

Application for Authority Under Section 214 of the Communications Act of 1934, as Amended, to Operate as a Global Facilities-Based and Resale Carrier Between the U.S. and All International Points

Attachment 1

Pursuant to Section 214 of the Communications Act of 1934, as amended, and Section 63.18 of the Commission's rules, Jajah, Inc. ("Jajah") seeks Commission consent to provide international telecommunications services on both a facilities-based and a resale basis between the United States and all international points.

Response to Question 9:

Jajah seeks streamlined processing pursuant to Section 63.12 of the Commission's rules.

Jajah is affiliated with the foreign carriers set forth in the table provided in response to Question 11, paragraph (i). All carriers in that table whose listings are not marked with an asterisk (*) qualify for a presumption of non-dominance under Section 63.10(a)(3).

With respect to all routes on which one or more of Jajah's affiliates does not qualify for a presumption of non-dominance, Jajah qualifies for streamlined processing pursuant to Section 63.12(c)(1)(v) because the destination countries all are WTO members, and Jajah agrees to be classified as a dominant carrier on these routes. Jajah reserves its right under Section 63.10(a)(3) to demonstrate at a future time that any or all of its foreign affiliates lack sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market, and that Jajah therefore qualifies for non-dominant treatment on the relevant route or routes.

Jajah qualifies for streamlined processing on all other routes because Jajah is not affiliated with any dominant U.S. carrier or with any other dominant foreign carrier. Jajah is affiliated with the foreign carriers set forth in the table provided in response to Question 11, paragraph (i). Jajah's affiliates all qualify for a presumption of non-dominance under Section 63.10(a)(3), with the exception of the following (marked with an asterisk in the table): Telefonica de Argentina, S.A., Vivo, S.A., Telefonica Brasil, S.A., Telefonica Chile, S.A., Telefonica Telecomunicaciones, S.A. ESP, Telefonica Czech Republic, a.s., Telefonica del Perú, S.A.A., and Telefónica de España S.A.U. Jajah's application therefore qualifies for streamlined processing pursuant to Section 63.12(c)(1)(ii).

Response to Question 11:

Jajah responds to the questions and certifications set forth in Section 63.18(i) through (m) of the Commission's rules as follows:

(i): Jajah certifies that it is not a foreign carrier but that it is affiliated with foreign carriers in the countries set forth in the table below.

Destination Country	Foreign Carriers Affiliates
Argentina	Telefonica Moviles Argentina, S.A.
	Telefonica de Argentina, S.A. (*)
	Telefónica International Wholesale Services Argentina S.A.
Austria	Telefonica International Wholesale Services II, S.L. Unipersonal (Austrian Branch)
Belgium	Telefonica International Wholesale Services II, S.L. Unipersonal, Succursale en Belgique
Brazil	Vivo, S.A. (*)
	Telefonica Brasil, S.A. (*)
	Telefónica International Wholesale Services Brasil Ltda.
	Telefónica International Wholesale Services Brasil Participacoes Ltda.
Bulgaria	Telefonica International Wholesale Services II, S.L. Bulgaria Branch
Chile	Telefonica Móviles Chile, S.A.
	Telefonica Chile, S.A. (*)
	Telefónica International Wholesale Services Chile S.A.
Colombia	Telefonica Móviles Colombia, S.A
	Telefonica Telecomunicaciones, S.A. ESP (*)
	Telefónica International Wholesale Services Colombia, S.A.
Costa Rica	Telefónica de Costa Rica TC, S.A.
Cyprus	Telefonica International Wholesale Services II, S.L. Unipersonal, branch in Cyprus
Czech Republic	Telefonica Czech Republic, a.s. (*)
Denmark	TIWS, filial af Telefónica International Wholesale Services II, S.L. Unipersonal, Spanien

Destination Country	Foreign Carriers Affiliates
Ecuador	Otecel, S.A.
	Telefónica International Wholesale Services Ecuador, S.A.
El Salvador	Telefónica Móviles El Salvador, S.A. de C.V.
Estonia	Telefonica International Wholesale Services II, S.L. Unipersonal Eesti filiaal
Finland	Telefónica International Wholesale Services II, S.L. Unipersonal Suomen sivuliike
France	TIWS France SAA
Germany	Telefonica Germany GmbH & Co. OHG
Greece	TIWS Greece Telecommunications Services Company Limited Liability
Guatemala	Telefónica Móviles Guatemala, S.A.
	Telefónica International Wholesale Services Guatemala, S.A.
Hungary	Telefonica International Wholesale Services Hungary Korlátolt Felelősségű Társaság
Ireland	Telefonica Ireland, Ltd.
Italy	Telefonica International Wholesale Services II, S.L. Unipersonal, filiale italiana
Latvia	Telefonica International Wholesale Services, Latvia Sabiedriba ar ierobežotu atbildību
Luxembourg	TIWS succursale Luxembourg de Telefonica International Wholesale Services II, S.L. Unipersonal
Malta	Telefonica International Wholesale Services II, Branch in Malta
Mexico	Telefonica Moviles Mexico, S.A. de C.V.
Netherlands	Telefonica International Wholesale Services II, S.L. Unipersonal, TIWS NETHERLANDS
Nicaragua	Telefónica Celular de Nicaragua, S.A.

Destination Country	Foreign Carriers Affiliates
Norway	Telefonica International Wholesale Services II, Branch in Norway
Panamá	Telefonica Móviles Panamá, S.A
Perú	Telefonica Moviles Perú, S.A.C.
	Telefonica del Perú, S.A.A. (*)
	Telefónica International Wholesale Services Perú S.A.C.
Poland	Telefónica International Wholesale Services II, S.L. Unipersonal,(Spółka z ograniczoną odpowiedzialnością) Oddział w Polsce
Portugal	Telefonica International Wholesale Services II, S.L. Unipersonal sucursal em Portugal
Romania	Telefónica International Wholesale Services II, Sociedad Limitada Unipersonal, Madrid – Sucursala Bucuresti
Slovakia	Telefonica Slovakia, s.r.o.
	Telefonica International Wholesale Services II, S.L. Unipersonal organizačná zložka
Slovenia	Telefónica International Wholesale Services II, S.L. Unipersonal, telekomunikacije, podružnica v Sloveniji
Spain	Telefónica de España S.A.U (*)
	Telefónica Móviles de España S.A.U
	Telefónica International Wholesale Services S.L.
	Telefónica International Wholesale Services II, S.L.
Sweden	Telefonica International Wholesale Services Sweden AB
Switzerland	Telefonica International Wholesale Services II, S.L. Unipersonal, Madrid, Swiss branch, Zurich
UK	Telefonica UK, Ltd.
Uruguay	Telefonica Móviles del Uruguay, S.A.

Destination Country	Foreign Carriers Affiliates
	Telefónica International Wholesale Services America S.A.
Venezuela	Telcel, C.A.

(j): Jajah certifies that it seeks to provide international telecommunications services to destinations in which Jajah's ultimate parent, Telefonica S.A., also controls a foreign carrier in the destination country. These destination countries, along with the affiliates for each country, are set forth in the table provided in response to paragraph (i).

(k): All destination countries listed in response to paragraph (j) above are Members of the World Trade Organization.¹

(l): Not applicable, given that the Commission eliminated the Quarterly Foreign-Affiliated Switched Resale Carrier Reports previously required under Section 43.61(c) of the Commission's rules.²

(m): All the foreign carriers listed in response to paragraph (i) as affiliates of Jajah, with the exception of those carriers marked with an asterisk in that list, qualify for non-dominant classification pursuant to §63.10(a)(3) because the foreign affiliate lacks 50 percent market share in the international transport and the local access markets on the foreign end of the route.

Response to Question 12:

Jajah seeks to provide international telecommunications services between the U.S. and the destinations listed in the table provided in response to paragraph (i), in which an entity that owns more than 25 percent of Jajah also owns or controls a foreign carrier in that country, as described Section 63.18(j)(3). Telefonica Europe plc holds 100 percent of Jajah. Telefonica S.A. holds 99.99% of Telefonica Europe plc and also controls the foreign carriers listed in the table provided in response to paragraph (i).

Response to Question 13:

Jajah does not seek to provide services to any destinations other than those referenced in response to Question 12 where it has an affiliation with a foreign carrier.

¹ See "Members and Observers," World Trade Organization, http://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm (last visited Nov. 2, 2012).

² See *Reporting Requirements for U.S. Providers of International Telecommunications Services*, First Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 7274, 7283 (2011).