

RESPONSE TO QUESTIONS 30-33: Alien Ownership

In response to Questions 30 and 31 of Form 312, Star One S.A. (“Star One”) was a corporation organized under the laws of Brazil. As discussed in prior filings with the Commission, Star One was merged into Claro S.A. (“Claro”) through a *pro forma* transaction.¹ Subsequently, Claro transferred three satellites on the Commission’s Permitted Space Station List—Star One C1,² Star One C2,³ and Star One C3⁴—to Embratel Tvsat Telecomunicações S.A. (“Embratel”) through a *pro forma* transaction.⁵ Claro and Embratel are corporations organized under the laws of Brazil.

In response to Questions 32 and 33, both Claro and Embratel are 100% owned and ultimately controlled by América Móvil, S.A.B. de C.V. (“América Móvil”), a corporation organized under the laws of Mexico. Claro is directly controlled by Claro Telecom Participações S.A. (“Claro Telecom”), a corporation organized under the laws of Brazil, which holds 83.25% of Claro’s voting shares. The vast majority of Claro’s remaining voting shares—13.71%—are held by Controladora de Servicios de Telecomunicaciones, S.A. de C.V. (“Controladora de Servicios”), a corporation organized under the laws of Mexico. Claro Telecom is controlled by Sercotel, S.A. de C.V. (“Sercotel”), a corporation organized under the laws of Mexico, which owns over 99.99% of Claro Telecom. Sercotel is 100% directly owned and controlled by América Móvil. Controladora de Servicios is also 100% directly owned and controlled by América Móvil.

Embratel is directly controlled by Claro NXT Telecomunicações LTDA (“Claro NXT”), a limited liability company organized under the laws of Brazil, which directly holds 67.1% of Embratel’s voting shares. The other 32.9% of Embratel’s voting shares are held by Telmex do Brasil S.A., a corporation organized under the laws of Brazil, which itself is 100% owned and controlled by Claro NXT. Claro NXT is controlled by Claro, which owns 90.76% of Claro NXT’s shares. As stated above, Claro is directly controlled by Claro Telecom, and is 100% owned and ultimately controlled by América Móvil.

¹ See Letter from Alfred M. Mamlet, Counsel, Star One S.A., to Marlene H. Dortch, Secretary, FCC, IBFS File Nos. SAT-PPL-20050706-00143, SAT-PPL-20050708-00144, SAT-LOI-20110914-00180 (filed Sep. 19, 2018).

² *Stamp Grant*, File No. SAT-PPL-20050706-00143, Call Sign S2677 (granted Mar. 29, 2006).

³ *Stamp Grant*, File No. SAT-PPL-20050708-00144, Call Sign S2678 (granted Sept. 9, 2005).

⁴ *Stamp Grant*, File No. SAT-LOI-20110914-00180, Call Sign S2845 (granted June 29, 2012).

⁵ See Letter from Alfred M. Mamlet, Counsel, Star One S.A., to Marlene H. Dortch, Secretary, FCC, IBFS File Nos. SAT-PPL-20050706-00143, SAT-PPL-20050708-00144, SAT-LOI-20110914-00180 (filed Oct. 1, 2020).