EXPLANATION OF AMENDMENT

On January 14, 2026, Link2YU Network LLC dba MTELUSA (the "Company") submitted its original application for international Section 214 authority. The Company requested (i) limited resale authority, pursuant to Rule 63.18(e)(2), to operate between the U.S. and all but three countries that are not currently members of the World Trade Organization ("WTO") and (ii) resale authority in those three non-WTO countries pursuant to Rule 63.18(e)(3). Following discussion with FCC Staff, the Company is separating these two requests. Specifically, this amendment is filed to revise the Company's original application to solely address the 63.18(e)(2) request.[1] A second application is being submitted concurrently to address the request pursuant to 63.18(e)(3).

1 The amended application also revises the details for the interests held in Telekom Srbija AD and makes certain nonmaterial edits.

ATTACHMENT 1 TO AMENDED FCC SECTION 214 APPLICATION

Introduction: Link2YU Network LLC d/b/a MTEL USA ("MTEL USA," "Applicant" or the "Company"), a California limited liability company, requests authority, pursuant to Rules 63.18(e)(2), to provide international Section 214 services on a resale basis. Applicant proposes to offer mobile voice, data, and broadband services nationwide through the resale of Commercial Mobile Radio Service (CMRS) capacity provided by unaffiliated U.S. carriers. MTEL USA will operate exclusively through resale and will not own or lease any physical telecommunications infrastructure.

The Company has a number of foreign carrier affiliates, identified in this application, three of which operate in countries that currently are not members of the WTO.[2] For this reason, pursuant to Rule 63.23(a)(1) MTEL USA requests authority (i) pursuant to Rule 63.18(e)(2), to operate between the U.S. and all international points <u>except</u> Serbia, Bosnia and Herzegovina, and Kosovo.[3] In connection with this request, MTEL USA certifies that it will comply with the terms and conditions contained in Rules 63.21 and 63.23.

Notice regarding compliance with foreign ownership review:
In response to Rule 63.18(p), Applicant has submitted responses to Standard Questions directly to the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (Committee). A complete and unredacted copy of this amended application, including the file number, is being submitted to the Committee within three business days of this filing.

In support of its request for international Section 214 resale authority, MTEL USA provides the following responses :

<u>Response to Application Item 11/11a (Ownership)</u>
Details for the entities (or individuals) that directly or indirectly hold at least 10% of the equity and/or voting interests, or a controlling interest, of the Applicant:

Interest Holder Name	**MTEL Global d.o.o. Beograd ("MTEL Global")**
Address	Vladmira Popovica 6, Unit B23, Beograd, 11070 Serbia
Citizenship or Country of Incorporation	Serbia
Dual or more if applicable	Not applicable
Principal Business	Telecommunications and support services, including ownership of MVNO entities
Name of entity in which interest holder has a direct 10% or more equity or voting interest	Link2YU Network LLC d/b/a MTEL USA
Direct equity interest held	100%
Direct voting interest held	100%
Resulting interests held in Applicant	100% direct equity and voting interest

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2 Serbia, Bosnia and Herzegovina, and Kosovo.

3 A separate application is being filed concurrent with this amendment to request authority to operate between the U.S. and Serbia, Bosnia and Herzegovina, and Kosovo pursuant to Rule 63.18(e)(3).

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Interest Holder Name	**Telekomunikacije Republike Srpske A.D. Banja Luka (“MTEL Banja Luka”)**
Address	Street Vuka Karadzica 2, Banja Luka, Bosnia and Herzegovina
Citizenship or Country of Incorporation	Bosnia and Herzegovina
Dual or more if applicable	Not applicable
Principal Business	Telecommunications services
Name of entity in which interest holder has a direct 10% or more equity or voting interest	MTEL Global
Direct equity interest held	41%
Direct voting interest held	41%
Resulting interests held in Applicant	41% indirect equity and voting interest
Interest Holder Name	**Telekom Srbija AD**
Address	Takovska 2, 11000 Belgrade, Serbia
Citizenship or Country of Incorporation	Serbia
Dual or more if applicable	Not applicable
Principal Business	Telecommunications services, parent company of the Telekom Srbija Group
Name of entity in which interest holder has a direct 10% or more equity or voting interest	MTEL Global and MTEL Banja Luka
Direct equity interest held	59% in MTEL Global and 65% in MTEL Banja Luka
Direct voting interest held	59% in MTEL Global and 65% in MTEL Banja Luka
Resulting interests held in Applicant	85.7% indirect equity interest; 100% indirect voting interest
Interest Holder Name	**Government of the Republic of Serbia**
Address	Nemanjina st. no. 11, 11000 Belgrade, Serbia
Citizenship or Country of Incorporation	Serbia
Dual or more if applicable	Not applicable
Principal Business	Government
Name of entity in which interest holder has a direct 10% or more equity or voting interest	Telekom Srbija AD
Direct equity interest held	58.11%
Direct voting interest held	58.11%
Resulting interests held in Applicant	49.8% indirect equity and 100% indirect voting interest

Note: 20% of the shares in Telekom Srbija AD are held as “Treasury Shares,” *i.e.*, shares that were initially authorized and which, following issuance to an external shareholder, the Company then re-acquired. These shares have not been cancelled and may be resold to a third party at any time. Under

Serbian law, identification of Telkom Srbija's ownership continues to include these Treasury Shares, with the result that the interests of other shareholders are not adjusted based upon the Company's buy-back and holding of these shares.

We respectfully note that the ownership structure described in our submission is based on information publicly available through the Central Securities Depository and Clearing House of the Republic of Serbia, which is legally mandated to maintain and publish records of the shareholding structure of Serbian joint-stock companies.

Under the Serbian Companies Act, treasury shares do not confer voting rights and are accordingly excluded when determining quorum and the majority required for resolutions at a shareholders' meeting. As a practical matter, this means that, although the holding of treasury shares by the company does not alter the formal ownership percentages of the remaining shareholders in the company's share capital, it may increase their relative voting power in the context of shareholder decision-making, as the total number of votes capable of being cast is reduced. Further, for purposes of calculating ownership and voting-right thresholds under the Serbian Capital Markets Act and the Takeover Act, the relevant percentages are determined by reference to the total number of issued voting shares, including treasury shares held by the issuer. Accordingly, the acquisition of treasury shares by the company does not, in itself, result in an increase in the percentage holding of the remaining shareholders for purposes of those rules.

> By way of illustration, if a shareholder holds 24% of the shares and the company acquires 5% of its own shares, that shareholder would still be deemed to hold 24% for the purposes of those statutes, as the calculation remains based on the total number of issued shares, including treasury shares.

<u>Response to Application Item 13 (Foreign Carrier Affiliation)</u>

A chart of Applicant's foreign carrier affiliates is provided below for reference.

Foreign Carrier	Country of Affiliation	Ownership interests that trigger affiliation	Does applicant request authority to serve this country	WTO member (Y/N)	Brief description of communications services
Telekom Srbija AD	Serbia	>25% in Applicant	Yes	No. Serbia is in the accession process	Mobile Telephony (MTS): 2G/3G/4G/5G services. Fixed Telephony: Traditional fixed lines Fixed/Mobile Internet: DSL, Fiber (FTTx), and mobile broadband.

ATTACHMENT 1 TO AMENDED FCC SECTION 214 APPLICATION

Foreign Carrier	Country of Affiliation	Ownership interests that trigger affiliation	Does applicant request authority to serve this country	WTO member (Y/N)	Brief description of communications services
Telekomunikacije Republike Srpske A.D. Banja Luka	Bosnia and Herzegovina	>25% in Applicant	Yes	No. Bosnia and Herzegovina is in the accession process	Mobile Telephony: Voice and data services. Fixed Telephony: Traditional and VoIP fixed lines. Fixed/Mobile Internet: Fiber, xDSL, and mobile broadband.
Blicnet d.o.o. Banja Luka	Bosnia and Herzegovina	>25% common ownership	Yes	No. Bosnia and Herzegovina is in the accession process	Mobile Telephony: Voice and data services. Fixed Telephony: Traditional and VoIP fixed lines.
LOGOSOFT d.o.o. Sarajevo	Bosnia and Herzegovina	>25% common ownership	Yes	No. Bosnia and Herzegovina is in the accession process	Mobile Telephony: Voice and data services. Fixed Telephony: Traditional and VoIP fixed lines.
Mtel d.o.o. Podgorica	Montenegro	>25% common ownership	Yes	Yes	Mobile Telephony: Voice and data services. Fixed Telephony: Fixed lines (VoIP). Fixed/Mobile Internet: Fiber and mobile broadband.
MTEL Austria GmbH	Austria	>25% common ownership	Yes	Yes	Mobile Telephony: Voice, SMS, and data plans.
MTEL Deutschland GmbH	Germany	>25% common ownership	Yes	Yes	Mobile Telephony: Voice, SMS, and data plans.
MTEL Schweiz GmbH	Switzerland	>25% common ownership	Yes	Yes	Mobile Telephony: Voice, SMS, and data plans.
MTS d.o.o.	Kosovo	>25% common ownership	Yes	No	Mobile Telephony: Voice, SMS, and data plans.
MTEL DOOEL Skopje	North Macedonia	>25% common ownership	Yes	Yes	Mobile Telephony: Voice, SMS, and data plans.

ATTACHMENT 1 TO AMENDED FCC SECTION 214 APPLICATION

Following are the information and certifications required by Section 63.18(i) through(m):

63.18(i) Applicant certifies as follows:

1) It is not a foreign carrier;
2) It is affiliated with several foreign carriers;
3) The foreign countries in which Applicant is affiliated with a foreign carrier are Montenegro, Austria, Germany, Switzerland, North Macedonia, Serbia, Bosnia and Herzegovina, and Kosovo.

63.18(j) Applicant certifies as follows:

1) It is not a foreign carrier in any country.
2) It does not control a foreign carrier in any country.
3) The Company seeks to provide international telecommunications services to destination countries (specifically Montenegro, Austria, Germany, Switzerland, and North Macedonia) in which entities that own more than 25 percent of the applicant, or that control the applicant, control a foreign carrier in that country.
4) The Company does not seek to provide international telecommunications services to destination countries in which two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of the applicant and are parties to, or the beneficiaries of, a contractual relation (e.g., a joint venture or market alliance) affecting the provision or marketing of international basic telecommunications services in the United States.

63.18(k): The countries that Applicant has identified in response to Rule 63.18(j), above are members of the World Trade Organization ("WTO").

63.18(l) [Reserved – not in use at this time]

63.18(m): MTEL USA qualifies for non-dominant classification on all routes for which authority is requested in this application, pursuant to 63.10(a)(4), which states that a carrier that "*provides such service solely through the resale of an unaffiliated U.S. facilities-based carrier's international switched services (either directly or indirectly through the resale of another U.S. resale carrier's international switched services), shall presumptively be classified as non-dominant for the provision of the authorized service*." The Company requests international Section 214 authority solely on a resale basis and does not propose to resell the international switched services of an affiliated U.S. facilities-based carrier. (Indeed, the Company does not have any affiliations with U.S. facilities-based carriers.)

As explained in this application, MTEL USA is affiliated with several foreign carriers. (See response, above, to 13.) Among those are a few affiliates with a significant market presence in their respective countries; however, as contemplated by 63.10(a)(4) and recognized by the Commission, the Company's plan to operate solely as a reseller of unaffiliated providers' services alleviates the traditional concerns associated with such affiliations.[4] MTEL USA understands that, should it decide, in future, to resell the services of affiliated carriers or to operate on a facilities basis, the Company will be required to notify the Commission so that its classification as non-dominant can be reviewed.

Response to Application Item 13b

See preceding response (specifically regarding 63.18(m).

Response to Application Item 13c (Requested Non-Dominant Classification)

As explained in the preceding response to 63.18(m),in this application the Applicant requests non-dominant classification on all routes where it has foreign carrier affiliates, *i.e.*, on the routes between the U.S. and Montenegro, Austria, Germany, Switzerland, and North Macedonia.

Response to Application Item 16 (Requests Pursuant to Rule 63.18(e)(3)

Not applicable. As explained above, MTEL USA's request for authority pursuant to Rule 63.18(e)(3) is being addressed in a separate application.

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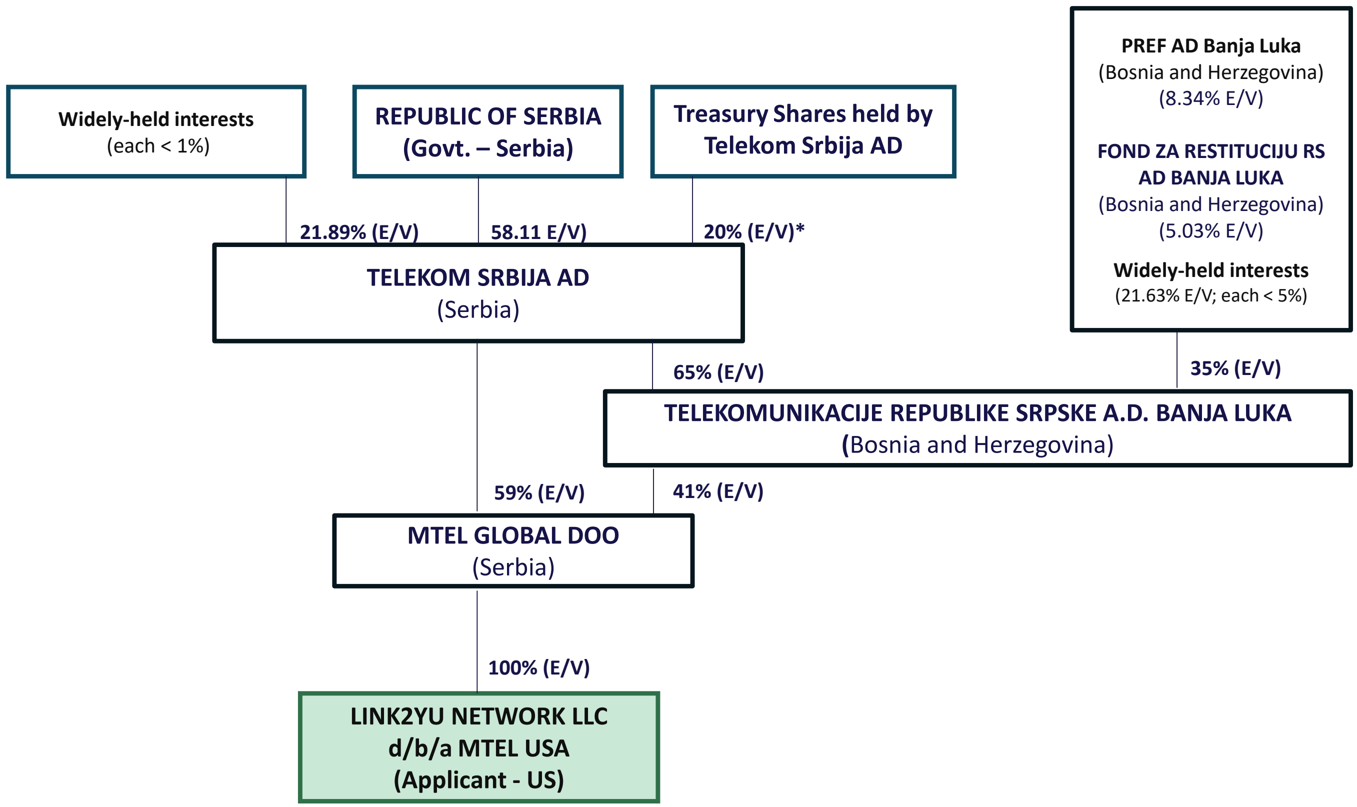
[4] *See, e.g.*, *Review of International Section 214 Authorizations to Assess Evolving National Security, Law Enforcement, Foreign Policy, and Trade Policy Risks*, FCC 23-28, Order and Notice of Proposed Rulemaking at n. 69: "Under the Commission's rules, a carrier is classified as non-dominant on a U.S.-international route if it is not affiliated with a foreign carrier with market power on the foreign end of the route or it provides an international switched service on that route solely through the resale of an unaffiliated U.S. facilities-based carrier's international switched services". . . "Except as provided in paragraph (a)(4) of this section, a U.S. carrier that is, or that has or acquires an affiliation with a foreign carrier that is a monopoly provider of communications services in a relevant market in a destination country shall presumptively be classified as dominant for the provision of international communications services on that route . . . .". (emphasis added; citations omitted).

Ownership Interests Chart for
LINK2YU NETWORK LLC d/b/a MTEL USA
(E: Equity Interest; V: Voting Interest)

(June 2026)



*** Note:** 20% of the shares in Telekom Srbija AD are held as "Treasury Shares," *i.e.*, shares that were initially authorized and which, following issuance to an external shareholder, the Company then re-acquired. These shares have not been cancelled and may be resold to a third party at any time. Under Serbian law, identification of Telkom Srbija's ownership continues to include these Treasury Shares, with the result that the interests of other shareholders are not adjusted based upon the Company's buy-back and holding of these shares.