

ATTACHMENT 1

IP Network America LLC

Response to Question 9

Question: Does the applicant request streamlined processing pursuant to 47 C.F.R. § 63.12?

Answer: Yes, IP Network America LLC requests streamlined processing.

IP Network America LLC is eligible for streamlined processing pursuant to 47 C.F.R. § 63.12 because it meets the required conditions. It is a foreign-owned company incorporated in the United States. *See information in Attachment 2 for ownership details.* To receive streamlined processing, IP Network America LLC must demonstrate that although it is affiliated with a foreign carrier in the destination market, Mexico, it meets at least one condition of 47 C.F.R. § 63.12(c)(1).

IP Network America LLC is affiliated through common ownership with IP Network, S.A. DE C.V., located in Mexico City, Mexico. In compliance with 47 C.F.R. § 63.12(c)(1)(iii) the affiliated carrier owns no facilities in the destination market. It previously operated as a reseller of telecommunications services.

Although only one condition must be met, IP Network America LLC also qualifies for streamlined processing pursuant to 47 C.F.R. § 63.12(c)(1)(iv). Mexico is a WTO partner of the United States and IP Network America LLC qualifies for a presumption of non-dominance under 47 C.F.R. § 63.10(a)(4). It will resell international interexchange service of an unaffiliated US carrier.

Response to Question 11

Question: If applicant is affiliated with a foreign carrier, provide the information and certifications required by Section 63.18(i) through (m).

Answer: Answers and certifications are provided below.

(i): IP Network America LLC certifies that it is affiliated with a foreign carrier IP Network, S.A. DE C.V., located in Mexico City, Mexico.

(j): IP Network America LLC certifies that (1) is not a foreign carrier in Mexico; (2) does not control a foreign carrier in Mexico; (3) The entity that owns IP Network America LLC controls a foreign carrier in Mexico; (4) it is not owned by two or more foreign carriers.

(k): IP Network America LLC certifies that (1) Mexico is a member of the World Trade Organization; (2) the applicant's affiliated foreign carrier lacks market power in Mexico; (3) Mexico provides effective competitive opportunities to U.S. carriers.

(l): IP Network America LLC will sell the international switches services of an unaffiliated U.S. carrier. It complies with § 63.10(a)(3) as IP Network, S.A. DE C.V. lacks 50 percent market share in the market it serves. It is a very small reseller of international interexchange service, but intends to transition its business to the U.S. company.

(m) IP Network America LLC certifies that it meets the requirements of § 63.10(a)(3) to be classified as a non-dominant carrier. IP Network, S.A. DE C.V. provided approximately 140 million international long distance minutes in 2011. Compared to more than 12 billion total estimated international minutes sold in Mexico, it is a de minimus amount (about 1%). This business generated the equivalent of \$280,000 in 2011. The low volume of business done by IP Network, S.A. DE C.V. qualifies the U.S. affiliate for non-dominant status.