

**Global Reach Communications, Inc.
Application for International Section 214 Authority**

Attachment 1

Response to Item 9 (Rule Section 47 C.F.R. § 63.12)

This Application qualifies for streamlined processing pursuant to Section 63.12 of the Commission's rules for the following reasons: (1) Global Reach Communications, Inc. ("Global Reach") is not affiliated with a foreign carrier in a destination market; (2) Global Reach 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) Global Reach is not requesting authority to provide switched service over private lines to countries not previously authorized for service by the Commission.