

ATTACHMENT 1

Roam Mobility USA Inc.

Response to Question 9

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

Answer: Yes, Roam Mobility USA Inc. requests streamlined processing.

Roam Mobility USA Inc. 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, Roam Mobility USA Inc. must demonstrate that it meets at least one condition of 47 C.F.R. § 63.12(c)(1).

Roam Mobility USA Inc. is affiliated through common ownership with Roam Mobility, Inc., located in Vancouver, British Columbia, Canada. In compliance with 47 C.F.R. § 63.12(c)(1)(iii) the affiliated company owns no facilities in the destination market. It previously operated as a reseller of telecommunications services.

Although only one condition must be met, Roam Mobility USA Inc. also qualifies for streamlined processing pursuant to 47 C.F.R. § 63.12(c)(1)(iv). Canada is a WTO partner of the United States and Roam Mobility USA Inc. 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): Roam Mobility USA Inc. certifies that it is not affiliated with a foreign carrier.

(j): Roam Mobility USA Inc. certifies that it (1) is not a foreign carrier in Canada; (2) does not control a foreign carrier in Canada; (3) the entity that owns Roam Mobility USA Inc. does not control a foreign carrier in Canada; (4) it is not owned by two or more foreign carriers.

(l): Roam Mobility USA Inc. will resell the international switched services of an unaffiliated U.S. carrier. It complies with § 63.10(a)(3), as Roam Mobility USA Inc. lacks 50 percent market share in the market it serves. It is a small reseller of international interexchange service.

(m) Roam Mobility USA Inc. certifies that it meets the requirements of § 63.10(a)(3) to be classified as a non-dominant carrier. Roam Mobility USA Inc.'s business generated the

equivalent of \$462,076 in 2012. The low volume of business done by Roam Mobility Inc. qualifies the U.S. affiliate for non-dominant status.

Response to Question 12

Question: Does the applicant seek authority to provide service to any destination described in paragraphs (1) through (4) of Section 63.18(j)? List them.

Answer: Answers and certifications are provided below.

No.