

AMENDED ATTACHMENT 1

Pursuant to the applicable requirements for Recognized Operating Agency Authority as set forth in 47 C.F.R. §63.701 and the instant application for Recognized Operating Agency, Limitless Mobile, LLC. (“Applicant”) hereby provides the following supplemental information:

47 C.F.R. §63.701. Certification and acknowledgement.

Limitless Mobile, LLC is aware that it is obligated under Article 6 of the ITU Constitution to obey the mandatory provisions thereof, and all regulations promulgated thereunder, and pledges that it will engage in no conduct or operations that contravene such mandatory provisions and that it will otherwise obey the Convention and regulations in all respects. Limitless Mobile, LLC is aware that failure to comply will result in an order from the Federal Communications Commission to cease and desist from future violations of an ITU regulation and may result in revocation of its recognized operating agency status by the United States Department of State.

47 C.F.R. §63.701(d). “A statement of the ownership of a non-corporate applicant or the ownership of the stock of a corporate applicant, including whether the applicant or its stock is owned directly or indirectly by an alien.”

Applicant is a limited liability company organized under the laws of Delaware with its principal offices located at 2574 Interstate Drive, Harrisburg, Pennsylvania 17110. The sole member in Applicant is Tower Bridge Mobile Holdings, LLC (“TBMH”) which is also a limited liability company organized under the laws of Delaware. The following entities hold membership interests of 10% or more in TBMH:

Richard B. Worley 29.73%

Sarah Miller Coulson 29.73%

Roberto Sella 29.73%

All membership interests in TBMH are held by U.S. citizens.¹

Additionally, as noted in response to question 13 of the attached application form, the foregoing members of TBMH also hold indirect ownership interests of greater than 25% in three foreign carriers: Limitless Mobile AB (Sweden); Limitless Mobile SP Z.O.O. (Poland); and Limitless Mobile ApS (Denmark) through their continued ownership of membership interests in the Applicant’s pre-reorganization parent company, LMH. These foreign affiliation interests have been previously disclosed to the Commission.

¹ TBMH is the successor to Limitless Mobile Holdings, LLC (“LMH”) as the parent company of the Applicant under a plan of reorganization of the Applicant approved on November 28, 2017 by the United States Bankruptcy Court for the District of Delaware. Although LMH no longer owns any interest in the Applicant, it continues to hold a controlling interest in certain foreign affiliates of the Applicant, through its wholly-owned U.S. subsidiaries, Limitless Mobile Holdings, Inc. and Limitless Europe, Inc. The affiliation arises from the three disclosable interest holders in TBMH, the Applicant’s parent company, who continue to hold membership interests in LMH.

See IBFS File No. FCN-NEW-20140815-00012.² As noted in that filing, none of these carriers is dominant in the countries in which they operate and all three operate as non-facilities based resellers.

47 C.F.R. §63.701(f). “A statement whether the applicant is a carrier subject to Section 214 of the Communications Act, an operator of broadcast or other radio facilities, licensed under Title III of the Act, capable of causing harmful interference with the radio transmissions of other countries, or a non-carrier provider of services classed as ‘enhanced’ under Section 64.702(a).”

Applicant is a carrier subject to Section 214 of the Act and holds a Section 214 authorization to provide Global Resale services. See IBFS File No. ITC-214-20100525-00214. Applicant also holds two broadband PCS licenses and approximately a dozen related microwave licenses over which the Applicant provides domestic mobile voice and data services to customers in its licensed territory. None of these licenses or operations will cause harmful interference with the radio transmissions of other countries.

47 C.F.R. §63.701(g). “A statement that the services for which designated as a recognized private operating agency is sought will be extended to a point outside the United States or are capable of causing harmful interference to other radio transmissions and a statement of the nature of the services to be provided.”

The services, as described in the response to the 47 C.F.R. §63.701(h) inquiry, will extend to points outside the United States. The services are not capable of causing harmful interference to radio transmissions.

47 C.F.R. §63.701(h). “A statement setting forth the points between which the services are to be provided.”

Applicant provides M2M and IOT services to Applicant’s customers in worldwide destinations.

47 C.F.R. §63.701(i). “A statement as to whether covered services are provided by facilities owned by the applicant, by facilities leased by another entity, or other arrangement and a description of the arrangement.”

Applicant’s covered services provided over facilities that are resold or leased from other providers except as to Internet communications. Applicant’s data center location and switching facilities located in Harrisburg, PA are owned by Applicant.

² The overseas operating companies have now been rebranded as ‘Telenabler’ and operate under the following names: Telenabler ApS (Denmark), Telenabler AB (Sweden) and Telenabler S.p.z.o.o (Poland). In addition to these three foreign affiliates, the earlier Foreign Carrier Notification disclosed a planned affiliation with IP Solutions International, Ltd. in the Bahamas, which did not materialize as the transaction was never consummated, as well as foreign affiliations with Limited Mobile GmbH in Germany and Limited Mobile Limited in the United Kingdom.. These latter two companies are now inactive and are in the process of being liquidated.