

Question 9:

Synety Group PLC (“Synety”) desires streamlined processing pursuant to Section 63.12 of the Commission's rules. Synety qualifies for streamlined processing under Section 63.12(c)(1)(ii) because although Synety is affiliated with a foreign carrier in a destination market, Synety qualifies for a presumption of non-dominance under Section 63.10(a)(3). As more fully described in response to Question 11 below, Synety qualifies for a presumption of non-dominance under Section 63.10(a)(3) because the foreign carrier with which Synety is affiliated is not a monopoly provider and does not have more than 50% of the market share for international transport or local access on the foreign end of the relevant routes.

The other restrictions set forth in Section 63.12(c) of the Commission's rules do not apply. Synety does not have an affiliation with a dominant U.S. carrier whose international switched or private line services the applicant seeks authority to resell. And Synety does not seek authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines.

Question 11:

63.18(i) – Synety hereby certifies that it is affiliated with Synety Ltd (“Synety UK”), a corporation formed under the laws of the United Kingdom because Synety UK is 100% owned by Synety.

63.18(j) – Synety hereby certifies that it seeks to provide international telecommunications services to the United Kingdom, where its foreign carrier affiliate Synety UK provides services.

63.18(k) – The United Kingdom is a member of the WTO. In addition, Synety UK lacks market power in the UK. Synety UK has less than 1% of the market for telecommunications services and access lines in the UK.

63.18(l) – Synety desires the authority to resell the international switched services of an unaffiliated U.S. carrier on the routes to the United Kingdom. Accordingly, pursuant to Section 63.10(a)(3), Synety hereby certifies that Synety UK is not a monopoly provider in the United Kingdom. Synety further submits the following information to demonstrate that Synety UK does not have sufficient market power on the foreign end of the routes to the countries specified above to adversely affect competition in the U.S. market: Synety UK has less than 1% of the market for telecommunications services and access lines in the UK.

63.18(m) – Synety desires to be classified as non-dominant. Synety submits that the information set forth above for Section 63.18(l) demonstrates that it is presumptively non-dominant under Section 63.10(a)(3) of the Commission’s Rules.

Question 12:

As described above, Synety desires to be authorized to provide international telecommunications services to, among other countries, the UK, where it has a foreign carrier affiliation as described above.

Question 15:

- (d) Synety has not received authority previously under Section 214 of the Communications Act.
- (e) Synety certifies that it will comply with the terms and conditions contained in sections 63.21, 63.22 and 63.23 of the Commission's rules.
- (f) At this time, Synety seeks no other authorization available under Section 63.18(e).
- (g) Not applicable.