

RESPONSE TO QUESTIONS 30-33: Alien Ownership

In response to Questions 30 and 31 of Form 312, Embratel TVSAT Telecomunicações S.A. (“Embratel”) is a corporation organized under the laws of Brazil. As discussed in prior filings with the Commission, Star One S.A.—which filed the market access petition for the Star One C2 satellite—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, including Star One C2, to Embratel through a *pro forma* transaction.²

In response to Questions 32 and 33, Embratel is 100% owned and ultimately controlled by América Móvil, S.A.B. de C.V. (“América Móvil”), a corporation organized under the laws of Mexico. Embratel is directly controlled by Claro NXT Telecomunicações LTDA (“Claro NXT”), a limited liability company organized under the laws of Brazil, which directly holds 80.12% of Embratel’s voting shares. The other 19.88% 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.

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 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); Star One S.A., File No. SAT-MPL-20210302-00027, Call Sign S2678 (granted July 16, 2021).