Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
RTI Solutions, Inc. d/b/a HMB Solutions BOC-LA1 LLC, and Forager Holdings Corp.	)	SCL-T/C-20230928-00027
	)	
Application to Transfer Control Over a Cable Landing License	)	
	)	

RESTATED AND AMENDED APPLICATION FOR STREAMLINED CONSENT TO TRANSFER CONTROL

Pursuant to the Act Relating to the Landing and Operation of Submarine Cables in the United States,[1] Executive Order No. 10530,[2] and the Commission's rules,[3] RTI Solutions, Inc. d/b/a HMB Solutions ("HMB Solutions" or "Licensee"), BOC-LA1 LLC ("BOC"), and Forager Holdings Corp. ("Forager") (collectively "Applicants") request Commission consent to the transfer of indirect control over the Cable Landing License for the JGA North submarine cable system (File No. SCL-LIC-20181106-00035) held by certain shareholders in HMB Solutions to BOC, which in turn will be owned and controlled by Forager.

The transactions serve the public interest and will not result in any loss or impairment of service for any JGA North submarine cable system customer and will have no adverse effects on competition in Guam, the rest of the United States, or abroad. Indeed, the existing HMB Solutions management remains in place, and it is anticipated that they will continue to operate

[1] 47 U.S.C. §§ 34-39 (1994).

[2] Exec. Ord. No. 10530 reprinted as amended in 3 U.S.C. § 301 (2016).

[3] 47 C.F.R. § 1.767

the company once the transfer of indirect control is approved by the Commission. These transactions also serve the public interest by allowing HMB Solutions to potentially enjoy access to the financial resources and management expertise of BOC, Forager, and their affiliates, which will ultimately benefit HMB Solutions' customers as well as customers of the JGA North submarine cable system.

The Applicants respectfully request streamlined treatment for this application, pursuant to Section 1.767(k)(2) of the Commission's rules.[4] A prompt and expeditious grant of this application will significantly advance the public interest.[5]

I. Description of the Applicants

A. RTI Solutions, Inc. d/b/a HMB Solutions ("HMB Solutions") – Licensee

HMB Solutions is a California corporation, serves as the U.S. landing party for the JGA North submarine cable system and controls the Piti, Guam cable landing station under a contract with cable landing station owner, Gateway Network Connections, LLC ("GNC").

Prior to the separate transactions discussed below, HMB Solutions had the following 10-percent-or-greater direct or indirect voting or equity interest holders: (1) Mr. Brian Mass, a U.S. citizen (14.5% voting and equity interest); (2) Mr. Christopher Brungardt, a U.S. citizen (10.0% voting and equity interest); (3) Making Chaos Global, LLC, a Nevada limited liability company (16.7% voting and equity interest)[6]; and (4) LSF Capital Pte. Ltd., a Singapore company (35.0%

[4] 47 C.F.R. § 1.767(k)(2).

[5] Counsel for the applicants conferred with the Commission via videoconference on June 2, 2026. This Restated and Amended Application is being submitted pursuant to that discussion at the Commission's request and in order to facilitate expedited processing.

[6] Mr. Russell Matulich and Ms. Christine Matulich, both U.S. citizens, jointly own Making Chaos Global, LLC. The shares were transferred by the Matulichs to Making Chaos Global, LLC on November 16, 2020.

voting and equity interest).[7] Prior to the separate transactions discussed below, the remaining voting and equity interests in HMB Solutions were held by individuals and entities, none of which had a 10-percent-or-greater direct or indirect voting or equity interest.

B. BOC-LA1 LLC ("BOC") and Forager Holdings Corp. ("Forager") – Transferees

BOC is owned by Mr. Paul Huntsman and Mr. Benjamin Wu, both U.S. citizens. Messrs. Huntsman and Wu, through their control of Forager, also hold indirect control over TeleGuam Holdings, LLC ("GTA")[8], which in turn holds direct and indirect control over GNC.

On December 15, 2023, Messrs. Wu and Huntsman, and Forager executed a Membership Interest Purchase Agreement pursuant to which Messrs. Wu and Huntsman agreed to sell their 50% membership interests (totaling 100%) in BOC to Forager for the agreed upon consideration. As with BOC, Forager is controlled by Messrs. Wu and Huntsman.[9] Formal closing of this pro forma transaction awaits Commission approval and recordation in the HMB Solutions stock registry.

II. Description of the Transactions

On August 11, 2023, BOC entered into separate Stock Purchase Agreements with several independent shareholders of HMB Solutions, including but not limited to Mr. Brian Mass, Mr. Chris Brungardt and LSF Capital Pte. Ltd., and BOC has now acquired 70.8% of the voting and equity interest of HMB Solutions. Because the effective closing of these separate Stock

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[7] LSF Capital Pte. Ltd. is owned by Datuk Lim Soon Foo, a Malaysian citizen (75.0% voting and equity interest) and Mr. Cheng Hong Ng, a Malaysian citizen (25.0% voting and equity interest).

[8] *See* Public Notice, Internal Authorizations Granted, Section 214 Applications (47 C.F.R. § 63.18); Section 310(B) Requests, 32 FCC Rcd. 5490, 5491 (2017).

[9] Mr. Wu holds the voting control of Forager and Mr. Huntsman holds the substantial majority of the economic ownership interest in Forager.

Purchase Agreements has already occurred,[10] the Applicants filed for and were granted special temporary authority ("STA") to allow HMB Solutions to continue operating the JGA North submarine cable system while the Commission considers this application.[11]

In addition to the August 11, 2023 transaction and the December 2023 Membership Interest Purchase Agreement, Forager and BOC entered into an agreement to acquire the shares controlled by the Matulichs and Making Chaos Global on April 15, 2024. Both the December 2023 Membership Interest Purchase Agreement and the April 2024 transaction will close following Commission approval of this application and the recordation of the transfer in the stock registry of HMB Solutions.

The transactions are transparent to all HMB Solutions' customers. All existing HMB Solutions customers are continuing to be served by HMB Solutions pursuant to its existing authorizations as well as its existing contracts. The Applicants intend for HMB Solutions' existing management team and personnel to remain in place, ensuring that HMB Solutions' managerial, technical, and operational standards will be maintained. The only change from the transactions is that Forager via its ownership of BOC will now hold 99% of the voting equity of HMB Solutions rather than Mr. Mass, Mr. Brungardt, LSF Capital, Making Chaos Global, and several other individual shareholders.[12]

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[10] The Applicants disclosed the closings of these Stock Purchase Agreements to the Office of International Affairs in a telephone call on September 11, 2023. RTI Solutions (d/b/a HMB Solutions) and the Enforcement Bureau entered into a consent decree to resolve the Enforcement Bureau's investigation into whether the company failed to obtain prior approval before transferring control to BOC. RTI Solutions, File No. EB-IHD-24-00036957, *Consent Decree*, DA 25-545 (Jun. 30, 2025).

[11] RTI Solutions Inc., SCL-STA-20230928-00028 (Nov. 19, 2024).

[12] Since entering into agreement to acquire the equity interest of Making Chaos Global in April 2024, BOC also agreed to acquire additional equity interests from residual minority shareholders, each of whom is an individual holding less than a 5% interest. Those acquisitions will result in

Diagrams depicting the pre-transaction ownership, the ownership following the August 11, 2023 transaction, and the ownership following Commission approval of the application and consummation are attached.

III. Approval of the Transactions Will Serve the Public Interest

The transactions are in the public interest. BOC is well qualified to become the new majority owner of HMB Solutions. BOC benefits from financial and managerial resources of its direct owners and affiliates, most notably Huntsman Family Investments, LLC. As a result of its new ownership, HMB Solutions will potentially enjoy access to these resources as well, which will ultimately benefit HMB Solutions' customers as well as customers of the JGA North submarine cable system.

At the same time, HMB Solutions will maintain and gain new momentum to improve its services and solutions while continuing to operate pursuant to existing service arrangements. The transactions are effectively transparent to HMB Solutions customers and those customers will incur no loss or diminishment of service whatsoever. In addition, as a result of BOC's purchase of these shares, a substantial majority of the foreign ownership of HMB Solutions has been eliminated as LSF Capital Pte. Ltd., a Singaporean entity that had a 35.0% voting and equity interest, and The Fourys Trust, an Australian entity that had a 6.3% voting and equity interest, no longer have any ownership in HMB Solutions. HMB Solutions has already been vetted by the U.S. Department of Justice, U.S. Department of Defense and U.S. Department of Homeland Security (collectively, the "Executive Branch Agencies") when its initial license was

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99% of the voting equity of HMB Solutions being owned and controlled by Forager via its 100% ownership of BOC.

granted in July 2020.[13] That review resulted in the execution of a National Security Agreement ("NSA") administered and overseen by the Executive Branch Agencies, and HMB Solutions remains subject to all terms and conditions of the NSA. Likewise, the new owners of BOC were vetted by the Executive Branch Agencies when its principals acquired a controlling interest in GTA in 2017.[14] Accordingly, the transactions do not include any foreign ownership that should raise national security or law enforcement concerns.

The transactions also pose no threat to competition in Guam, the national U.S. market, or abroad. There will thus be no concentration of resources or elimination of competitors. The communications market sectors in Guam will remain highly competitive.

The Applicants submit that the transactions raise no additional concerns, and indeed, should mitigate important national security concerns as a result of the significantly reduced foreign ownership in HMB Solutions. Consistent with ongoing obligations related to the NSA, the Applicants have kept the Executive Branch Agencies apprised of the ownership changes set forth herein and in the attached post-consummation organizational charts. To date, no questions or issues have been raised, but the Applicants stand ready to address any questions that may arise.

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[13] *See* Public Notice, Actions Taken Under the Cable Landing License Act, Section 1.767(a) Cable Landing Licenses, Modifications, and Assignments or Transfers of Control of Interests in Cable Landing Licenses (47 C.F.R. § 1.767(a)), 35 FCC Rcd. 7904, 7905 (2020).

[14] *See* Public Notice, Internal Authorizations Granted, Section 214 Applications (47 C.F.R. § 63.18); Section 310(B) Requests, 32 FCC Rcd. 5490, 5491 (2017).

IV. Information Required by Section 1.767(a) of the Commission's Rules

Under Section 1.767(a) of the Commission's rules, applications for cable landing licenses, including for transfers of indirect control over such licensees, must contain certain information.[15] Applicants provide this information here.

(1) The name, address and telephone number(s) of the applicant(s) – 47 C.F.R. § 1.767(a)(1)

Forager Holdings Corp.
500 Huntsman Way
Salt Lake City, Utah 84108
714-717-7560
FRN: 0026227744

BOC-LA1 LLC
500 Huntsman Way
Salt Lake City, Utah 84108
714-717-7560
FRN: 0034295006

RTI Solutions, Inc.
7 Turtleback Lane
Westport, CT 06880
917-575-0695
FRN: 0027052489

(2) The Government, State, or Territory under the laws of which each corporate or partnership applicant is organized – 47 C.F.R. § 1.767(a)(2)

BOC is a Delaware limited liability company, and Forager is a Delaware corporation. HMB Solutions is a California corporation.

(3) The name, title, post office address, and telephone number of the officer and any other contact point, such as legal counsel, to whom correspondence concerning the application is to be addressed – 47 C.F.R. § 1.767(a)(3)

For HMB Solutions:
Brian Mass
Chief Executive Officer and Chief Financial Officer
RTI Solutions, Inc. d/b/a HMB Solutions
7 Turtleback Lane
Westport, CT 06880

[15] 47 C.F.R. § 1.767(a).

917-575-0695
brian.mass@hmb-s.com

with a copy to:
Christopher Bjornson
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For BOC:
Benjamin Wu
Partner
c/o Huntsman Family Investments
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with a copy to:
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Steptoe LLP
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For Forager:
Benjamin Wu
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Washington, D.C. 20036
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(4-7) – 47 C.F.R. § 1.767(a)(4-7) – Not applicable

(8)(i) Certification and Ownership Information Required by Sections 63.18(h), (o), (p), and (q) of the Commission's Rules—47 C.F.R. § 1.767(a)(8)(i)

Section 63.18(h) Ownership Information
BOC has agreed to purchase the shares of HMB Solutions that were previously held by Making Chaos Global, LLC, Mr. Mass, Mr. Brungardt, LSF Capital Pte. Ltd. and several other shareholders. BOC will own 99% of the voting and equity interest in HMB Solutions.

Forager will own 100% of BOC. Mr. Wu holds the voting control of Forager and Mr. Huntsman holds the substantial majority of the economic ownership interest in Forager. Mr. Wu and Mr. Huntsman hold their interests in Forager through Mr. Wu's ownership of B88 Financial Group LLC (100% voting shares and 1% non-voting equity) and Mr. Huntsman's indirect ownership of Mariana Holdings LLC (79% non-voting equity). The principal business of BOC, Forager and their affiliates, is investments. The address for Forager, Mr. Wu, and Mr. Huntsman is 500 Huntsman Way, Salt Lake City, UT 84108. Mr. Wu and Mr. Huntsman are U.S. citizens.

No other person or entity, directly or indirectly, controls or owns a ten percent or greater voting or equity interest in HMB Solutions.

Stonepeak Grouper Holdings holds 100% of the Series A Preferred Shares of Forager, translating to a 9% equity interest.

BOC has also purchased RTI Infrastructure, Inc. d/b/a HMB IX, a separate legal entity that is shown in the attached post-consummation organizational diagrams.

Diagrams showing the pre-transaction, post-August 11, 2023-transaction ownership, and post-approval-and-consummation ownership structures are attached to the application.

Section 63.18(h) Interlocking Directorates
Neither BOC nor HMB Solutions has any interlocking directorates with any foreign carrier.

Section 63.18(o) Certification Regarding the Anti-Drug Abuse Act of 1988
As evidenced by the signatures of Applicants' representatives to this application, Applicants certify that, pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules, they are not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

Section 63.18(p) Foreign Ownership Information
No individual or entity that is not a U.S. citizen will hold a ten percent or greater direct or indirect equity or voting interest, or a controlling interest, in the licensee.

Section 63.18(q) Applicant Certifications
Each applicant to this application through its signature to the application makes the following certifications and agrees:

(i) To comply with all applicable Communications Assistance for Law Enforcement Act (CALEA) requirements and related rules and regulations, including any and all FCC orders and opinions governing the application of CALEA, pursuant to the Communications Assistance for Law Enforcement Act and the Commission's rules and regulations in part 1, subpart Z, of this chapter;

(ii) To make communications to, from, or within the United States, as well as records thereof, available in a form and location that permits them to be subject to a valid and lawful request or legal process in accordance with U.S. law, including but not limited to:

(A) The Wiretap Act, 18 U.S.C. 2510 et seq.;

(B) The Stored Communications Act, 18 U.S.C. 2701 et seq.;

(C) The Pen Register and Trap and Trace Statute, 18 U.S.C. 3121 et seq.; and

(D) Other court orders, subpoenas or other legal process;

(iii) To designate a point of contact who is located in the United States and is a U.S. citizen or lawful U.S. permanent resident, for the execution of lawful requests and as an agent for legal service of process;

(iv)

(A) That the applicant is responsible for the continuing accuracy and completeness of all information submitted, whether at the time of submission of the application or subsequently in response to either the Commission or the Committee's request, as required in § 1.65(a) of this chapter, and that the applicant agrees to inform the Commission and the Committee of any substantial and significant changes while an application is pending; and

(B) After the application is no longer pending for purposes of § 1.65 of the rules, the applicant must notify the Commission and the Committee of any changes in the authorization holder or licensee information and/or contact information promptly, and in any event within thirty (30) days; and

(v) That the applicant understands that if the applicant or authorization holder fails to fulfill any of the conditions and obligations set forth in the certifications set out in paragraph (q) of this section or in the grant of an application or authorization and/or that if the information provided to the United States Government is materially false, fictitious, or fraudulent, applicant and authorization holder may be subject to all remedies available to the United States Government, including but not limited to revocation and/or termination of the Commission's authorization or license, and criminal and civil penalties, including penalties under 18 U.S.C. 1001.

(8)(ii) Certification Regarding Foreign Carrier Status and Foreign Affiliation—47 C.F.R. § 1.767(a)(8)(ii)

As evidenced by the signatures of Applicants' representatives to this application, Applicants certify that they are not foreign carriers, nor are they affiliated with foreign carriers, nor will they become affiliated with foreign carriers as a result of this transaction.

(8)(iii) Certification Regarding Destination Markets—47 C.F.R. § 1.767(a)(8)(iii)

As evidenced by the signatures of Applicants' representatives to this application, Applicants certify that they do not seek to land and operate a submarine cable connection to or provide international telecommunications services to any destination country where:

> (1) An Applicant is a foreign carrier in that country; or
> (2) An Applicant controls a foreign carrier in that country; or
> (3) Any entity that owns more than 25 percent of Applicants, or that controls Applicants, 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 percent of Applicants and are parties to, or the beneficiaries of, a contractual relation affecting the provision or marketing or international basic telecommunications services in the United States.

(9) Certification of Compliance—47 C.F.R. § 1.767(a)(9)

As evidenced by the signatures of Applicants' representatives to this application, Applicants certify that they accept and will abide by the routine conditions set forth in Section 1.767(g) of the Commission's Rules, 47 C.F.R. § 1.767(g).

(10) 47 C.F.R. § 1.767(a)(10) – Not applicable

V. Request for Streamlined Processing

The Applicants hereby request streamlined processing. None of the Applicants are or will be affiliated with a dominant foreign carrier. Moreover, this application raises no competition or public interest concerns that would require consideration outside of the Commission's streamlined review process. For all of these reasons, this application is eligible for streamlined processing.

VI. Conclusion

Based on the foregoing, the Applicants respectfully submit that the public interest, convenience, and necessity would be furthered by grant of this application and transferring control over RTI Solutions to BOC directly and Forager indirectly.

Respectfully submitted,

BOC-LA1 LLC and Forager Holdings Corp.

/s/
____

Benjamin Wu
500 Huntsman Way
Salt Lake City, Utah 84108
714-717-7560
ben@hfinvestments.com

RTI Solutions, Inc. d/b/a
HMB Solutions

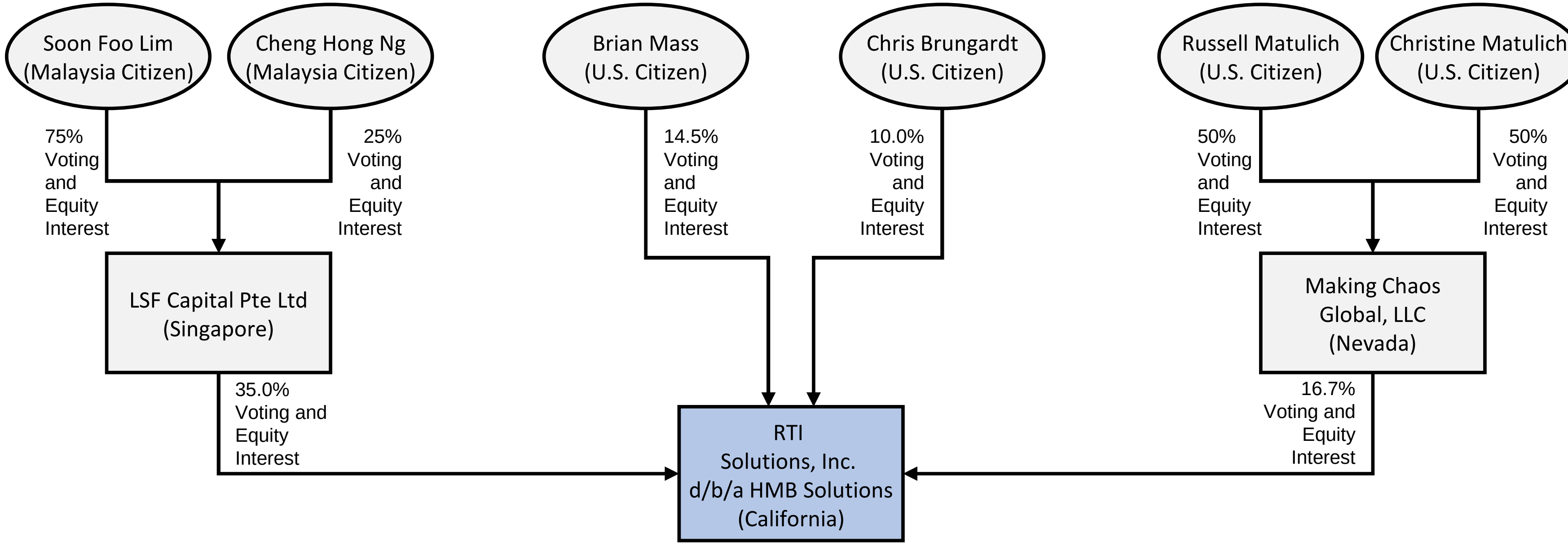
/s/
____

Brian Mass
7 Turtleback Lane
Westport, CT 06880
917-575-0695
brian.mass@hmb-s.com
Chief Executive Officer and Chief
Financial Officer, HMB Solutions

Attachments

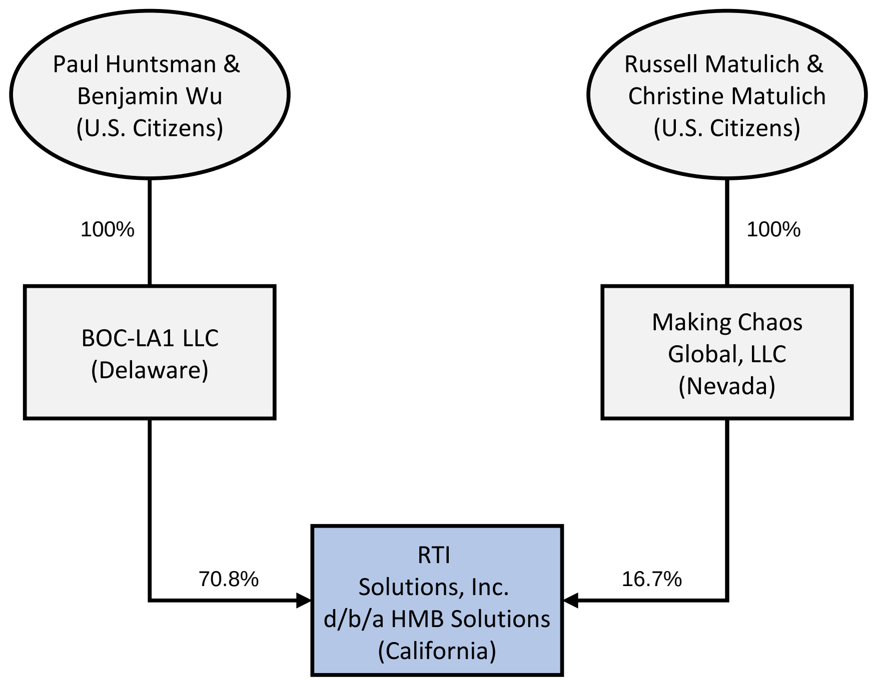
Ownership Diagrams

HMB Solutions Ownership (Pre-Consummation)



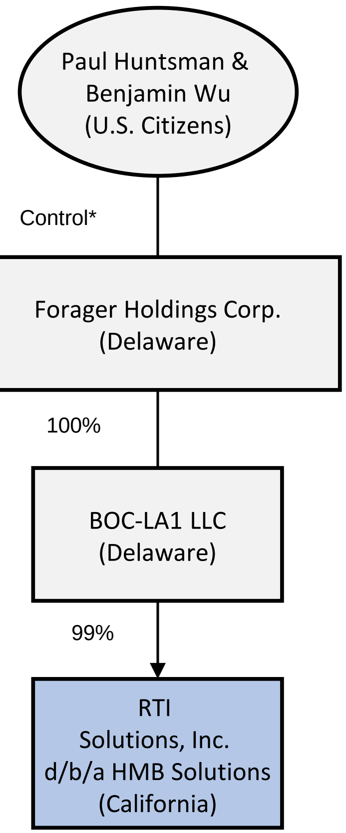
HMB Solutions Ownership (Post-August 11, 2023 Transaction)

10%+ interest holders identified



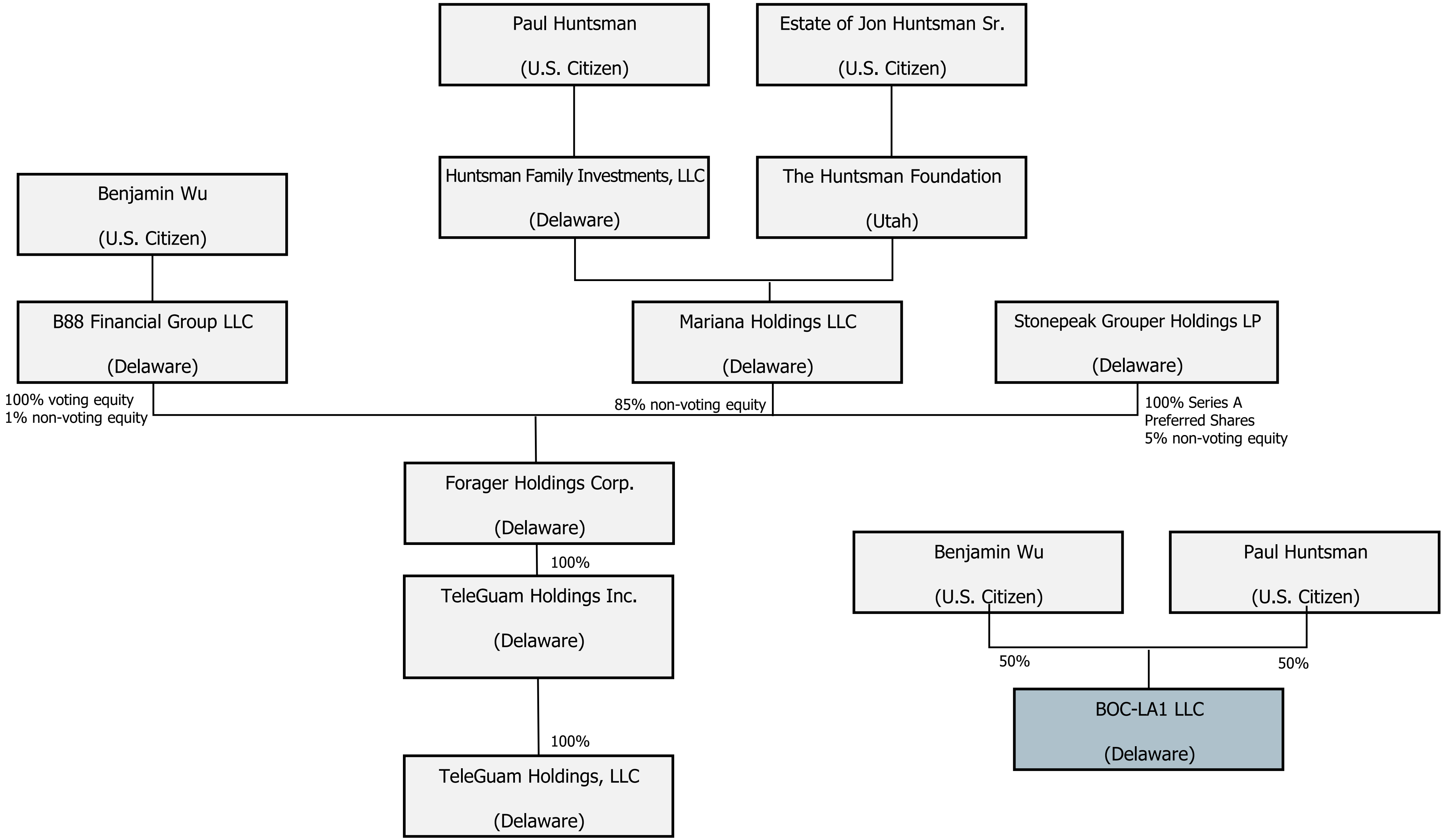
HMB Solutions Ownership (Post-Consummation)

10%+ interest holders identified



*Forager is controlled by Messrs. Wu and Huntsman. See the accompanying Forager, GTA and BOC-LA1 LLC diagrams for detailed Forager ownership.

Forager, GTA and BOC-LA1 Ownership (Pre-Consummation)



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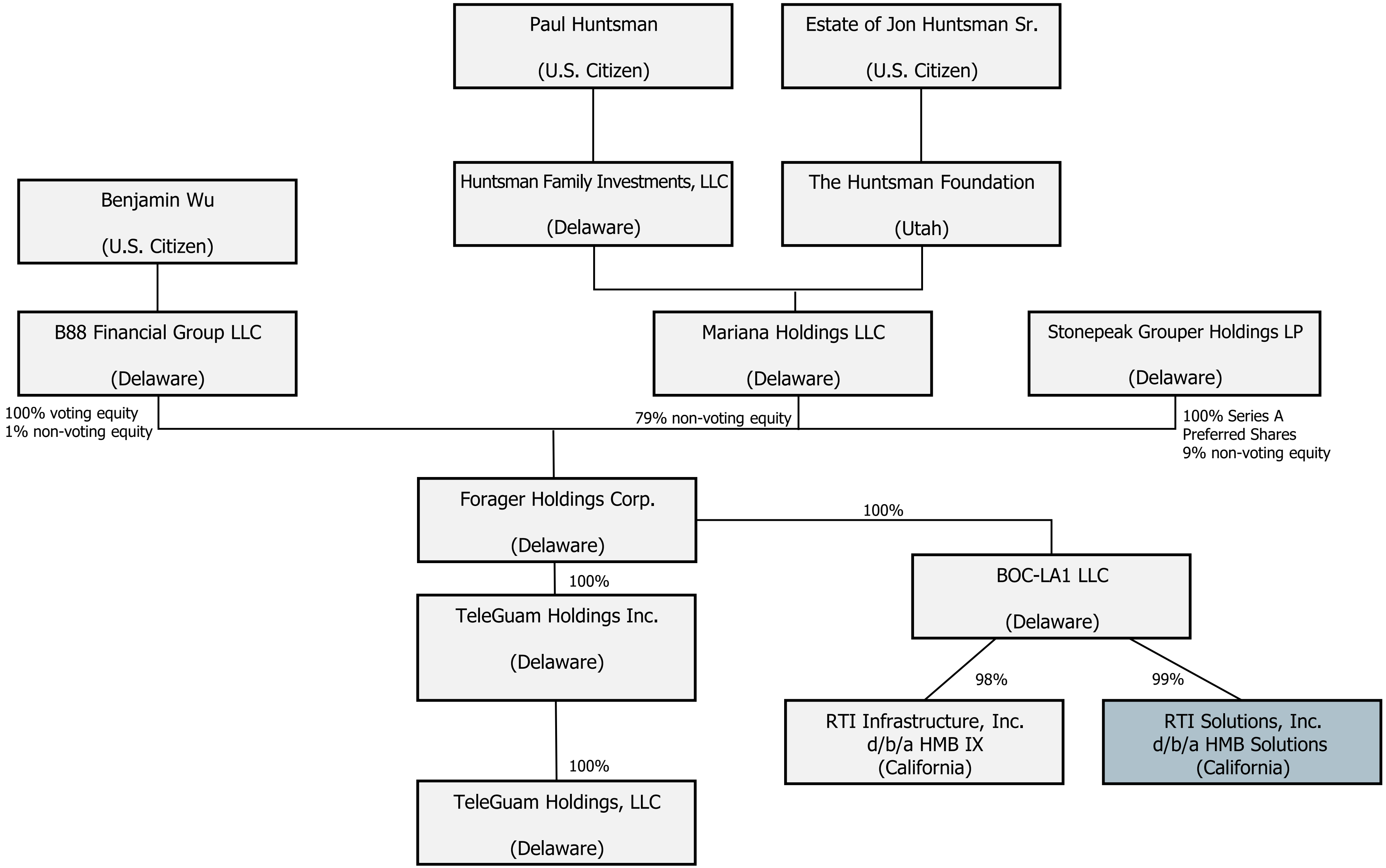
Note: Excludes non-voting minority shareholders of Forager Holdings Corp and Mariana Holdings LLC except for Stonepeak. All minority shareholders, including Stonepeak, hold less than 10 percent of the equity and no voting shares, and are owned and controlled by U.S. Citizens.

Forager, GTA, BOC-LA1, HMB IX and HMB Solutions Ownership (Post-Consummation)



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Note: Excludes non-voting minority shareholders of Forager Holdings Corp and Mariana Holdings LLC except for Stonepeak. All minority shareholders, including Stonepeak, hold less than 10 percent of the equity and no voting shares, and are owned and controlled by U.S. Citizens.

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