ADDITIONAL INFORMATION IN SUPPORT OF ISPC APPLICATION

1. Justification for New ISPC

Pursuant to a phase-out plan agreed with the U.S. Departments of Justice and Homeland Security in July 2020 in connection with the Letter of Assurances and Letter of Agreement executed by its parent company, Amalgamated Telecom Holdings Limited (*see* IBFS File Nos. SCL-T/C-20161220-00026 and ITC-T/C-20161220-00377 and ULS File No. 0007584554), AST Telecom, LLC d/b/a Bluesky, is in the final phases of replacing its Huawei core network and radio access network with a new network supplied by Ericsson. It expects to complete this phase-out by December 2023.

As part of the final phase of this network transition, Bluesky will integrate and commission the new Ericsson network and decommission the old Huawei network. During this integration and commissioning phase, Bluesky will need to maintain a period of overlapping network stability whereby the certain components of the Huawei network would remain in place—a process that could take a number of months. Once this integration and commissioning phase is complete, AST will decommission and remove the Huawei equipment.

Because the two networks will run simultaneously for a few months during the integration and commissioning phase, Bluesky will need a separate International Signaling Point Code ("ISPC") for the Ericsson network. The overlap period between the two operating networks precludes use of Bluesky's existing ISPC for the Ericsson network, as each network will need to be identified separately.

2. Physical Locations

Bluesky will use one physical location for the ISPC:

AST Telecom, LLC d/b/a Bluesky
478 Laufou Shopping Center
Pago Pago, AS 96799

3. Timing

Bluesky needs the ISPC by August 1, 2023, when it expects to begin the integration and commissioning of the Ericsson network.