

Vodafone Global Enterprise Inc.

ATTACHMENT 1

Answer to Question 9

Vodafone Global Enterprise Inc. (“VGEI”) requests streamlined processing of this Application pursuant to Section 63.12 of the Commission’s Rules, 47 C.F.R. § 63.12. This Application qualifies for streamlined treatment under Section 63.12 for the following reasons:

(i) VGEI is affiliated with the foreign carriers identified in response to Question 11 below. None of the foreign carrier affiliates possesses 50% market share in the international transport or local access markets in those countries except VGEI’s foreign carrier affiliate in Ghana. Accordingly, VGEI qualifies for non-dominant treatment or a presumption of non-dominant treatment, under Section 63.10(a)(3), on all routes except U.S.-Ghana and with respect to these destination countries the Application qualifies for streamlined processing pursuant to Section 63.12(c)(1)(ii).

(ii) With regard to Ghana, VGEI will be affiliated with, Ghana Telecommunications Company Ltd, the incumbent telecommunications provider in that country. Ghana is a WTO member and VGEI agrees to accept dominant carrier classification on the U.S.-Ghana route. Accordingly, with respect to Ghana, the Application qualifies for streamlined processing pursuant to Section 63.12(c)(1)(v).

Answer to Question 11

Section 63.18(i): VGEI certifies that it is not a foreign carrier. VGEI is affiliated with foreign carriers in the markets identified below.

Albania	Greece	New Zealand
Australia	Hong Kong	Portugal
Austria	Hungary	Romania
Bahrain	India	Russia
Belgium	Ireland	Singapore
Czech Republic	Italy	South Africa
Democratic Republic of Congo	Japan	Spain
Denmark	Kenya	Sweden
Egypt	Lesotho	Switzerland
Fiji	Luxembourg	Tanzania
France	Malta	Turkey
Germany	Mozambique	Ukraine
Ghana	Netherlands	United Kingdom

Section 63.18(j): VGEI is not a foreign carrier in any market and does not control an entity that is a foreign carrier in any market. VGEI certifies that it seeks to provide international telecommunications services to destination countries in which entities that own more than twenty-five percent (25%) of VGEI or control VGEI also control foreign carriers, as listed below:

Country	Carrier
Albania	Vodafone Albania Sh.A
Australia	Vodafone Hutchison Ltd
Australia	Cable & Wireless Global Business Services Pty Limited
Austria	Cable & Wireless Austria GmbH
Bahrain	Cable & Wireless Worldwide Bahrain WLL
Belgium	Cable & Wireless (Belgium) NV
Czech Republic	Vodafone Czech Republic A.S.
Democratic Republic of Congo	Vodacom Congo s.p.r.l
Denmark	Cable & Wireless Global A/S
Egypt	Vodafone Egypt Telecommunications SAE
Fiji	Vodafone Fiji Ltd
France	Cable & Wireless SAS
Germany	Vodafone GmbH
Germany	Vodafone Global Enterprise Limited
Ghana	Ghana Telecommunications Company Ltd
Greece	Vodafone Panafon Hellenic Telecommunications Company S.A.
Greece	Vodafone Global Enterprise Limited
Greece	Vodafone Global Enterprise Telecommunications (Hellas) A.E
Hong Kong	Cable & Wireless Global Network (Hong Kong) Limited
Hong Kong	Cable & Wireless Global (Hong Kong) Limited
Hungary	Vodafone Hungary Mobile Telecommunications Company Ltd
Hungary	Vodafone Global Enterprise Limited
India	Vodafone India Ltd
India	Cable & Wireless Global (India) Private Limited
India	Cable & Wireless Networks India Pvt Limited
Ireland	Vodafone Ireland Ltd
Ireland	Vodafone Global Enterprise Limited
Ireland	Cable & Wireless Global Limited
Ireland	Cable & Wireless Global Network Limited
Italy	Vodafone Omnitel NV
Italy	Vodafone Global Enterprise (Italy) S.R.L.
Italy	Cable & Wireless SpA
Japan	Vodafone Global Enterprise (Japan) K.K.
Kenya	Safaricom Ltd
Lesotho	Vodacom Lesotho Pty Ltd
Luxembourg	Cable & Wireless Luxembourg SA
Malta	Vodafone Malta Ltd

Country	Carrier
Mozambique	VM S.a.r.l
Netherlands	Vodafone Libertel B.V.
Netherlands	Vodafone Global Enterprise Limited
New Zealand	Vodafone New Zealand Ltd
Portugal	Vodafone Portugal Comunicaoes Pessoais S.A.
Romania	Vodafone Romania S.A.
Russia	Cable & Wireless CIS Svyaz
Singapore	Cable & Wireless Regional Businesses (Singapore) Pte Limited
Singapore	Cable & Wireless Worldwide (Singapore) PTE Limited
Singapore	Cable & Wireless Global Pte Limited
South Africa	Vodacom Group (Pty) Ltd
South Africa	Cable & Wireless Worldwide South Africa (Pty) Limited
Spain	Vodafone Espana S.A. U
Spain	Cable and Wireless SLU
Sweden	Cable & Wireless Sweden AB
Switzerland	Cable & Wireless Switzerland AG
Tanzania	Vodacom Tanzania Ltd
Turkey	Vodafone Telekomunikasyon A.S.
Ukraine	Cable & Wireless Ukraine Limited
United Kingdom	Energis Communications Limited
United Kingdom	Cable & Wireless Europe (UK) Limited
United Kingdom	Cable & Wireless UK Limited
United Kingdom	Apollo Submarine Cable Systems Limited
United Kingdom	Cable & Wireless Capital Limited
United Kingdom	Thus Limited
United Kingdom	Vodafone Ltd
United Kingdom	Vodafone Global Enterprise Limited

Section 63.18(k): All of the countries listed in response to section 63.18(i) above are members of the World Trade Organization.

Section 63.18(l): Not applicable.

Section 63.18(m): VGEI qualifies for non-dominant carrier status on all international routes with the exception of Ghana. Each of its foreign carrier affiliates (except in Ghana) lacks 50% market share in the fixed local access and international transport markets on the foreign end of the route. VGEI's affiliate, Ghana Telecommunications Company Ltd., is the incumbent telecommunications service provider in Ghana. Accordingly, VGEI certifies that it will comply with the dominant safeguards in Section 63.10 of the Commission's rules with respect to VGEI's provision of international service between the United States and Ghana.

Answer to Question 12

Section 63.18(j): VGEI seeks authority to provide service to all international points. This includes the countries identified in response to Question 11 above as responsive to paragraphs (1) through (4) of Section 63.18(j).

Answer to Question 13

VGEI seeks international Section 214 authority to provide facilities-based and resold services to all international points pursuant to Sections 63.18(e)(1)-(2) of the FCC Rules. VGEI will comply with the requirements of Sections 63.21, 63.22, and 63.23 of the FCC's Rules.