

ATTACHMENT 1

Response to Question 9

- Section 63.18(p) Applicant requests and qualifies for streamlined processing pursuant to Section 63.12(c)(1)(ii) because the Applicant qualifies for a presumption of non-dominance under Section 63.10(a)(3).
- Section 63.10(a)(3) Perseus Telecom Limited, Applicant's indirect parent company, is a Section 214 authorized carrier based in Ireland.¹ Perseus Telecom Limited is not a monopoly provider of communications services in any market, including Ireland. Perseus Telecom Limited has less than fifty percent (50%) market share in the international transport and local access markets on the foreign end of the applicable U.S. international route.

Response to Questions 11 and 12

- Section 63.18(i) Applicant certifies that it is affiliated with Perseus Telecom Limited, a carrier based in Ireland.
- Section 63.18(j) Applicant certifies that it seeks to provide international, data-only (*i.e.*, no voice) telecommunications services to Ireland. An entity (Perseus Telecom Limited) which indirectly owns and controls more than 25 percent of Applicant is a Section 214 authorized carrier based in Ireland.
- Section 63.18(k) Ireland is a member of the World Trade Organization. Perseus Telecom Limited lacks market power in Ireland.
- Section 63.18(l) Applicant satisfies Section 63.10(a)(3). *See* Response to Question 9, above.
- Section 63.18(m) Applicant qualifies for non-dominant classification pursuant to Section 63.10. *See* Response to Question 9, above.

¹ Perseus Telecom Limited previously received authority under Section 214 of the Act to provide services authorized under Sections 63.18(e)(1) and 63.18(e)(2) of the Commission's rules. *See* File No. ITC-214-20100115-00020; *International Authorizations Granted*, Public Notice, Report No. TEL-01444, DA 10-1417 (rel. July 29, 2010).