

ATTACHMENT 1

Application Of Mobile Financial Services, LLC For Section 214 Authority To Provide International Resold Services

Pursuant to Section 214 of the Communications Act of 1934, as amended, and Section 63.18 of the Commission's rules,¹ Mobile Financial Services, LLC ("MFS") seeks Commission consent for it to provide international telecommunications services on a resale basis between the United States and all international points (except any points on the Commission's exclusion list).²

Answer to Question 9

MFS requests streamlined processing pursuant to Section 63.12 of the Commission's rules.³ As further discussed below, MFS has a foreign carrier affiliate in the United Kingdom and the Netherlands, both of which are member countries of the World Trade Organization ("WTO"). Moreover, MFS qualifies for a presumption of non-dominance on the international routes between the United States and the United Kingdom and the Netherlands because its foreign carrier affiliate is not a monopoly provider of communications services, and it lacks 50 percent market share in the international transport and local access markets, in both the United Kingdom and the Netherlands.

Answer to Question 11

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

- (i) MFS certifies that it is not a foreign carrier, but that it is affiliated with a foreign carrier in the United Kingdom and the Netherlands.
- (j) MFS certifies that it seeks authority to provide international resale services between the United States and the foreign countries listed in subsection (i) above. MFS, through its parent company TeleWare Group Plc, is affiliated with TeleWare Mobile Ltd. ("TeleWare Mobile"), which is authorized to provide service in the United Kingdom and the Netherlands.
- (k) The United Kingdom and the Netherlands are members of the WTO. In addition, TeleWare Mobile lacks market power in both the United Kingdom and the Netherlands.

¹ 47 U.S.C. § 214; 47 C.F.R. § 63.18.

² MFS also is contemporaneously filing an application for special temporary authority to provide international telecommunications service under Section 214 of the Communications Act.

³ 47 C.F.R. § 63.12.

- (l) Not applicable.
- (m) MFS requests non-dominant status on the international routes between the United States and the United Kingdom and the Netherlands. Its affiliate, TeleWare Mobile, is not a monopoly provider of communications service in either market. TeleWare Mobile also lacks 50 percent market share in the international transport and the local access markets on the foreign end of each international route. Accordingly, pursuant to Section 63.10(a)(3), MFS is presumptively classified as non-dominant on the international routes between the United States and the United Kingdom and the Netherlands.

Response to Question 12

As noted above in response to Question 11, MFS seeks authority to provide international resale services between the United States and the United Kingdom and the Netherlands.

ATTACHMENT 2

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Answer to Question 14

Pursuant to Section 63.18(h) of the Commission's rules, the individuals and entities that directly or indirectly hold a ten percent or greater interest in Mobile Financial Services, LLC ("MFS") are as follows:

Direct Interest:

Name: TeleWare Group Plc
Address: Teleware House, Thirsk Industrial Park, York Road
Thirsk, North Yorkshire YO7 3BX
Citizenship: British
Principal Business: Telecommunications
Percent Held: 100% interest in MFS

Indirect Interest:

Name: Haworth Nominees Ltd
Address: c/o The Barker Partnership
Bank Chambers, 17 Central Buildings, Market Place
Thirsk, North Yorkshire, YO7 1HD
Citizenship: British
Principal Business: Holding company
Percent Held: 98.5% in TeleWare Group Plc

Name: Geoffrey Richard Haworth
Address: 88 Topcliffe Road, Sowerby
Thirsk, North Yorkshire, YO7 1RY
Citizenship: Bristish
Percent Held: 100% in Haworth Nominees Ltd

No other entity or individual holds a 10 percent or greater direct or indirect interest in MFS.

MFS has no interlocking directorates with foreign carriers, except interlocking directorates with companies within the TeleWare Group Plc group of companies.

Response to Question 15

MFS responds to questions set forth in Sections 63.18(d), (e)(3) and (g) of the Commission's rules as follows:

- (d) MFS has not previously received authority under Section 214 of the Communications Act.
- (e)(3) Because MFS does not seek authority to acquire facilities or to provide services that are not covered by Sections 63.18(e)(1) and 63.18(e)(2) of the Commission's rules, subsection (e)(3) is not applicable.
- (g) Because MFS does not seek facilities-based authority under Section 63.18(e)(3) of the Commission's rules, subsection (g) is not applicable.