

**HARLAN MUNICIPAL UTILITIES**  
**International Section 214 Application for Streamlined Global Resale Authority**

**RESPONSES TO QUESTIONS 9, 10, 11 AND 12**

Response to Question 9: Qualification for Streamlined Processing

Harlan Municipal Utilities qualifies for streamlined processing pursuant to Section 63.12 of the Commission's Rules because: (a) Harlan Municipal Utilities is not affiliated with any foreign carrier in any destination market; (b) Harlan Municipal Utilities is not affiliated with any dominant U.S. carrier whose international switched or private line services Harlan Municipal Utilities seeks authority to resell; (c) Harlan Municipal Utilities does not seek authority to provide switched basic services over private lines to any country (much less, to any country for which the Commission has not previously authorized the provision of switched services over private lines); and (d) Harlan Municipal Utilities has no reason to believe that the Commission will inform it in writing that this application is not eligible for streamlined processing.

Response to Question 10: Not Providing Services Over Private Lines

Harlan Municipal Utilities is not applying for authority to provide switched services over private lines.

Response to Question 11: Applicant Not Foreign Carrier or Affiliated with Foreign Carrier

Harlan Municipal Utilities certifies that it is not a foreign carrier, and that it is not affiliated with any foreign carrier.

Response to Question 12: No Service to Restricted Destinations

Harlan Municipal Utilities certifies that it will not provide international telecommunications services to any destination country: (a) in which Harlan Municipal Utilities is a foreign carrier; (b) in which Harlan Municipal Utilities controls a foreign carrier; (c) in which an entity that owns more than 25 percent of Harlan Municipal Utilities, or controls Harlan Municipal Utilities, controls a foreign carrier; or (d) in which two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of Harlan Municipal Utilities and are parties to, or the beneficiaries of, a contractual relation affecting the provision or marketing of international basic telecommunications services in the United States.