

Answer to Question 9

Lycamobile USA Inc. (“Lycamobile USA”) requests streamlined processing of this Application pursuant to Section 63.12 of the Commission’s Rules, 47 C.F.R. § 63.12. This Application qualifies for streamlined treatment under Section 63.12 for the following reasons.

Lycamobile USA is affiliated with the foreign carriers listed in Annex A (“Lycamobile Foreign Carrier Affiliates”). The Lycamobile Foreign Carrier Affiliates provide prepaid national and international telecommunications services on a resale basis in the countries shown in Annex A. No Lycamobile Foreign Carrier Affiliate has market power in the country or countries in which it provides service, as no Lycamobile Foreign Carrier Affiliate has a 50 percent market share in the international transport and the local access markets in any country. As such, Lycamobile USA qualifies for a presumption of non-dominant treatment on these routes. On all other routes, Lycamobile USA is not a foreign carrier or affiliated with a foreign carrier. Furthermore, Lycamobile USA is not affiliated with any dominant U.S. carrier. Accordingly, Lycamobile USA qualifies for non-dominant treatment or a presumption of non-dominant treatment on all routes and this Application qualifies for streamlined processing.

Answers to Questions 11 and 12

*Section 63.18(i):* Lycamobile USA certifies that Lycamobile USA is affiliated with the Lycamobile Foreign Carrier Affiliates. The Lycamobile Foreign Carrier Affiliates are foreign carriers in the countries shown in Annex A.

*Section 63.18(j):* Lycamobile USA certifies that (i) Lycamobile USA is not a foreign carrier in any market; (ii) Lycamobile USA does not controls an entity that is a foreign carrier in any market; (iii) Allirajah Subaskaran, an individual or entity that owns more than 25 percent of Lycamobile USA or controls Lycamobile USA, also controls the foreign carriers listed in Annex A; and (iv) two or more foreign carriers (or parties that control foreign carriers) do not own, in the aggregate, more than 25 percent of Lycamobile USA and are parties to, or the beneficiaries of, a contractual relation affecting the provision or marketing or international basic telecommunications services in the United States.

*Section 63.18(k):* Australia, Austria, Belgium, Canada, Denmark, France, Germany, Greece, Ireland, Italy, the Netherlands, Norway, Poland, Portugal, Spain, Sweden, Switzerland, and the United Kingdom are members of the World Trade Organization.

*Section 63.18(l):* The Lycamobile Foreign Carrier Affiliates provide prepaid national and international telecommunications services on a resale basis in the countries shown in Annex A. No Lycamobile Foreign Carrier Affiliate has market power in the country or countries in which it provides service, as no Lycamobile Foreign Carrier Affiliate has a 50 percent market share in

the international transport and the local access markets in any country. As such, Lycamobile USA qualifies for a presumption of non-dominant treatment on these routes.

*Section 63.18(m)*: See response to Section 63.18(l).

Answers to Questions 5 and 13

Lycamobile USA seeks international Section 214 authority to provide facilities-based and resold services to all international points pursuant to Sections 63.18(e)(1) and (2) of the FCC Rules. Lycamobile USA will comply with the requirements of Sections 63.21, 63.22, and 63.23 of the FCC Rules.