

Question 9:

Motion Telecom International, LLC (“MTI”) desires streamlined processing pursuant to Section 63.12 of the Commission's rules. MTI qualifies for streamlined processing under Section 63.12(c)(1)(ii) because although MTI is affiliated with a foreign carrier in a destination market, MTI qualifies for a presumption of non-dominance under Section 63.10(a)(3). As more fully described in response to Question 11 below, MTI qualifies for a presumption of non-dominance under Section 63.10(a)(3) because the foreign carrier with which MTI is affiliated is not a monopoly provider and does not have more than 50% of the market share for international transport or local access on the foreign end of the relevant routes.

The other restrictions set forth in Section 63.12(c) of the Commission's rules do not apply. MTI does not have an affiliation with a dominant U.S. carrier whose international switched or private line services the applicant seeks authority to resell. And MTI 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.

Question 11:

63.18(i) – MTI hereby certifies that it is affiliated with Motion Cards Hong Kong (“MCHK”), a limited company formed under the laws of Hong Kong, because the owner of MTI has a controlling interest in MCHK. MTI hereby certifies that it is affiliated with Motion Cards Singapore (“MCS”), a limited company formed under the laws of Singapore, because the owner of MTI has a controlling interest in MCS.

63.18(j) – MTI hereby certifies that it seeks to provide international telecommunications services to Hong Kong and Singapore, where its foreign carrier affiliates MCHK and MCS are licensed to provide telecommunications services.

63.18(k) – Hong Kong and Singapore are members of the WTO. In addition, MCHK lacks market power in Hong Kong, and MCS lacks market power in Singapore. MCHK and MCS have less than 1% of the market for telecommunications services and access lines in Hong Kong and Singapore.

63.18(l) – MTI desires the authority to resell the international switched services of an unaffiliated U.S. carrier on the routes to Hong Kong and Singapore. Accordingly, pursuant to Section 63.10(a)(3), MTI hereby certifies that MCHK is not a monopoly provider in Hong Kong and MCS is not a monopoly power in

Singapore. MTI further submits the following information to demonstrate that MCHK and MCS do not have sufficient market power on the foreign end of the routes to the countries specified above to adversely affect competition in the U.S. market: MCHK has less than 1% of the market for telecommunications services and access lines in Hong Kong. MCS has less than 1% of the market for telecommunications services and access lines in Singapore.

63.18(m) – MTI desires to be classified as non-dominant. MTI submits that the information set forth above for Section 63.18(l) demonstrates that it is presumptively non-dominant under Section 63.10(a)(3) of the Commission's Rules.

Question 12:

As described above, MTI desires to be authorized to provide international telecommunications services to, among other countries, Hong Kong and Singapore, where it has foreign carrier affiliations as described above.

Question 15:

- (d) MTI has not received authority previously under Section 214 of the Communications Act.
- (e) MTI certifies that it will comply with the terms and conditions contained in sections 63.21, 63.22 and 63.23 of the Commission's rules.
- (f) At this time, MTI seeks no other authorization available under Section 63.18(e).
- (g) Not applicable.