

ATTACHMENT 1  
TO  
APPLICATION OF ROMAN LD, INC. FOR GLOBAL FACILITIES-BASED AND  
RESOLD AUTHORITY TO PROVIDE TELECOMMUNICATIONS SERVICES TO  
ALL PERMISSIBLE INTERNATIONAL POINTS PURSUANT TO SECTION 214 OF  
THE COMMUNICATIONS ACT OF 1934, AS AMENDED

**RESPONSE TO QUESTION 9:**

The instant Application is subject to the Commission's streamlined processing rules. The Applicant is a non-dominant carrier which qualifies for non-dominant regulation pursuant to § 63.12, 47 C.F.R. § 63.12. Applicant is not affiliated with a foreign carrier within the meaning of § 63.18(h)(1)(i) in a destination market for its facilities-based or resold services. Furthermore, Applicant is not affiliated with any U.S. Carrier whose facilities-based services it proposes to resell.

**RESPONSE TO QUESTION 10:**

Applicant is not applying for authority to provide switched services over private lines.

**RESPONSE TO QUESTION 11:**

Applicant is not a foreign carrier. Applicant is not affiliated with a foreign carrier.

**RESPONSE TO QUESTION 12:**

Pursuant to Section 63.18(j) (47 C.F.R. §63.18(j)) of the Commission's rules, Applicant hereby certifies that it does *not* seek to provide international telecommunications services to any destination country for which any of the following is true:

(1) The applicant is a foreign carrier in that country (Applicant is not a foreign carrier);  
or

(2) The applicant controls a foreign carrier in that country (Applicant does not control a foreign carrier); or

(3) Any entity that owns more than 25 percent of the applicant, or that controls the applicant, controls a foreign carrier in that country (No other entity owns or control's Applicant).

(4) Two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of the applicant and are parties to, or the beneficiaries of, a contractual relation (e.g., a joint venture or market alliance) affecting the provision or marketing of international basic telecommunications services in the United States (No other entity owns or controls Applicant nor are any other entities the beneficiaries of, or maintain a contractual relation (e.g., a joint venture or market alliance) affecting the provision or marketing of international basic telecommunications services in the United States).

**RESPONSE TO QUESTION 13:**

Applicant does *not* have an affiliation with any foreign carrier, as stated *supra*.