

ATTACHMENT 1

Application of China Mobile International (USA), Inc. for Authority to Provide International Facilities-Based and Resold Services to All International Points

Answer to Question 9:

This application qualifies for streamlined processing pursuant to Section 63.12 of the Commission's rules, 47 C.F.R. § 63.12. As further described below in response to Question 13, China Mobile International (USA) Inc. ("China Mobile USA") is affiliated with certain foreign carriers in the People's Republic of China, Hong Kong, Pakistan and the United Kingdom. Each of these countries is a member of the World Trade Organization ("WTO"). China Mobile USA's affiliates in Pakistan and the United Kingdom are presumptively non-dominant because they have far less than 50 percent market share in the international transport and local access markets in their respective countries. With regard to China and Hong Kong, China Mobile USA agrees to be classified as a dominant carrier on the U.S.-China and U.S.-Hong Kong routes pursuant to Section 63.10 of the Commission's rules, 47 C.F.R. § 63.10, without prejudice to its right to petition for reclassification at a later date.

Answer to Question 11:

China Mobile USA provides the following information and certifications as required in Section 63.18(i) through (m) of the Commission's rules, 47 C.F.R. §63.18(i)-(m):

- (i) China Mobile USA certifies that it is affiliated with foreign carriers in China, Hong Kong, Pakistan and the United Kingdom.

- (j) China Mobile USA certifies that it seeks to provide international telecommunications services to all international points (except those points on the Commission's exclusion list), including the destination countries in which it is affiliated with foreign carriers. China Mobile USA is affiliated with China Mobile Communications Corporation ("CMCC"), which through its subsidiaries provides telecommunications services in China, Hong Kong, Pakistan and the United Kingdom. Specifically, CMCC provides service in China's 31 provinces through the following subsidiaries:

- China Mobile Group Guangdong Company Limited ("Guangdong Mobile")
- China Mobile Group Zhejiang Company Limited ("Zhejiang Mobile")
- China Mobile Group Jiangsu Company Limited ("Jiangsu Mobile")
- China Mobile Group Fujian Company Limited ("Fujian Mobile")
- China Mobile Group Henan Company Limited ("Henan Mobile")
- China Mobile Group Hainan Company Limited ("Hainan Mobile")
- China Mobile Group Beijing Company Limited ("Beijing Mobile")
- China Mobile Group Shanghai Company Limited ("Shanghai Mobile")
- China Mobile Group Tianjin Company Limited ("Tianjin Mobile")

- China Mobile Group Hebei Company Limited (“Hebei Mobile”)
- China Mobile Group Liaoning Company Limited (“Liaoning Mobile”)
- China Mobile Group Shandong Company Limited (“Shandong Mobile”)
- China Mobile Group Guangxi Company Limited (“Guangxi Mobile”)
- China Mobile Group Anhui Company Limited (“Anhui Mobile”)
- China Mobile Group Jiangxi Company Limited (“Jiangxi Mobile”)
- China Mobile Group Chongqing Company Limited (“Chongqing Mobile”)
- China Mobile Group Sichuan Company Limited (“Sichuan Mobile”)
- China Mobile Group Hubei Company Limited (“Hubei Mobile”)
- China Mobile Group Hunan Company Limited (“Hunan Mobile”)
- China Mobile Group Shaanxi Company Limited (“Shaanxi Mobile”)
- China Mobile Group Shanxi Company Limited (“Shanxi Mobile”)
- China Mobile Group Neimenggu Company Limited (“Neimenggu Mobile”)
- China Mobile Group Jilin Company Limited (“Jilin Mobile”)
- China Mobile Group Heilongjiang Company Limited (“Heilongjiang Mobile”)
- China Mobile Group Guizhou Company Limited (“Guizhou Mobile”)
- China Mobile Group Yunnan Company Limited (“Yunnan Mobile”)
- China Mobile Group Xizang Company Limited (“Xizang Mobile”)
- China Mobile Group Gansu Company Limited (“Gansu Mobile”)
- China Mobile Group Qinghai Company Limited (“Qinghai Mobile”)
- China Mobile Group Ningxia Company Limited (“Ningxia Mobile”)
- China Mobile Group Xinjiang Company Limited (“Xinjiang Mobile”)

CMCC provides service in Hong Kong through its subsidiaries China Mobile Hong Kong Corporation Limited, China Mobile Hong Kong Limited, and China Mobile International Limited. In addition, CMCC provides service in Pakistan through its subsidiary China Mobile Pakistan, and in the United Kingdom through its subsidiary China Mobile International (UK) Limited.

As further explained in Attachment 2, the Chinese government indirectly holds a majority ownership interest in China Mobile USA. China United Network Communications Group Company Limited (“China Unicom”) and China Telecom Corporation Limited (“China Telecom”), which provide telecommunications services in China and Hong Kong, also are state-owned enterprises. Accordingly, China Mobile USA is indirectly affiliated with China Unicom and China Telecom.

(k) China, Hong Kong, Pakistan and the United Kingdom each is a WTO member country.

(l) The Commission recently eliminated the quarterly foreign-affiliated switched resale carrier reporting requirements of Section 43.61(c) of the Commission’s rules.¹ Accordingly, this subsection is inapplicable.

¹ See Reporting Requirements for U.S. Providers of International Telecommunications Services, Amendment of Part 43 of the FCC’s Rules, *First Report and Order and Further Notice of Proposed Rulemaking*, IB Docket No. 04-112, FCC 11-76, ¶ 23 (rel. May 13, 2011).

(m) With respect to the U.S.-Pakistan and U.S.-United Kingdom routes, China Mobile USA is presumptively non-dominant because its affiliates provide only mobile services and each has far less than 50 percent market share in the international transport and local access market in Pakistan and the United Kingdom.² China Mobile USA agrees to be regulated as dominant on the U.S.-China and U.S.-Hong Kong routes, without prejudice to its right to petition for reclassification at a later date.

Answer to Question 12:

As set forth above, China Mobile USA seeks to provide service on all of the routes set forth in response to Question 11 above.

² See, e.g., *The International Bureau Revises and Reissues the Commission's List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets*, Public Notice, DA No. 07-233 (rel. Jan. 26, 2007) (identifying Pakistan Telecommunications as the telecommunications carrier that is presumed to have market power in Pakistan and British Telecom as the telecommunications carrier that is presumed to have market power in the United Kingdom).