

Strategies Law Group, PLLC

Layer2 Licensing, Inc.
International Section 214 Application
May 23, 2011

ATTACHMENT 1

Question #9: (Streamlined Processing - 47 C.F.R. § 63.18(p)/47 C.F.R. § 63.12) – Layer2 Licensing, Inc. (“Layer2” or “Applicant”) respectfully submits that its application for International Section 214 Authority is eligible for streamlined processing pursuant to Sections 63.12(a) and (b) of the Commission’s Rules, 47 C.F.R. § 63.12(a) & (b). Specifically:

- (i) Applicant is not affiliated with a foreign carrier.
- (ii) Applicant is not affiliated with any dominant U.S. carrier whose international switched or private line services applicant seeks authority to resell; and,
- (iii) No other part of Section 63.12(c) applies to Applicant.

Question #10 - Not Applicable. Applicant is not seeking authority to provide switched services over private lines to a country for which the Commission has not previously authorized the provision of such services.

Question #11 (Foreign Carrier Affiliation - 47 C.F.R. § 63.18(i)) - Not Applicable. Applicant is not affiliated with any foreign carrier.

Question #12 (Foreign Carrier Affiliation - 47 C.F.R. § 63.18(j))- Applicant does not seek to provide international telecommunications services to any destination where:

- (i) Applicant is a foreign carrier;
- (ii) Applicant controls a foreign carrier in that country
- (iii) Any entity that owns more than a 25% interest in Applicant, or control Applicant, controls a foreign carrier in that country; or
- (iv) Two or more parties own, in the aggregate, more than 25% of Applicant and are parties to, or the beneficiaries of, a contractual relationship that affects the provision or marketing or international basic telecommunications services in the United States.

Question #13 (Foreign Carrier Affiliation - 47 C.F.R. § 63.18(k))- Applicant does not seek to provide authority to any destination where it is affiliated with a foreign carrier. (Because Applicant is not affiliated with any foreign carrier, Sections 47 C.F.R. § 63.18(l) & (m) are not applicable to Applicant).