

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the matter of )  
)  
KVH Services LLC )  
)  
Application for Authority ) File No. \_\_\_\_\_  
Under Section 214 of the )  
Communications Act of 1934, as amended, )  
for Global Authority to Operate as an )  
International Resale Carrier )

**ATTACHMENT 1**

**Response to Question 9**

- (p) KVH requests streamlined processing of this Application under Section 63.12 of the Commission’s Rules. 47 C.F.R. § 63.12. This Application qualifies for streamlined processing for the following reasons: (1) Although the Applicant is affiliated with a foreign carrier in the destination markets, KVH qualifies for a presumption of non-dominance under Section 63.10(a)(3). (2) KVH is not affiliated with any dominant U.S. carrier whose international switched or private lines services it seeks to resell. (3) KVH is not requesting authority to provide switched service over private lines to countries not previously authorized for service by the Commission.

**Response to Question 11**

- (i) Through its direct parent company, KVH Co., Ltd., a Japanese company, KVH is affiliated with foreign carriers in Japan (KVH Co., Ltd., the 100% owner of KVH) and Singapore (KVH (Singapore) Pte. Ltd., which is 100% owned by KVH Co., Ltd. Through one of its indirect parent companies, FMR LLC (a Delaware limited liability company), KVH is affiliated with COLT Telecom Group S.A. (“COLT”), a Luxembourg holding company of operating foreign carrier entities in several European countries, namely the United Kingdom, Germany, France, Switzerland, Italy, Spain, The Netherlands, Belgium, Austria, Sweden, Denmark, Norway, Portugal, Ireland and Finland. FMR LLC owns approximately 35% of the equity of COLT.
- (j) KVH certifies it seeks to provide international telecommunications services to between the United States and all international points, including Japan, the United Kingdom, Germany, France, Switzerland, Italy, Spain, The Netherlands, Belgium, Austria, Sweden, Denmark, Norway, Portugal, Ireland and Finland.

- (k) Japan, the United Kingdom, Germany, France, Switzerland, Italy, Spain, The Netherlands, Belgium, Austria, Sweden, Denmark, Norway, Portugal, Ireland and Finland are all Members of the World Trade Organization.
- (l) KVH submits that under Section 63.10(a)(3), 47 C.F.R. § 63.10(a)(3), none of its affiliated foreign carriers have market power in any of the countries in which they operate.
- (m) KVH and its foreign carrier affiliates are new market entrants without market power in all countries in which they operate. As such, KVH qualifies for non-dominant regulation for the provision of international telecommunications services to the countries in which it and its foreign carrier affiliates operate.

### **Response to Question 12**

- (j) KVH certifies it seeks authority to provide international telecommunications services between the United States and all international points, including the countries in which it has a foreign affiliation (i.e., Japan, United Kingdom, Germany, France, Switzerland, Italy, Spain, The Netherlands, Belgium, Austria, Sweden, Denmark, Norway, Portugal, Ireland and Finland).