#### **ATTACHMENT 1**

# Answer to Question 9

IDT Telecom, Inc. requests streamlined processing pursuant to 47 C.F.R. Section 63.12. IDT Telecom, Inc. qualifies for streamlined processing because: (1) although it is affiliated with a foreign carrier in a destination market, it qualifies for a presumption of non-dominance under § 63.10(a)(3) and the affiliated destination market is a WTO Member country and IDT Telecom, Inc. qualifies for a presumption of non-dominance under § 63.10(a)(4); (2) it does not have affiliation with a dominant U.S. carrier whose international switched or private line services IDT Telecom, Inc. seeks authority to resell (either directly or indirectly through the resale of another reseller's services); and (3) 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.

#### Answer to Question 10

Not applicable.

## Answer to Question 11

Pursuant to 47 CFR Section 63.18(i), IDT Telecom, Inc. certifies that it is affiliated with foreign carriers. The foreign countries in which IDT Telecom, Inc. is affiliated with a foreign carrier are: Argentina, Australia, Austria, Belgium, Brazil, Canada, Chile, Denmark, France, Germany, Greece, Hong Kong, Ireland, Italy, Japan, Luxembourg, the Netherlands, Norway, Peru, Portugal, Singapore, Spain, Sweden, Switzerland, the United Kingdom and Uruguay.

Pursuant to 47 CFR Section 63.18(j), IDT Telecom, Inc. certifies that it seeks to provide international telecommunications services to: Argentina, Australia, Austria, Belgium, Brazil, Canada, Chile, Denmark, France, Germany, Greece, Hong Kong, Ireland, Italy, Japan, Luxembourg, the Netherlands, Norway, Peru, Portugal, Singapore, Spain, Sweden, Switzerland, the United Kingdom and Uruguay. In the aforementioned countries, IDT Telecom, Inc. controls a foreign carrier. Specifically, the foreign countries and carriers are:

<u>Country</u>	Carrier
Argentina	IDT Corporation Argentina S.A.
Australia	IDT Telecom Asia Pacific (Australia) Pty Ltd.
Austria	InterDirect Tel Ltd.
Belgium	Expercom NV & Interdirect Tel Ltd.
Brazil	IDT Brazil Telecomunicacoes LTDA
Canada	IDT Telecom Canada, Inc.
Chile	IDT Chile SA
Denmark	Interdirect Tel Ltd
France	IDT France SARL & Interdirect Tel Ltd.
Germany	IDT Germany GmbH and Interdirect Tel Ltd.

Greece IDT Hellas Telecoms EPE & Interdirect Tel Ltd.

Hong Kong IDT Telecom Asia Pacific Ltd.

Ireland Interdirect Tel Ltd.

Italy IDT Italia SRL & Interdirect Tel Ltd.

Japan IDT Telecom Asia Pacific KK

Luxembourg Expercom NV

The Netherlands IDT Netherlands BV & Interdirect Tel Ltd.

Norway Interdirect Tel Ltd.
Peru IDT Peru S.R.L.
Portugal Interdirect Tel Ltd.

Singapore IDT Telecom Asia Pacific Ltd.
Spain IDT Spain SL & Interdirect Tel Ltd.

Sweden IDT Direct Holdings BV & Interdirect Tel Ltd.

Switzerland Interdirect Tel Ltd.
United Kingdom IDT Global Ltd.
Uruguay Dofitel SA

Pursuant to 47 CFR Section 63.18(k), IDT Telecom, Inc. hereby affirms that the following countries are Members of the World Trade Organization: Argentina, Australia, Austria, Belgium, Brazil, Canada, Chile, Denmark, France, Germany, Greece, Hong Kong, Ireland, Italy, Japan, Luxembourg, the Netherlands, Norway, Peru, Portugal, Singapore, Spain, Sweden, Switzerland, the United Kingdom and Uruguay. A list of all Members of the World Trade Organization is found on the following website: http://www.wto.org/english/theWTO e/whatis e/tif e/org6 e.htm.

Pursuant to 47 CFR Section 63.18(l), IDT Telecom, Inc. hereby states that it proposes to resell the international switched services of an unaffiliated U.S. carrier for the purpose of providing international telecommunications services to the above-listed countries where it is affiliated with a foreign carrier.

IDT affirms that all foreign IDT Telecom, Inc. affiliates listed above lack 50 percent market share in the international transport and the local access markets on the foreign end of their applicable routes. This is demonstrated by the fact that none of the foreign IDT Telecom, Inc. affiliates are considered "Carriers Presumed to Possess Market Power" - <a href="http://hraunfoss.fcc.gov/edocs\_public/attachmatch/DA-07-233A1.pdf">http://hraunfoss.fcc.gov/edocs\_public/attachmatch/DA-07-233A1.pdf</a>. Accordingly, IDT Telecom, Inc. is non-dominant on each of the aforementioned routes. Additionally, IDT Telecom, Inc. is not required by 47 § 43.61(c) to file the quarterly traffic reports.

Pursuant to 47 CFR Section 63.18(m), IDT Telecom, Inc. hereby states that it desires to be regulated as non-dominant for the provision of particular international telecommunications services to all the countries listed above. IDT Telecom, Inc. demonstrates that it qualifies for non-dominant classification pursuant to 47 § 63.10 by virtue of the fact that all foreign IDT Telecom, Inc. affiliates listed above lack 50 percent market share in the international transport and the local access markets on the foreign end of the route. This is demonstrated by the fact that none of the foreign IDT Telecom, Inc.

affiliates are considered "Carriers Presumed to Possess Market Power" - <a href="http://hraunfoss.fcc.gov/edocs\_public/attachmatch/DA-07-233A1.pdf">http://hraunfoss.fcc.gov/edocs\_public/attachmatch/DA-07-233A1.pdf</a>. Accordingly, IDT Telecom, Inc. is non-dominant on each of the aforementioned routes.

## Answer to Question 12

IDT Telecom, Inc. seeks authority to provide service to destinations where it controls a foreign carrier in the following countries: Argentina, Australia, Austria, Belgium, Brazil, Canada, Chile, Denmark, France, Germany, Greece, Hong Kong, Ireland, Italy, Japan, Luxembourg, the Netherlands, Norway, Peru, Portugal, Singapore, Spain, Sweden, Switzerland, the United Kingdom and Uruguay.

## Answer to Question 13

IDT Telecom, Inc. does not seek authority to provide service to any destinations other than those listed in response to question 12 where it has an affiliation with a foreign carrier.