

FOREIGN OWNERSHIP DISCLOSURES

Ownership Interests in Applicant and Subsidiary

The specific equity and voting interests of all disclosable interest holders (“Disclosable Interest Holders”) in Tampnet Inc. is set forth in the ownership diagram in Revised Exhibit E-1. The equity and voting interests for each of the individuals and entities reflected in the ownership diagram are calculated according to the Commission’s attribution rules and reflect the aggregate interests of the individuals and entities disclosed on the diagram. The following narrative explanation is intended to mirror the description of interests as set forth in the ownership diagram (Exhibit E-1).

Tampnet Licensee LLC (as shown on p. 1, Exh. B) is a wholly-owned subsidiary of Tampnet Inc., a United States corporation.

Tampnet Inc. is a wholly-owned subsidiary of Tampnet AS, a corporation organized under the laws of Norway.

Tampnet AS is a wholly-owned subsidiary of Brent Invest AS, a corporation organized under the laws of Norway.

Brent Invest AS is a wholly owned subsidiary of Brent Holding AS, a corporation organized under the laws of Norway.

Brent Holding AS is a subsidiary of Brent Infrastructure I B.V., a limited liability company organized under the laws of the Netherlands which owns 94.92% of the company. The remaining 5.08% interest in Brent Holding AS is held by individual shareholders, each of whom hold less than 5% equity or voting).

Brent Infrastructure I B.V. is a 50-50 joint venture of Brent Infrastructure I S.à.r.l. and Brent Infrastructure II SA. The day-to-day business operations, activities, or decisions of Brent Infrastructure I B.V. are handled by three non-member managers (Directors) as shown on Page 1 of the ownership diagram, attached as Exhibit B.

Brent Infrastructure I S.à.r.l (p. 2, Exh. B), a limited liability corporate entity organized under the laws of Luxembourg, is wholly owned by Brent Holding Guernsey Limited. The day-to-day business operations, activities, or decisions of Brent Infrastructure I S.a.r.l. are handled by four non-member managers (Directors) as shown on Page 2 of the ownership diagram (Exh. B).

Brent Holding Guernsey Limited, a private company organized under the laws of Guernsey, is 98.65% owned by several limited partnerships, two of which have disclosable interests and are limited partnerships organized under the laws of Guernsey: EQT Infrastructure (No. 1) Limited Partnership, a limited partnership organized under the laws of England and Wales, and EQT Infrastructure (No. 3) Limited Partnership a limited partnership organized under the laws of England. For simplicity, the limited partnerships are referred to as the “EQT Infrastructure Fund”; however, EQT Infrastructure Fund has no legal presence.

Each limited partnership in EQT Infrastructure Fund is managed and controlled by a general partner, EQT Infrastructure (General Partner) LP, a limited partnership organized under the laws of Guernsey, which holds a 1% equity interest in EQT Infrastructure Fund (which corresponds to a 1% interest in each limited partnership). None of the remaining limited partners holding interests in the limited partnerships that comprise the EQT Infrastructure Fund holds 10% or more of the equity or voting interest in Tampnet, and all of which are insulated. EQT Infrastructure (General Partner) LP has three general partners: EQT Infrastructure Limited, EQT Infrastructure LLP, and EQT V GmbH & Co. KG.

EQT Infrastructure LLP (p. 3, Exh. B), a limited liability partnership organized under the laws of Guernsey, is 100% indirectly owned by SEP Holdings B.V. SEP Holdings B.V. holds that interest through its respective interests in EQT Infrastructure Limited, a private corporation organized under the laws of Guernsey, and EQT Funds Management Limited, a private corporation organized under the laws of Guernsey, each of whom hold a 50% interest in EQT Infrastructure LLP.

Although EQT Infrastructure LLP and EQT V GmbH & Co. KG, a limited partnership organized under the laws of Germany, are additional general partners of EQT Infrastructure (General Partner) LP, under the partnership agreement, neither has the ability to control or be involved in the day-to-day business operations, activities, or decisions of EQT Infrastructure (General Partner) LP.

Karl Heinz Horrer, an individual of German citizenship is the sole director of EQT V Verwaltung GmbH. EQT V Verwaltung GmbH, a limited liability company organized under the laws of Germany, is the general partner of EQT V GmbH & Co. KG.

SEP Holdings B.V., a limited liability company organized under the laws of the Netherlands, is owned by four entities, only two of which hold a 10% or more interest in Tampnet: SEP Integrated I B.V. and SEP Integrated II B.V. (SEP Integrated III B.V. and SEP Integrated IV B.V. are not identified on the ownership chart, Exhibit B, although certain disclosable interest holders hold their interests through these entities.) SEP Holdings B.V. is managed and controlled by the non-member managers (Directors) listed on Page 3 of Exhibit B. The shareholders/members of SEP Holdings B.V. are insulated (as described in the certification attached as Exhibit D).

SEP Integrated I B.V. (p. 7, Exh. B), a limited liability company organized under the laws of the Netherlands, is owned by 8 entities and individuals, all of which are insulated, and 6 of which hold a 10% or more interest in Tampnet: SEPCO B.V., a limited liability company organized under the laws of the Netherlands, SkogCo B.V., Trill B.V., TomCo 2 B.V., Michael Föcking, and Paul de Rome. SEP Integrated I B.V. is managed and controlled by the non-member managers (Directors) listed on Page 7 of Exhibit B.

SEP Integrated II B.V. (p. 7, Ex. B), a limited liability company organized under the laws of the Netherlands, is owned by 12 entities and individuals, all of which are insulated and only two of which hold a 10% or more interest in Tampnet: Rakso Holding B.V., a limited liability company organized under the laws of the Netherlands and Qarlbo Associates. Two individuals hold a disclosable interest each in Rakso Holding B.V.: Christian Sinding, a Norwegian citizen and Casper Callerstrom a Swedish citizen. Rakso Holding B.V. is managed and controlled by the non-member managers (Directors) listed on Page 10 of Exhibit B.

Brent Infrastructure II SA (p. 4, Ex. B), a public limited company organized under the laws of Luxembourg, is a wholly owned subsidiary of Brent Infrastructure Holding B.V..

Brent Infrastructure Holding B.V., a limited liability company organized under the laws of the Netherlands, is a wholly owned subsidiary of Brent Infrastructure II Holding S.à.r.l. Brent Infrastructure Holding B.V. and Brent Infrastructure II Holding S.à.r.l. are managed and controlled by the non-member managers (Directors) listed on Page 4 of Exhibit B.

Brent Infrastructure II Holding S.à.r.l., a limited liability corporate entity organized under the laws of Luxembourg, is 98.96% owned by EQT Infrastructure II Limited Partnership.

EQT Infrastructure II Limited Partnership, a limited partnership organized under the laws of the Netherlands, is wholly-owned by four limited partnerships (pp. 4-5, Ex. B). Only two of

the limited partnerships hold a 10% or more interest in Tampnet: EQT Infrastructure II (No. 1) Feeder LP, a limited partnership organized under the laws of the U.K., and EQT Infrastructure II (No. 2) Feeder LP, a limited partnership organized under the laws of the U.K. The limited partners of EQT Infrastructure II Limited Partnership are insulated. EQT Infrastructure II Limited Partnership is managed and controlled by its general partner, EQT Infrastructure II GP B.V., a limited liability company organized under the laws of the Netherlands.

None of the limited partners in EQT Infrastructure II (No. 1) Feeder LP and EQT Infrastructure II (No. 2) Feeder LP (p. 5, Exh. B) hold a 10% or more interest in Tampnet and all are insulated. EQT Infrastructure II (No. 1) Feeder LP and EQT Infrastructure II (No. 2) Feeder LP are managed and controlled by a general partner, EQT Infrastructure II (GP) Limited, a private corporation organized under the laws of the U.K. EQT Infrastructure II (GP) Limited is a wholly owned subsidiary of EQT AB.

EQT Infrastructure II GP B.V. (p. 5, Exh. B) is a wholly owned subsidiary of EQT Holdings II B.V., a limited liability company organized under the laws of the Netherlands. EQT Infrastructure II GP B.V., a limited liability company organized under the laws of the Netherlands, is managed and controlled by a non-member manager, EQT Netherlands Management B.V., a limited liability company organized under the laws of the Netherlands. EQT Netherlands Management B.V. (p. 5, Exh. B) is a wholly-owned subsidiary of EQT AB, a private corporation organized under the laws of Sweden.

EQT Holdings B.V., a limited liability company organized under the laws of the Netherlands, is a wholly owned subsidiary of EQT AB. EQT Holdings II B.V., a limited liability company organized under the laws of the Netherlands, is owned by CBTJ Financial Services B.V., Investor Netherlands B.V., and EQT Holdings B.V. EQT Holdings B.V. and EQT

Holdings II B.V. are managed and controlled by the non-member managers (Directors) listed on page 5 of Exhibit B.

The Knut and Alice Wallenberg Foundation (p. 6, Exh. B), a foundation formed under the laws of Sweden, holds an indirect 42.2% calculated voting interest in Tampnet Inc. through the following entities: Investor AB,¹ a public corporation formed under the laws of Sweden; Investor Investment Holdings AB, a public corporation formed under the laws of Sweden; EQT AB (discussed above); and Investor Growth Capital Holding B.V., a limited liability company formed under the laws of Netherlands. Investor AB (p. 6, Exh. B) and Investor Investments Holding AB, are both corporations organized under the laws of Sweden, and both hold an indirect 100% calculated voting interest in Tampnet Inc.

EQT International Holdings B.V. (p. 8, Exh. B), a limited liability company organized under the laws of the Netherlands, holds an indirect 81% calculated voting interest in Tampnet Inc. and is a wholly owned subsidiary of EQT Holdings Coöperatief W.A. EQT International Holdings B.V. is managed and controlled by the non-member managers (Directors) listed on page 8 of Exhibit B.

EQT Holdings Coöperatief W.A., a cooperative organized under the laws of the Netherlands, is owned by several entities, none of which hold more than a 5% interest in Tampnet Inc. The shareholders/members of EQT Holdings Coöperatief W.A. are insulated (as described in the certification attached as Exhibit D). EQT Holdings Coöperatief W.A. is managed and controlled by CM Capital B.V., a limited liability company organized under the

¹ Publicly available information confirms that no other non-U.S. shareholder of Investor AB holds, directly or indirectly, through one or more intervening entities, 10% or more of the equity interests and/or voting interests, or a controlling interest, in Investor AB. See <http://www.investorab.com/investors-media/share-information/ownership-structure/> (last visited Mar. 10, 2016).

laws of the Netherlands. EQT HC Holdings I B.V., a limited liability company organized under the laws of the Netherlands holds a 5% voting interest in Tampnet Inc.

CBTJ Financial Services B.V. (p. 9, Exh. B), a limited liability company organized under the laws of the Netherlands, owns 100% of EQT V Verwaltung GmbH. The shareholders/members of CBTJ Financial Services B.V. are insulated (as described in the certification attached as Exhibit D).

Additional indirect ownership interests in Tampnet Inc. are held through SEP Holdings, B.V.; EQT Holdings Cooperatief W.A.; and, CBTJ Financial Services B.V. Eighteen individuals, through various personal holding companies, hold disclosable indirect voting interests in Tampnet Inc. through these three entities (hereafter the “Feeder Entities”). These individuals and their disclosable (indirect voting) interests are set forth on pp. 10-14 of Exh. B.

2. Control of Tampnet Inc.

Tampnet Inc. is, and will continue to be, controlled by its Board of Directors and company officers, who are responsible for the management and oversee the day-to-day operations of the company. The board of Tampnet Inc.’s parent company, Tampnet AS, will also exercise indirect control over Tampnet Inc. through the Tampnet AS Board of Director’s power to appoint members of the Tampnet Inc. Board of Directors.

The individuals and entities with disclosable interests in Tampnet Inc., the Disclosable Interest Holders, as identified on the attached ownership diagram, do not exert control over the management or operations of Tampnet Inc. These Disclosable Interest Holders do have the right to appoint Board members of the intermediary entities through which they hold their indirect interests in Tampnet Inc., and as such have “controlling” interests in Tampnet Inc. to the extent reflected by their indirect voting interests as shown in Exhibit B. Thus, the Disclosable Interest

Holders with a 10%, or greater, interest can and do exert control through their ability to vote (consistent with their interests) on the selection, approval and removal of the Board members of the various intermediary entities with interests in Tampnet Inc.

However, none of the Disclosable Interest Holders, other than Mr. Karl Heinz Horrер,² hold indirect voting interests in Tampnet Inc. greater than 49.99%. Notably, none of these individuals holds any equity interest, direct or indirect, in Tampnet Inc. Thus, other than Mr. Horrер, none of these persons have *de jure* control of Tampnet Inc. Additionally, none of these persons have entered into a voting agreement to act together for the purpose of acquiring, holding, voting, or disposing of their interests in (or otherwise controlling, as described above) Tampnet Inc., or any of its subsidiaries.

Further, none of these persons exert control over Tampnet Inc. in a manner that would establish that they have *de facto* control under the Commission's traditional analytical framework.³ First, none of these Disclosable Interest Holders have unfettered use of the licenses held by Tampnet Inc. (nor will they have unfettered use of the license to be acquired). Second, the Disclosable Interest Holders do not control daily operations of Tampnet Inc. As noted above, the officers and directors of Tampnet Inc. are responsible for the daily operations of the company, and they operate under a duty to act in the best interests of the company as a whole.⁴

Third, policy decisions are made by the officers and directors of Tampnet Inc., and the

² Under the FCC's attribution rules Mr. Karl Heinz Horrер is deemed to hold a 100% indirect voting interest in Tampnet Inc. by virtue of his role as Director of EQT V Verwaltung GmbH. However, Mr. Horrер is not directly involved in the management or operations of Tampnet Inc. and exercises no control over the operations of the company. Further, the organization to which Mr. Horrер serves as a Director, EQT V Verwaltung GmbH, has no authority to take part in the management or control of EQT Infrastructure Limited, or Tampnet Inc. (or any of its subsidiaries). Thus, Mr. Horrер and EQT V Verwaltung GmbH are effectively insulated from exerting any control over Tampnet Inc. or any of its subsidiaries.

³ See *Applications of Intermountain Microwave*, 24 Rad Reg. (P&F) 983 (1963); *In Re Application of Ellis Thompson Corp.*, 10 F.C.C. Rcd. 12554 (1995).

⁴ Indeed, many of the organizational documents for the legal entities that constitute the Disclosable Interest Holders specifically limit the authority of the limited partners, or non-manager LLC members, from having any role in the control or operations of the respective partnership or LLC (and, by extension, Tampnet Inc.).

Disclosable Interest Holders have no role in such decisions. Fourth, officers and directors of Tampnet Inc. are responsible for employment, supervision and dismissal of personnel, and the Disclosable Interest Holders have no role in such decisions. Fifth, officers and directors of Tampnet Inc. are responsible for the payment of financing obligations, including expenses arising out of operations, and the Disclosable Interest Holders have no role in such matters. Sixth, the Disclosable Interest Holders do not directly receive moneys and profits from the operation of facilities. Thus, under the Commission's own precedent, the Disclosable Interest Holders do not have any of the indicia of control that would suggest that they exert *de jure* control over Tampnet Inc. Accordingly, the interests held by the Disclosable Interests Holders are non-controlling interests.

The organizational documents for the three Feeder Entities through which these disclosable interests are held,⁵ do not contain language that explicitly insulates such interest holders from taking such action. However, representatives from each of the three feeder entities have certified that notwithstanding any provision of each entity's articles of association, or any other agreement, no foreign shareholder (i.e., non-U.S. citizen or entity not organized under the laws of the United States) of the entity is, or will be, engaged in active involvement in the management or operation of the Company or Tampnet Inc., or any of its subsidiaries. Representatives of the feeder entities have certified to the accuracy of these facts in the attached Exhibit D (Insulation Certifications).

Finally, the Knut and Alice Wallenberg Foundation (the "Foundation") hold a non-controlling, indirect 42.2% voting (but no equity) interest in Tampnet Inc. Petitioners have undertaken a diligent effort to discern how the Foundation is controlled. The purpose of the Foundation is to "promote scientific research and teaching and study activities ..."

⁵ The three "feeder" entities are CBTJ Financial Services, B.V., SEP Holdings B.V., and EQT Cooperatief W.A.

national benefit. Under Swedish law, specifically the Foundation Act (1994:1220), the board or administrator of a Swedish foundation is responsible for ensuring the provisions of the foundation's deeds are following, and unless otherwise stated, are responsible for the investment of the foundation's assets. Publicly available information establishes that while day to day activities of the Foundation are the responsibility of the Executive Director, the Board of Directors has the "ultimate responsibility" for management of the Foundation. The Foundation's Board Members are disclosed on the Foundation's website.⁶

⁶ See <https://www.wallenberg.com/kaw/en/foundation/board-directors> (last visited Mar. 9, 2016).