

**INET Communications LLC  
7 Faneuil Marketplace  
Third Floor  
Boston, MA 02109**

**Attachment 1**

**Response to Question 9, Qualification for Streamlined Processing. Section 63.18 paragraphs (k), (m) and (p); Section 63.12**

Applicant qualifies for streamlined processing and non-dominant treatment because:

- 1) It is not affiliated with a foreign carrier in a destination market. Applicant notes that one of its attributed beneficial owners is New Broadband Global S.A., a company registered in Panama, however, this company is not a foreign carrier. It is a holding company that has been created for business and contracting purposes and has no telecommunications operations, facilities or licenses in Panama or any other country;
- 2) Applicant does not have affiliation with a dominant U.S. carrier whose international switched or private line services the Applicant seeks authority to resell (either directly or indirectly through the resale of another reseller's services); and
- 3) Applicant does not seek authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines.

**Response to Question 11; paragraphs (d), (e), (g), and (i) through (n) of Section 63.18.**

**Section 63.18 paragraph (d)**

Applicant has not previously received authority under Section 214 of the Act.

**Section 63.18 paragraph (e)**

Applicant is applying for authority to operate as a global facilities-based international common carrier and as a global resale carrier, pursuant to paragraphs (e)(1) and (e)(2) of Section 63.18, and certifies that it will comply with the terms and conditions contained in Sections 63.21 and 63.22 of the Act.

**Section 63.18 paragraph (g)**

Applicant is not seeking facilities-based authority under paragraph (e)(3) of Section 63.18.

**Section 63.18 paragraph (i)**

Applicant is affiliated with New Broadband Global S.A., a Panamanian holding company, which holds an attributed beneficial fifty percent (50%) ownership interest in

Applicant. New Broadband Global S.A. is not a carrier and has no carrier licenses or facilities. As evidenced by this certification Applicant is not affiliated with a foreign carrier.

**Section 63.18 paragraph (j)**

As evidenced by this certification attached hereto Applicant does not seek to provide international telecommunications service to any destination where: (1) Applicant is a foreign carrier in that country; (2) Applicant controls a foreign carrier in that country; (3) any entity that owns more than a 25% interest in Applicant, or controls Applicant, controls a foreign carrier in that country; or (4) two or more foreign carriers 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 of international basic telecommunications services in the United States.

**Section 63.18 paragraph (k)**

Not applicable; Applicant is not affiliated or otherwise related to any foreign carrier on any of the routes which Applicant proposed to provide service in this Application.

**Section 63.18 paragraph (l)**

Not applicable; Applicant is not a foreign carrier and is not affiliated with a foreign carrier on any of the routes it proposes to resell international telecommunications service.

**Section 63.18 paragraph (m)**

Not applicable; Applicant is not affiliated with any foreign carrier on any of the routes it proposes to provide services.

**Section 63.18 paragraph (n)**

As evidenced by this certification Applicant has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future.