by the Commission under the Licensee's original application under 47 U.S.C. §214 et. seq. **Subaskaran** is a citizen of the United Kingdom. **Transferee, Salinasco Holdings Ltd.**, is a limited liability company Cyprus held by **Samra Trust**, a Jersey Trust, for investment by a financial trust for benefit of **Subaskaran Wife and Children** and does not, and will not, provide international telecommunications services. **Samra Trust** is not affiliated with any foreign carrier in a destination market, nor does it have an affiliation with any dominant U.S. carrier who's international switched or private line services. **Samra Trust** exists solely as a financial trust for benefit of **Subaskaran Wife and Children**. Applicant **Subaskaran** is the Protector of **Samra** for continuity of know-how and management and has indirect control of the **Licensee** by and through the Trust Structure however all profits and monies attributable to Licensee shall be divested from **Subaskaran** to the Trust Structure (for the benefit of **Subaskaran Wife and Children**).

All documents have been filed to effectuate the above structure but are subject to approval of this Notice of *Pro Forma* transfer by the Commission to begin operation of the **Licensee** under the structure. This has been done for the protection and benefit of **Subaskaran Wife and Children**.

The **Licensee** serves customers throughout the United States. By granting this application, the Commission will serve the public interest, convenience and necessity by promoting competition in the international services market as well as such services throughout the United States. Competition will continue to benefit U.S. consumers with this *pro forma* transfer by maintaining service options and lowering prices. Thus, the public interest will be served by the grant of this Application for *Pro Forma* Transfer of Control.

II. Request for Streamlined Processing as to Transferor and the Transferee

As related to Transferor **Subaskaran** and the Transferees **Salinasco Holdings Ltd.**, held by **Samra Trust** (of which **Shanxi Ltd** is the trustee), the Applicants respectfully submit that this Application is eligible for streamlined processing pursuant to the Commission's Rules, found at 47

C.F.R. § 63.12(a). **Subaskaran** shall continue to control the operations and management of the Licensee indirectly, in his capacity as Protector of the Trust structure, but shall divest himself of distribution of profits to the favor of the Trust Structure for the benefit of **Subaskaran Wife and Children**. This Application is eligible for streamlined processing pursuant to Section 63.03(b)(2)(i) because, immediately following the transactions: (1) No applicant or its affiliate(s), as defined in Section 3(1) of the Communications Act (hereafter called "Affiliates") combined shall hold a ten percent (10%) or more share of the interstate and/or interexchange market; and (2) the Applicants nor their Affiliates are, or will be, dominant with respect to any service before or after the transaction.²

In support of this Application, Applicants provide the following information:

II. Description of the Applicants

A. Lycamobile USA, Inc. ("Licensee")

The **Licensee**, Lycamobile USA, Inc., is a Delaware corporation operating from the State of New Jersey and provides global facilities based and resold international telecommunications services to the public pursuant to 47 U.S.C § 214 *et. al.* under Commission Authority **ITC-214-20110517-00137**. **Licensee** is a non-dominant carrier under 47 CFR Section 63.03(b)(2)(i).

B. Allirajah Subaskaran ("Transferor")

Allirajah Subaskaran ("**Subaskaran**") is natural person and resident of the United Kingdom with domiciled at 152 Burford wharf 3 CAM Road, London, United Kingdom, E15 255 (and maintains a business office at the Licensee's New Jersey headquarters) for purposes of this Application. **Subaskaran** originally holds one hundred percent (100%) of **Licensee's** outstanding equity and stock. **Subaskaran** currently serves as President of

² This Application satisfies the criteria for streamlined processing pursuant to Section 63.12(a) of the Commission's rules, because none of the provisions of Section 63.12(c) of the Commission's rules, that prevent streamlined treatment, apply to the proposed Transaction. No Applicant (Licensee, Brahmbhatt or Transferee) is affiliated with a foreign carrier in a destination market, nor do any have an affiliation with a dominant U.S. carrier whose international switched or private line services it seeks authority to resell. Pursuant to Section 63.12(a) of the Commission's rules, the Commission should deem this Application granted on the 15th day after the date of the public notice listing this Application as accepted for filing.

the **Licensee**, and this management position will not change post-Transaction. **Subaskaran** possesses a collective thirty (30) years of experience in the field of telecommunications. **Subaskaran** is not affiliated with any company holding a dominant position in any international market.

C. Salinasco Holdings Ltd. (“Transferee”)

The Transferee, Salinasco Holdings Ltd., is a Cyprus limited liability company with its offices domiciled at Karaisaki Street, P.C. 3032 Limassol, Cyprus (“Salinasco”). **Salinasco** is a company controlled and managed through a trust structure created by **Subaskaran** to organize investment in the business of telecommunication services for the benefit of **Subaskaran Wife and Children** under the Jersey Trust, Samra Trust (of which Shanxi Limited is the trustee) **Salinasco** therein holds 100% stock position in the **Licensee** and maintains Board of Director appointments with voting rights equal to its equity position in the **Licensee**. **Subaskaran** represents **Salinasco** on the Licensee’s Board of Directors under corporate organization of **Salinasco** and as directed by its 100% Member, **Samra Trust (a Jersey Trust)**.

D. Samra Trust (Beneficial owner of “Transferee”)

Samra Trust (“**Samra**”) is the holder of all membership units of **Salinasco**. **Samra** is a Jersey Trust with offices domiciled at Box 603, 3rd Floor Charter Place, 23-27 Seaton Place, St Helier, JE4 0WH, Jersey. **Samra** is dedicated to the benefit of **Subaskaran Wife and Children** by holding investment in businesses related to information technology and telecommunication services. With relation to **Licensee**, **Samra** holds a 100% membership interest in **Salinasco** which holds a 100% stock position in the **Licensee**. **Samra** appoints and controls all officer, representative and management appointments under its equity position in **Salinasco**.

E. Shanxi Ltd. (Trustee of Trust “Transferee”)

Shanxi Ltd. is the Trustee of **Samra**. **Shanxi Ltd** is a Jersey company with its offices domiciled at Box 603, 3rd Floor Charter Place, 23-27 Seaton Place, St Helier, JE4 0WH, Jersey. The purpose of **Shanxi Ltd.** is to act as a Trustee of **Samra** of which **Subaskaran** holds control to replace and reappoint under certain provisions of the **Samra** Trust and Jersey law.

III **Public Interest Considerations:**

No day-to-day operation and management of the Licensee will not change by the contemplated Pro Forma structure. Licensee will continue to provide competitive services to the Public as before. This will bring to the market will benefit the consumers of United States-international telecommunications services, and specifically those in the U.S. states and U.S. territories where Lycamobile USA, Inc. presently provides services. This includes competitive pricing of services and increased availability of a variety of innovative service options. Therefore, grant of this Application will further the public interest.

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Application Attachment I.
(Information pursuant to 47 CFR § 63.12)

The following information is submitted, as required by 47 CFR § 63.12 of the Commission’s Rules, in support of the Applicants’ request for *pro forma* transfer of Control of Lycamobile USA’ authorization:

In Response to Question 9 of the Application: The Applicants respectfully requests streamline processing pursuant to 47 CFR § 63.12 and certifies that:

1. It is not affiliated with a foreign carrier in a destination market it seeks authority to serve.
2. It has no affiliation with a dominant U.S. carrier who’s international switched or private line services the Applicants or the Licensee seeks authority to resell, either directly or indirectly through the resale of another reseller’s services.
3. It does not seek authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines.
4. The Commission has not informed any Applicants or Lycamobile USA in writing that this Application is not eligible for streamlined processing.

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Application Attachment II.
(Information pursuant to 47 CFR § 63.18)

The following information is submitted, as required by 47 CFR § 63.18 of the Commission’s Rules, in support of Applicant’s request for authorization:

47 CFR § 63.18(a): The names, addresses and telephone numbers of the Applicants are as follows:

Licensee:
Lycamobile USA, Inc. **FRN: 0020863254**
24 Commerce Street, Suite 100
Newark, New Jersey 07102
Tel: (973) 286-0771
Attn: Mr. Allirajah Subaskaran, President

Transferor and Protector of Samra Trust:
Allirajah Subaskaran (a natural person)
152 Burford wharf 3 CAM Road,
London, United Kingdom, E15 255
AND
24 Commerce Street, Suite 100
Newark, New Jersey 07102
Tel: (973) 286-0771

FRN: **0030966766**

Transferee:
Salinasco Holdings Ltd.
Karaisaki Street, P.C. 3032
Limassol, Cyprus
Attn: Mr. Allirajah Subaskaran as
Protector of Samra Trust

FRN: **0030967020**

Beneficial Transferee (Owner of Salinasco):
Samra Trust
PO Box 603, 3rd Floor Charter Place,
23-27 Seaton Place, St Helier,
JE4 0WH, Jersey
Attn: Mr. Allirajah Subaskaran as
Protector of Shanxi Ltd.

FRN: **0030967236**

Beneficial Transferee (Trustee of Samra):
Shanxi Ltd.
PO Box 603, 3rd Floor Charter Place, 2
3-27 Seaton Place, St Helier,
JE4 0WH, Jersey

FRN: **0030967293**

47 CFR § 63.18(b): Jurisdiction of Persons and Organizations

- (1) Licensee: **Lycamobile USA, Inc.** is a corporation incorporated under the laws of the **State of Delaware**.
- (2) Transferor: **Allirajah Subaskaran** is a natural person and Citizen of the United Kingdom. Transferor has previously been approved by the Commission to hold Licensee under **ITC-214-20110517-00137**.
- (3) Transferee: **Salinasco Holdings Ltd.** is a Limited Liability Company formed under the laws of Cyprus for purposes of holding under a Trust structure. Transferee is held wholly (100%) by **Samra Trust**, a trust formed under the laws of Jersey.
- (4) Transferee: **Samra Trust** is a Trust formed under the laws of Jersey, of which Shanxi Ltd is the trustee. Transferor is Protector of this Trust and is a Citizen of the United Kingdom.

(5) Transferee: **Shanxi Ltd.** is the trustees of Samra Trust.

48 CFR § 63.18(c): Correspondence concerning this application should be sent to:

For: **Lycamobile USA, Inc.**
24 Commerce Street, Suite 100
Newark, New Jersey 07102
Tel: (973) 286-0771
Attn: Mr. Allirajah Subaskaran, President

For: **Allirajah Subaskaran**
24 Commerce Street, Suite 100
Newark, New Jersey 07102 (USA)
Tel: (973) 286-0771 and
152 Burford Wharf 3 CAM road
London, UK E15 233 (UK)

For: **Salinasco Holdings Ltd.**
Karaisaki Street, P.C. 3032
Limassol, Cyprus
Attn: Mr. Allirajah Subaskaran as Protector of
the Samra Trust

For: **Samra Trust**
Box 603, 3rd Floor Charter Place,
23-27 Seaton Place, St Helier,
JE4 0WH, Jersey
Attn: Mr. Allirajah Subaskaran,
Protector of the Samra Trust

For: **Shanxi Ltd.**
Box 603, 3rd Floor Charter Place,
23-27 Seaton Place, St Helier,
JE4 0WH, Jersey
Attn: Mr. Allirajah Subaskaran,
Protector of Samra Trust

With Copy to **Edward A. Maldonado, Esq.**
Maldonado Law
2850 Douglas Road Suite 303
Coral Gables, FL 33134
Tel: 305-477-7580 Fax: 305-477-7504
E-mail: eam@maldonado-group.com
on behalf of Lycamobile USA, Subaskaran,
Salinasco Holdings Ltd., Samra Trust, &
Shanxi Ltd.

In Response to Question 14 and 15 of FCC 214 Application:

47 CFR § 63.18(d): Lycamobile USA, Inc. has previously received authority under Section 214 of the Act. Applicant **Subaskaran** is sole stockholder in the **Licensee**. He has been previously approved by the Commission as owner of the **Licensee**. **Salinasco Holdings Ltd.** has not received previous authority from the Commission under Section 214 of the Act. This company will provide no telecommunications services under the Act. **Samra Trust** has not received previous authority from the Commission under Section 214 of the Act. This trust will provide no telecommunications services under the Act. **Shanxi**

Ltd. has not received previous authority from the Commission under Section 214 of the Act. The trustee will provide no telecommunications services under the Act.

47 CFR § 63.18(e): Applicants request *pro forma* approval for global or limited facilities-based and resale services under Section 214 of the Act and pursuant to the terms and conditions of Section 63.18(e)(1) and (e)(2) of the Commission's Rules. Applicant is not applying for authority to acquire facilities or to provide services not covered by paragraphs (e)(1) through (e)(3) of Section 63.18. Applicant is not seeking authority under paragraph (e)(4) of Section 63.18.

47 CFR § 63.18(g): Applicants will use previously authorized facilities to provide the services requested by the Application. Applicants are excluded from environmental assessment pursuant to Section 1.1306 of the Commission's Rules, specifically 47 C.F.R. § 1.1306.

CFR § 63.18(h): Under the *pro forma* transfer between the Applicants the information regarding the 10% or greater direct or indirect owners of Lycamobile USA, Inc. are:

Name :	Salinasco Holdings Ltd.
Address:	Karaisaki Street, P.C. 3032 Limassol, Cyprus
Citizenship:	Cyprus Limited Liability Company
Principal Business:	Private Investment Company
Ownership:	100% of Licensee Lycamobile USA

Applicants with 10% or greater direct or indirect ownership in **Salinasco Holdings Ltd.** are:

Name :	Samra Trust
Address:	Box 603, 3rd Floor Charter Place, 23-27 Seaton Place, Helier, JE4 0WH, Jersey
Citizenship:	British Territory of Jersey (U.K.)
Principal Business:	Trust for the Benefit of Subaskaran, Wife and Children
Ownership:	100% of Salinasco Holdings Ltd.
Protector:	Allirajah Subaskaran (Transferor)

Applicants with 10% or greater direct or indirect control in **Samra Trust as Trustee is:**

Name :	Shanxi Ltd.
Address:	Box 603, 3rd Floor Charter Place, 23-27 Seaton Place, St Helier, JE4 0WH, Jersey
Citizenship:	British Territory of Jersey (U.K.)
Principal Business:	Trustee of Samra Trust
Ownership:	None. Trustee of Samra Trust for performance of Trust

47 CFR § 63.18(i): The **Applicants, Subaskaran, Salinasco Holdings Ltd., Samra Trust and Shanxi Ltd.**, respectively certify that they are not affiliated with any foreign facilities-based or U.S. based dominant carriers.

47 CFR § 63.18(j): The **Applicants, Subaskaran, Salinasco Holdings Ltd., Samra Trust and Shanxi Ltd.**, respectively certify that they do not seek to provide international telecommunication services to any destination country for which any of the following are true:

1. They are not a foreign carrier in that country; or
2. They do not control a foreign carrier in that country; or
3. Any entity that owns more than twenty-five percent (25%) of **Salinasco Holdings Ltd** or the **Licensee** or that will otherwise control the Licensee after transaction will control a foreign carrier in that country.

47 CFR § 63.18(k): Not Applicable.

47 CFR § 63.18(l): Not Applicable.

47 CFR § 63.18(m): Not Applicable.

47 CFR § 63.18(n): The **Applicants and Lycamobile USA, Inc.** certify that they have not agreed and will not agree in the future to accept any direct or indirect special concessions from a foreign carrier or administration with regards to traffic or revenue flows between the United States and any foreign countries the company is authorized to serve.

47 CFR § 63.18(o): The **Applicants** certify that no party to this application has been denied federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

47 CFR § 63.18(p): The **Applicants** respectively request Streamline Processing of this Application pursuant to Section 63.12 of the Commission's Rules under 47 C.F.R. § 63.12.

CONCLUSION

In conclusion of the foregoing Application and Attachments, the Applicants, by and through Allirajah Subaskaran, certify that all of the information in this application is accurate and correct. For these reasons, respectfully requests that the Commission grant this application.

Respectfully submitted,

By: /s/ Allirajah Subaskaran /s/

Name **Allirajah Subaskaran**

Title: President of Lycamobile USA, Inc. (a Delaware company)

By and through their attorney:



/s/ Edward A. Maldonado /s/

Edward A. Maldonado, Esq.

MALDONADO LAW GROUP

2850 Douglas Road, Suite 303 Coral Gables, FL 33134

Tel: 305-477-7580 Fax: 305-477-7504 Direct Line 786-292-0459

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Pro Forma Transfer Application

VERIFICATION

I, Allirajah Subaskaran, state that I am the President of Lycamobile USA, Inc.; that I am authorized to make this Verification on behalf of the Applicants; that the foregoing filing was prepared under my direction and supervision; and that the contents are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this August 16, 2021.

By: /s/ Allirajah Subaskaran /s/
Name **Mr. Allirajah Subaskaran**
Title: President of
Lycamobile USA, Inc. (a Delaware company)

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Mr. Allirajah Subaskaran)
FRN: 0030967236)
)
And)
Shanxi Ltd. (trustee of Samra Trust))
FRN: 0030967293)
)
(Transferees and Beneficial Transferees))
)
Application for *Pro Forma* Transfer Control of)
International facilities-based and resale)
Authority Pursuant to Section 214 of the)
Communications Act of 1934, as amended.)
)
_____)

CERTIFICATION OF APPLICANT – SALINASCO HOLDINGS LTD.

The undersigned hereby certifies, on behalf of Salinasco Holdings Ltd. with respect to the foregoing application for Section 214 Authority to provide international services that:

1. Salinasco Holdings Ltd. is not affiliated with any foreign carrier in any of the countries to which Licensee proposes to provide service in the foregoing application.
2. Salinasco Holdings Ltd. by and through Licensee will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.P.R. 63.21-.23
3. Salinasco Holdings Ltd. does not seek to provide international telecommunications service to any destination where: (1) Salinasco is a foreign caller in that country; (2) Salinasco controls a foreign carrier in that country; (3) any entity that owns more than a 25% interest in Salinasco, or directly or indirectly Salinasco controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% of Salinasco and are parties to, or the beneficiaries of, a

contractual relationship that affects that provision or marketing of international basic telecommunications services in the United States.

4. Salinasco Holdings Ltd. has not agreed, and will not agree, to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future.
5. Salinasco Holdings Ltd. is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
6. The contents of the Application are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this August 16, 2021.

By: /s/ Allirajah Subaskaran /s/

Name **Mr. Allirajah Subaskaran**

Title: Protector of Samra Trust owner of

Salinasco Holdings Ltd. (a Cypriot company)

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

In the Matter of)
)
Lycamobile USA, Inc.)
(Licensee))
)
And) **File No.: ITC-214-20110517-00137**
Company Shareholder, Allirajah Subaskaran)
(“Transferor”)) **FRN: 0020863254**
FRN: 0030966766)
)
And)
Salinasco Holdings Ltd. (a Cypriot Limited Co.))
FRN: 0030967020)
)
And)
Samra Trust (a Jersey Trust))
For Beneficiary Wife and Children of)
Mr. Allirajah Subaskaran)
FRN: 0030967236)
)
And)
Shanxi Ltd. (trustee of Samra Trust))
FRN: 0030967293)
)
(Transferees and Beneficial Transferees))
)
Application for *Pro Forma* Transfer Control of)
International facilities-based and resale)
Authority Pursuant to Section 214 of the)
Communications Act of 1934, as amended.)
)
_____)

CERTIFICATION OF APPLICANT – SAMRA TRUST

The undersigned hereby certifies, on behalf of Samra Trust with respect to the foregoing application for Section 214 Authority to provide international services that:

1. Samra Trust is not affiliated with any foreign carrier in any of the countries to which Licensee proposes to provide service in the foregoing application.
2. Samra Trust by and through Licensee will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.P.R. 63.21-.23
3. Samra Trust by and through Licensee does not seek to provide international telecommunications service to any destination where: (1) Samra Trust is a foreign caller in that country; (2) Samra Trust controls a foreign carrier in that country; (3) any entity that owns more than a 25% interest in Samra Trust, or controls Samra Trust, controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% of Samra Trust and are parties to, or the

beneficiaries of, a contractual relationship that affects that provision or marketing of international basic telecommunications services in the United States.

4. Samra Trust has 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 sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future.
5. Samra Trust is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
6. The contents of the Application are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this August 16, 2021.

By: /s/ Allirajah Subaskaran /s/

Name **Mr. Allirajah Subaskaran**

Title: Protector of **Samra Trust** (a Jersey Trust)

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

In the Matter of)
)
Lycamobile USA, Inc.)
(Licensee))
)
And) **File No.: ITC-214-20110517-00137**
Company Shareholder, Allirajah Subaskaran)
(“Transferor”)) **FRN: 0020863254**
FRN: 0030966766)
)
And)
Salinasco Holdings Ltd. (a Cypriot Limited Co.))
FRN: 0030967020)
)
And)
Samra Trust (a Jersey Trust))
For Beneficiary Wife and Children of)
Mr. Allirajah Subaskaran)
FRN: 0030967236)
)
And)
Shanxi Ltd. (trustee of Samra Trust))
FRN: 0030967293)
)
(Transferees and Beneficial Transferees))
)
Application for *Pro Forma* Transfer Control of)
International facilities-based and resale)
Authority Pursuant to Section 214 of the)
Communications Act of 1934, as amended.)
)
_____)

CERTIFICATION OF APPLICANT – SHANXI LTD.

The undersigned hereby certifies, on behalf of Shanxi Ltd. with respect to the foregoing application for Section 214 Authority to provide international services that:

1. Shanxi Ltd. is not affiliated with any foreign carrier in any of the countries to which Licensee proposes to provide service in the foregoing application.
2. Shanxi Ltd. by and through Licensee will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.P.R. 63.21-.23
3. Shanxi Ltd. by and through Licensee does not seek to provide international telecommunications service to any destination where: (1) Shanxi Ltd. is a foreign caller in that country; (2) Shanxi Ltd. controls a foreign carrier in that country; (3) any entity that owns more than a 25% interest in Shanxi Ltd., or controls Shanxi Ltd., controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% of Shanxi Ltd. and are parties to, or the

beneficiaries of, a contractual relationship that affects that provision or marketing of international basic telecommunications services in the United States.

4. Shanxi Ltd has 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 sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future.
5. Shanxi Ltd is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
6. The contents of the Application are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this August 16, 2021.

By: /s/ Joanne Manser /s/
**For and on behalf of Dominion Fiduciary Directors (No.1) Limited
as director of Shanxi Limited**

/s/ Helen Morrison /s/
**For and on behalf of Dominion Fiduciary Directors (No.2) Limited
as director of Shanxi Limited**

Before the

FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Lycamobile USA, Inc.)
(Licensee))
)
And)
Company Shareholder, Allirajah Subaskaran)
("Transferor"))
FRN: 0030966766)
)
And)
Salinasco Holdings Ltd. (a Cypriot Limited Co.))
FRN: 0030967020)
)
And)
Samra Trust (a Jersey Trust))
For Beneficiary Wife and Children of)
Mr. Allirajah Subaskaran)
FRN: 0030967236)
)
And)
Shanxi Ltd. (trustee of Samra Trust))
FRN: 0030967293)
)
(Transferees and Beneficial Transferees))
)
Application for Pro Forma Transfer Control of)
International facilities-based and resale)
Authority Pursuant to Section 214 of the)
Communications Act of 1934, as amended.)
)
_____)

File No.: ITC-214-20110517-00137
FRN: 0020863254

CERTIFICATION OF APPLICANT - LICENSEE

The undersigned hereby certifies, on behalf of Lycamobile USA, Inc., Inc. with respect to the foregoing application for Section 214 Authority to provide international services that:

1. Lycamobile USA, Inc. is not affiliated with any foreign carrier in any of the countries to which Lycamobile USA, Inc. proposes to provide service in the foregoing application.
2. Lycamobile USA, Inc. will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.P.R. 63.21-.23
3. Lycamobile USA, Inc. does not seek to provide international telecommunications service to any destination where: (1) Lycamobile USA, Inc. is a foreign caller in that country; (2) Lycamobile USA, Inc. controls a foreign carrier in that country; (3) any entity that owns more than a 25% interest in Lycamobile USA, Inc., or controls Lycamobile USA, Inc, controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% of Lycamobile USA, Inc. and are parties to, or the beneficiaries of, a contractual relationship that affects that provision or marketing of international basic telecommunications services in the United States.

4. Lycamobile USA, Inc. has 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 sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future.
5. Lycamobile USA, Inc. is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
6. The contents of the Application are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this May 26, 2021.

By: /s/ Allirajah Subaskaran /s/

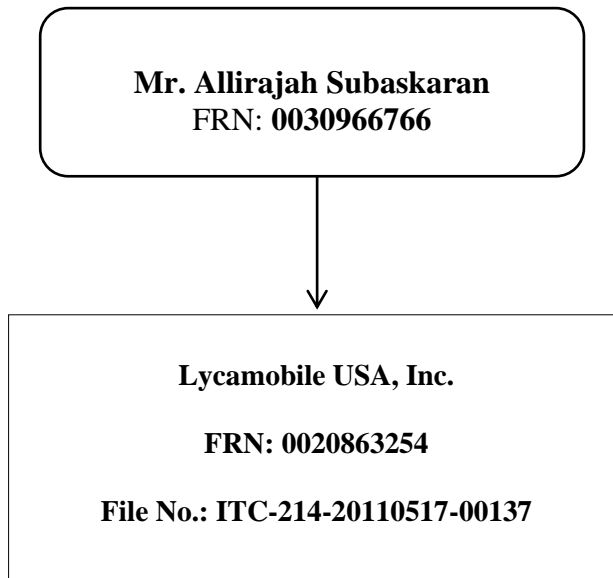
Name **Mr. Allirajah Subaskaran**

Title: President

Lycamobile USA, Inc. (a Delaware company)

DIAGRAM OF PRE-TRANSFER/POST TRANSFER OWNERHSIP

PRE-PROFORMA TRANSFER



Post-Pro Forma Transfer Control

