

SUMMARY UNDER REGULATION 13(1B)

Following is the summary of the combination, not containing any confidential information, containing any confidential information, in not more than 500 words, comprising details regarding: (a) name of the parties to the combination; (b) the type of the combination; (c) the area of activity of the parties to the combination; and (d) the relevant market(s) to which the combination relates,

A. The name of the Parties to the combination

1. The names of the parties to the Proposed Transaction are set out below:
 - a. ATC Asia Pacific Pte. Ltd (“**ATC APP**”); and
 - b. Viom Networks Limited (“**Viom**”).

B. The type of combination

2. The Proposed Transaction is a composite combination under Section 5 of the Competition Act, 2002 (“**Competition Act**”) and involves—
 - a. the acquisition of a 51% stake in the equity share capital of Viom by ATC APP; and
 - b. subsequently, the combination of the business and operations of certain ATC APP affiliate entities in India

("**ATC India Entities**") with the business and operations of Viom, by way of a merger or otherwise.

C. The area of activity of the parties to the combination

3. ATC APP is an indirect wholly owned subsidiary of American Tower Corporation (US) ("**ATC**"). ATC's primary business is providing wireless and broadcast towers, in building and outdoor DAS, other right of way options, small cell and Wi-Fi networks, managed rooftops and services that speed network deployment for the wireless and broadcast communications industry. In India, ATC manages rooftops and communications sites for property owners, through the ATC India entities, which have operated as one enterprise engaged in the business of owning, operating, leasing and maintaining towers and installing and operating distributed antenna systems ("**DAS**").

Viom

4. Viom owns or operates over 42,000 towers throughout India. Viom's portfolio consists of self-supporting latticed towers, monopoles and rapid deployment towers (cell-on-wheel). Viom is also active in the market for IBS, DAS and as neutral host providing passive infrastructure for Wi-Fi services by telecom operators.

D. The relevant markets to which the combination relates

5. The relevant product market for the purposes of the Proposed Transaction is the *market for provision of passive infrastructure services* (to various telecom operators).
6. The relevant geographic market for the purposes of the Proposed Transaction should be considered on a national basis, i.e., pan India, because the conditions for supply of these services are uniform across India. The same players are active in most parts of India, and service the same customers in most parts of the country.
7. However, with a view to assist the Hon'ble Commission, the Parties have also provided the same information on a circle-wise basis, for the circles in which the Parties activities overlap in India namely, Delhi NCR, Mumbai, Maharashtra & Goa, Gujarat, Andhra Pradesh, Karnataka, Tamil Nadu & Chennai, Kerala, Punjab, Haryana, Uttar Pradesh West, Uttar Pradesh East, Rajasthan, Madhya Pradesh & Chhattisgarh, West Bengal & Kolkata, Himachal Pradesh, Bihar & Jharkhand, Orissa, All North East and Jammu & Kashmir.
