Primo Communications Inc. Attachment 1 Response to Question 9 Section 214 Application

- (1) Primo Communications Inc. certifies that it is not affiliated with any foreign-based carrier in a destination market.
- (2) Primo Communications Inc. certifies that it is not affiliated with a dominant U.S. carrier whose international switched or private line services the applicant seeks authority to resell (either directly or indirectly through the resale of another reseller's services).
- (3) Primo Communications Inc. certifies that it does not seek authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines; or
- (e) One or more of the following statements, as pertinent:
 - (1) Global Facilities-Based Authority. If applying for authority to become a facilities-based international common carrier subject to § 63.22, the applicant shall:
 - (i) State that it is requesting Section 214 authority to operate as a facilities-based carrier pursuant to § 63.18(e)(1) of the Commission's rules;
 - (ii) List any countries for which the applicant does not request authorization under this paragraph (see § 63.22(a)); and
 - (iii) Certify that it will comply with the terms and conditions contained in §§ 63.21 and 63.22.
 - (2) Global Resale Authority. If applying for authority to resell the international services of authorized U.S. common carriers subject to § 63.23, the applicant shall:
 - (i) State that it is requesting Section 214 authority to operate as a resale carrier pursuant to § 63.18(e)(2) of the Commission's rules;
 - (ii) List any countries for which the applicant does not request authorization under this paragraph (see § 63.23(a)); and
 - (iii) Certify that it will comply with the terms and conditions contained in §§ 63.21 and 63.23.
 - (3) Transfer of Control or Assignment. If applying for authority to transfer control of a common carrier holding international Section 214 authorization or to acquire, by assignment, another carrier's existing international Section 214 authorization, the applicant shall complete paragraphs (a) through (d) of this section for both the transferor/assignor and the transferee/assignee. Only the transferee/assignee needs to complete paragraphs (h) through (p) of this section. At the beginning of the application, the applicant should also include a narrative of the means by which the transfer or assignment will take place. The Commission reserves the right to request additional information as to the particulars of the transaction to aid it in making its public interest determination. An assignee or transferee shall notify the Commission no later than 30 days after either consummation of the assignment or transfer or a decision not to consummate the assignment or transfer. The notification may be by letter and shall identify the file numbers under which the initial authorization and the authorization of the assignment or transfer were granted. In the event the transaction requiring a transfer of control or assignment application also requires the filing of a foreign carrier affiliation notification pursuant to § 63.11, the applicant shall reference in the application the foreign carrier affiliation notification and the date of its filing. See § 63.11. See also §63.24 (pro forma assignments and transfers of control).
 - (4) Other Authorizations. If applying for authority to acquire facilities or to provide services

not covered by paragraphs (e)(1) through (e)(3), the applicant shall provide a description of the facilities and services for which it seeks authorization. The applicant shall certify that it will comply with the terms and conditions contained in \S 63.21 and \S 63.22 and/or \S 63.23, as appropriate. Such description also shall include any additional information the Commission shall have specified previously in an order, public notice or other official action as necessary for authorization.