

Response to Questions 34 and A20 (Ownership)

Prior to closing the Proposed Transaction, Amalgamated Telecom Holdings Limited (“ATH”) will form a U.S.-incorporated holding company (“U.S. HoldCo”)¹ that ATH will designate to purchase all of the issued and outstanding member interests of AST Telecom, LLC d/b/a Bluesky (“AST”), so that, upon completion of the Proposed Transaction, AST will be a direct wholly-owned subsidiary of U.S. HoldCo. The following entities will hold an indirect 10-percent-or-greater ownership interest in AST post-closing:

Name: Amalgamated Telecom Holdings Limited (“ATH”)
Address: Level 2, Harbour Front Building, Rodwell Rd.
G.P.O. Box 11643
Suva, Fiji
Citizenship: Fiji
Principal Business: holding company
Ownership interest: ATH will hold a 100 percent equity and voting interest in U.S. Holdco

Name: Fiji National Provident Fund (“FNPF”)
Address: Plaza 2, 33 Ellery St., Private Mail Bag
Suva, Fiji
Citizenship: Fiji
Principal Business: Superannuation fund
Ownership interest: FNPF holds an approximate 72.6 percent equity and voting interest in ATH

Name: Fiji Government
Address: P.O. Box 2212, Government Buildings
Suva, Fiji
Citizenship: Fiji
Principal Business: government
Ownership interest: The Fiji government holds an approximate 17.3 percent equity and voting interest in ATH

No other person or entity will hold a direct or indirect 10-percent-or-greater equity or voting interest in AST post-closing. The Applicants also provide charts depicting the pre- and post-closing ownership structure of AST in Attachment B of Exhibit 1.

ATH and AST are also concurrently filing a petition for declaratory ruling (attached) that it would serve the public interest to permit the indirect foreign ownership of AST’s common carrier earth station license in excess of the 25 percent benchmark of Section 310(b)(4) of the Communications Act of 1934, as amended.

¹ ATH will notify the FCC of U.S. HoldCo’s name, address, and state of organization once it is formed.

Response to Question A21 (Public Interest Statement)

In Exhibit 1, attached hereto, the Applicants provide a complete description of the Proposed Transaction and an explanation of how it will serve the public interest.