

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)

AirGSM Pte Ltd)
(FRN: 0038492179))

Application for Global Authority)
Pursuant to Section 214 of the)
Communications Act of 1934, as amended,)
to Operate as an International Resale Carrier)
Between the United States)
and Various International Points)
_____)

File No. ITC-214-20260723-00212

APPLICATION

AirGSM Pte Ltd d/b/a Airalo (“Airalo” or “Applicant”) hereby requests global resale authority, under Section 214 of the Communications Act of 1934, as amended (the “Act”), 47 U.S.C. § 214, and Sections 63.12 and 63.18(e)(2) of the Commission’s Rules, 47 C.F.R. §§ 63.12, 63.18(e)(2), to provide international telecommunications services between the United States and international points.

I. THE APPLICANT

Airalo is seeking authority to provide eSIMs for use in the U.S. Airalo is a company formed under the laws of Singapore located at 6 Raffles Boulevard, #03-308 Justco, Marina Square, Singapore 039594. Airalo is a wholly-owned subsidiary of AirGSM Holdings Inc. (“AirGSM Holdings”), a Delaware corporation. The 10% or greater direct owners of AirGSM Holdings are: Airplane Investment LP, a Delaware limited partnership (24.44%) and Surge Ventures II Limited, a Mauritius private company limited by shares (15.15%). Applicant’s ownership structure is depicted in **Appendix A** and is described below.

II. INFORMATION REQUIRED BY SECTION 63.18

Airalo submits the following information, as required by Section 63.18 of the Commission's Rules, in support of this Application:

(a) Name, address and telephone number of Applicant:

AirGSM Pte Ltd d/b/a Airalo
6 Raffles Boulevard
#03-308 Justco
Marina Square, Singapore 039594
Tel: +65 69116898

(b) Place of Organization: Applicant is organized under the laws of Singapore.

(c) Correspondence concerning this application should be sent to:

Danielle Burt
Leetal Weiss
Connor Haffey
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, N.W.
Washington, DC 20004
Tel: (202) 739-3000
Fax: (202) 739-3001
Email: danielle.burt@morganlewis.com
leetal.weiss@morganlewis.com
connor.haffey@morganlewis.com

with a copy to:

Carolyn Jameson
AirGSM Pte Ltd d/b/a Airalo
13 Danube Street
Edinburgh, EH4 1NN
Tel: +44 7825 663 494
Email: carolyn.jameson@airalo.com

(d) Statement as to whether applicant has previously received authority under Section 214: Airalo has not previously received authority under Section 214 of the Act.

(e) Requested Authority: Airalo requests global Section 214 authority to operate as a resale international carrier pursuant to Sections 63.18(e)(2), respectively, of the

Commission's Rules. Applicant certifies that it will comply with the terms and conditions of Sections 63.21 and 63.23 of the Commission's Rules.

(f) Not applicable.

(g) Not applicable.

(h) **Ownership of Applicant:** The following entities directly or indirectly own 10 percent or more of the Applicant:

1. Name: **AirGSM Holdings, Inc. ("AirGSM Holdings")**

Address: 16192 Coastal Hwy, Lewes, Delaware, 19958

Citizenship: Delaware

Principal Business: Holding Company

Interest in Applicant: 100% equity / voting directly in Applicant

2. Name: **Airplane Investment LP**

Address: 712 Fifth Avenue, 43rd Floor

New York, NY 10019

Citizenship: Delaware

Principal Business: Investment

Interest in Applicant: 31.43% equity / voting directly in AirGSM Holdings and indirectly in Applicant

Name: **Airplane Group Investment LP**

Address: 712 Fifth Avenue, 43rd Floor

New York, NY 10019

Citizenship: Delaware

Principal Business: Investment

Interest in Applicant: 31.412% equity / 31.12% deemed voting indirectly in Applicant (through a 99% interest in Airplane Investment LP)¹

Name: **Airplane GP LLC**

Address: 712 Fifth Avenue, 43rd Floor

New York, NY 10019

Citizenship: Delaware

Principal Business: Investment

Interest in Applicant: 0% equity / 31.43% voting indirectly in Applicant (as General Partner of Airplane Investment LP and Airplane Group Investment LP)

¹ Pursuant to 47 C.F.R. §63.18(h)(ii), a "partner of a limited partnership (other than a general partner) shall be deemed to hold a voting interest in the partnership that is equal to the partner's equity interest."

Name: **CVC Capital Partners Asia VI (A) LP**

Address: Level 1, IFC1, Esplanade

St. Helier, Jersey JE2 3BX

Citizenship: Jersey

Principal Business: Investment

Interest in Applicant: 25.93% equity / 31.43% voting indirectly in Applicant
(as 100% owner of Airplane GP LLC and through an 83.4% equity interest
in Airplane Group Investment LP)

No investor holds more than 10% of the equity interests in CVC Capital
Partners Asia VI (A) LP.

Name: **CVC Capital Partners Asia VI Limited**

Address: Level 1, IFC1, Esplanade

St. Helier, Jersey JE2 3BX

Citizenship: Jersey

Principal Business: Investment

Interest in Applicant: 25.93% equity / 31.43% voting indirectly in Applicant
(as general partner of CVC Capital Partners Asia VI (A) LP)

Name: **CVC Capital Partners PLC**

Address: Level 1, IFC1, Esplanade

St. Helier, Jersey JE2 3BX

Citizenship: Jersey

Principal Business: Investment

Interest in Applicant: 25.93% equity / 31.43% voting indirectly in Applicant
(as 100% owner of CVC Capital Partners Asia VI Limited)

CVC Capital Partners PLC is listed on Euronext Amsterdam, the regulated
market operated by Euronext Amsterdam N.V., and no investor holds more
than 10% of the equity interests in CVC Capital Partners PLC.

3. Name: **Surge Ventures II, Limited**

Address: C/O International Proximity, 24 Cybercity, 5th Floor

Ebene Esplanade, Ebene, Mauritius

Citizenship: Mauritius

Principal Business: Investment

Interest in Applicant: 15.15% equity / voting directly in AirGSM Holdings and
indirectly in Applicant

Name: **Peak XV Partners Seed Fund I Limited (formerly Sequoia India
& Southeast Asia)**

Address: C/O International Proximity, 24 Bank Street, 5th Floor

Ebene Esplanade Cybercity, Ebene Mauritius

Citizenship: Mauritius

Principal Business: Investment

Interest in Applicant: 11.57% equity / voting indirectly in Applicant (as direct 76.35% owner of Surge Ventures II, Limited)

To the best of Applicant's knowledge, no other individual or entity owns or controls more than 10% directly or indirectly of the Applicant. An ownership diagram is provided in **Appendix A**.

No director of Applicant is a director of a foreign carrier.

- (i) **Foreign Carrier Affiliation:** Airalo certifies that it
 - (A) is operating as a non-dominant foreign carrier in Austria, Belgium, Netherlands, Romania, and Spain ; and
 - (B) is not affiliated with any foreign carrier within the meaning of Section 63.09(d) of the Commission's Rules.
- (j) **Operation in Foreign Destinations:** Airalo certifies that it seeks to provide international telecommunications services to all global points, including Austria, Belgium, Netherlands, Spain, and Romania, in which Airalo is, or expects to become, a non-dominant foreign carrier.
- (k) **Foreign Carrier Certification on Market Power.** Airalo certifies that it operates as a non-dominant carrier in Austria, Belgium, Netherlands, and Spain and will operate as a non-dominant foreign carrier in Romania as it has less than 50 percent market power in each of the countries it is, or will be, a foreign carrier. Airalo is solely a resale provider of telecommunications services and therefore has no share in international transport facilities or services, including cable landing station access and backhaul facilities, intercity facilities or services, and local access facilities or services on the foreign end of any route.
- (l) Not applicable.
- (m) **Non-dominant Status.** Airalo certifies that it has less than 50 percent market power in each of the countries it is, or will be, a foreign carrier as it is solely a resale provider of telecommunications services and therefore has no share in international transport facilities or services, including cable landing station access and backhaul facilities, intercity facilities or services, and local access facilities or services on the foreign end of any route.
- (n) **No Special Concessions:** Airalo certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier where the foreign carrier possesses market power on the foreign end of the route and Airalo will not enter into such agreements in the future.

- (o) **Anti-Drug Abuse Act Certification:** Airalo certifies, pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules (implementing the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862), it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
- (p) **Responses to standard questions:** Airalo is submitting its responses to standard questions to the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector concurrently with this Application directly.
- (q) **Certification:** Airalo is providing its certification in **Appendix B.**
- (r) **Eligibility for Streamlined Processing:** Airalo is not requesting streamlined processing in light of the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector review.

III. **CONCLUSION**

For the reasons stated above, AirGSM Pte Ltd d/b/a Airalo respectfully submits that the public interest, convenience, and necessity would be furthered by a grant of this Application.

Respectfully submitted,

/s/ Danielle Burt

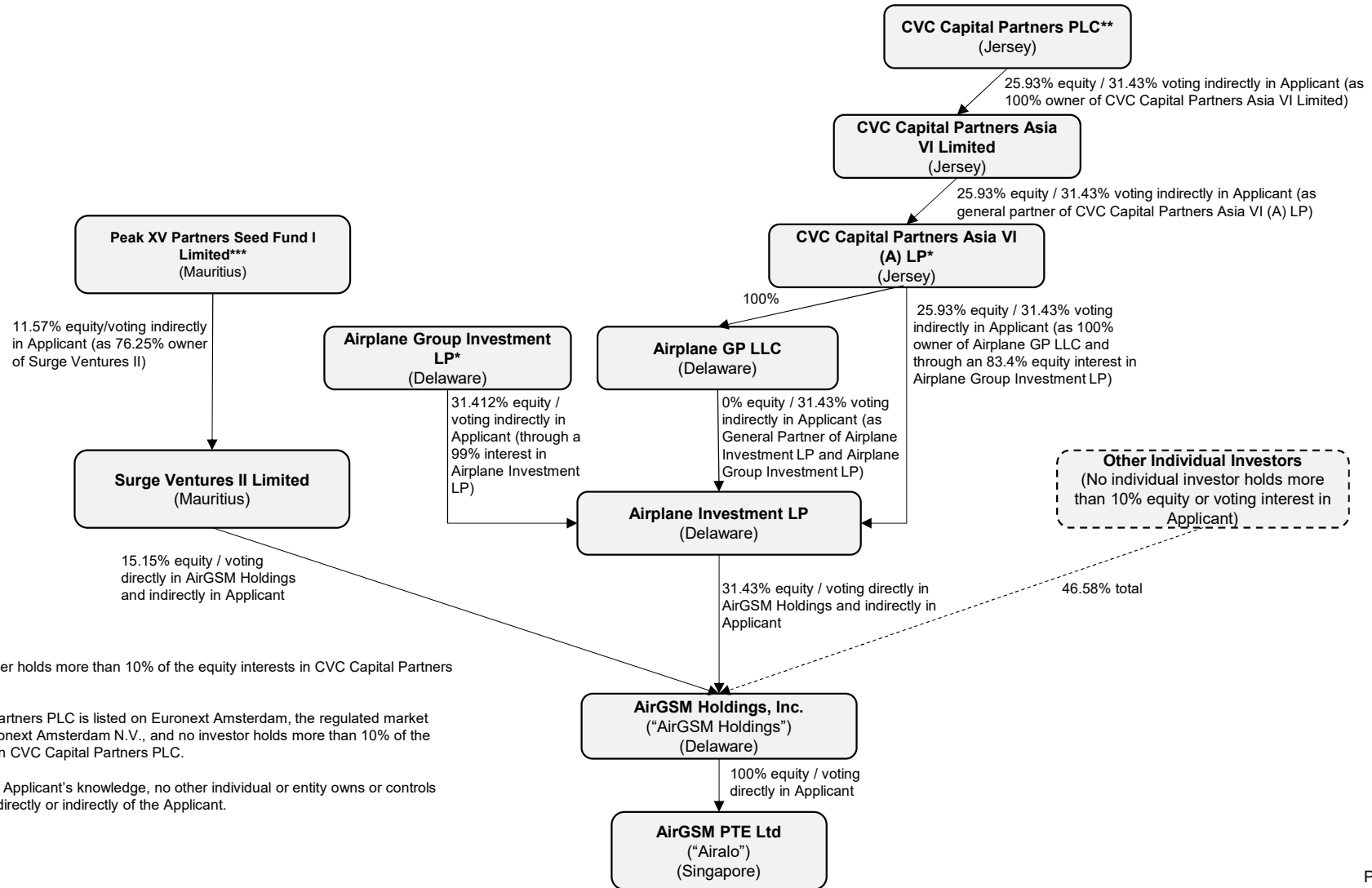
Danielle Burt
Leetal Weiss
Connor Haffey
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, N.W.
Washington, DC 20004
Tel: (202) 739-3000
Fax: (202) 739-3001
Email: danielle.burt@morganlewis.com
leetal.weiss@morganlewis.com
connor.haffey@morganlewis.com

Counsel for AirGSM Pte Ltd d/b/a Airalo

July 24, 2026

APPENDIX A
OWNERSHIP DIAGRAM

Ownership Structure of AirGSM Pte Ltd.



*No limited partner holds more than 10% of the equity interests in CVC Capital Partners Asia VI (A) LP.

**CVC Capital Partners PLC is listed on Euronext Amsterdam, the regulated market operated by Euronext Amsterdam N.V., and no investor holds more than 10% of the equity interests in CVC Capital Partners PLC.

***To the best of Applicant's knowledge, no other individual or entity owns or controls more than 10% directly or indirectly of the Applicant.

APPENDIX B
CERTIFICATION OF APPLICANT

On behalf of AirGSM Pte Ltd d/b/a Airalo, I certify that all of the information contained in this application is true and correct to the best of my knowledge and belief.

Pursuant to 47 C.F.R. § 63.18(q), I also certify that AirGSM Pte Ltd d/b/a Airalo agrees:

1. 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 Title 47, chapter I, part 1, subpart Z;
2. 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:
 - . The Wiretap Act, 18 U.S.C. § 2510 et seq.;
 - . The Stored Communications Act, 18 U.S.C. § 2701 et seq.;
 - . The Pen Register and Trap and Trace Statute, 18 U.S.C. § 3121 et seq.; and
 - . Other court orders, subpoenas or other legal process;
2. 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;
3. That AirGSM Pte Ltd d/b/a Airalo 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 for the Assessment of Foreign Participation in the United States Telecommunications Services Sector's ("Committee") request, as required under section 1.65(a) of the Commission's rules, and to inform the Commission and the Committee of any substantial and significant changes while an application is pending;
4. That after the application is no longer pending for purposes of section 1.65 of the Commission's rules, AirGSM Pte Ltd d/b/a Airalo will 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
5. That AirGSM Pte Ltd d/b/a Airalo understands that if it fails to fulfill any of the conditions and obligations set forth in the certifications set out in section 63.18(q) of the Commission's rules 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, it 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.

I certify under penalty of perjury that the foregoing is true and correct. Executed on July 21, 2026.

Signed by:

Carolyn Jameson

C5019AC48B9148F...

Carolyn Jameson
Chief Legal Officer