

ATTACHMENT 2 – APFELSAFT LLC SECTION 214 LICENSE APPLICATION

Question 14: List of Shareholders

Apfelsaft LLC is entirely owned by George Saussy, an American citizen. He is also the sole owner of another firm, Saussy Analytics LLC, which is a New York-based software consultancy.

George Thomas Saussy
177 Thompson St 26
New York, New York
10012

Question 15: Responses to 47 CFR § 63.18

Response to 47 CFR § 63.18(d): Previous Authorization Under Section 214

Before this application, Apfelsaft LLC nor any affiliated entity have applied for section 214 authorization.

Response to 47 CFR § 63.18(e)(3): Certification of Compliance with 47 CFR § 63.21-22

Apfelsaft LLC will comply with 47 CFR § 63.21-22. In particular, Apfelsaft LLC will be only aiming to build VoIP and SIP trunking services which will required connections to the PSTN but not directly with any foreign operator. This will only require partnering with US-based common carriers, which is explicitly permitted for facilities-based international common carriers in 47 CFR § 63.22(b), provided satellite communication is not involved.

Response to 47 CFR § 63.18(e)(3): Certification that Application is not Excluded by 47 CFR § 1.306

Apfelsaft LLC is seeking to build a VoIP an SIP trunking service and therefore none of the exclusion criteria 47 CFR § 1.306 apply.