

ATTACHMENT 1

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

In the Matter of: )  
**G3 Telecom USA, Inc.** )  
Application Under Section )  
214 of the Communications Act of 1934, )  
As Amended, for Global Authority For the Provision ) File No. \_\_\_\_\_  
Of Resold and International )  
Switched Services Between the U.S. and Various )  
International Points )

**G3 Telecom USA, Inc. attests to its qualification for streamlined processing under 63.12 as follows:**

G3 Telecom USA, Inc. ("Applicant") is not a foreign carrier; however, it is affiliated with a foreign carrier in a destination market (Canada). Applicant nevertheless qualifies for streamlined processing pursuant to 47 CFR §63.12(c)(1)(iii), based on the following:

(a) The Applicant is affiliated with G3 Telecom Corp., a Canadian corporation. Both the Applicant and G3 Telecom Corp. are wholly owned by Suraj Holdings, a Canadian company. G3 Telecom Corp. is authorized in Canada to provide long distance telecommunications services, including international services, to the public. However, G3 Telecom Corp. owns no facilities, as that term is defined in §63.12(c)(1)(iii).

(b) The Applicant does not have an affiliation with a dominant U.S. carrier whose international switched or private line services G3 Telecom USA, Inc. seeks authority to resell.

**G3 Telecom USA, Inc. responds to Question 12 of the Application and §63.18 (i), (j) (k), (l) and (m) as follows:**

(i) G3 Telecom USA, Inc. is affiliated with a foreign carrier, G3 Telecom Corp., which is authorized to provide telecommunications service in Canada.

(j) G3 Telecom USA, Inc. seeks to provide international telecommunications services to Canada. It is affiliated with G3 Telecom Corp., a Canadian company, which shares common ownership with the Applicant.

(k)(1) Canada is a member of the World Trade Organization.

(l)  
**and**

(m) Applicant satisfies the requirements of §63.10(a)(3) for a presumption of non-dominance and therefore qualifies for regulation as a non-dominant carrier for the provision of international telecommunication service to Canada. G3 Telecom Corp., the Applicant's affiliate, lacks sufficient market power in Canada to adversely affect competition in the U.S. market. As noted above, G3 Telecom Corp. owns no telecommunications facilities, other than switches. Further, it does not provide local access services. Accordingly, G3 Telecom Corp. has 0% share of the international transport and local access markets in Canada. Accordingly, G3 Telecom USA, Inc. meets the

standard for presumptive classification as non-dominant under §63.10(a)(3).

**G3 Telecom USA, Inc. will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.F.R. 63.21-63.23.**