

ATTACHMENT 1

**Responses to Questions 9 – 12, and 15
of IBFS International Section 214 Application**

9. (§ 63.12) This Application qualifies for streamlined processing. TI Wholesale Services Puerto Rico, Inc. (“TIWS PR”) is affiliated with the foreign carriers set forth in Table A below. All carriers in that table whose listings are **not** identified with an asterisk “*” qualify for a presumption of non-dominance under Section 63.10(a)(3). As to the routes on which one or more of TIWS PR’s affiliates does not qualify for a presumption of non-dominance (i.e., Argentina, Brazil, Chile, Colombia, Perú and Spain), TIWS PR qualifies for streamlined processing pursuant to Section 63.12(c)(1)(v) because each of the destination countries is a WTO member and TIWS PR agrees to be classified as a dominant carrier on routes between the United States and Argentina, Brazil, Chile, Colombia, Perú and Spain. TIWS PR will comply with the requirements set forth in 47 C.F.R. §63.10(c) with regard to its provision of traffic on those routes. TIWS PR is entitled to non-dominant classification on all other routes. TIWS PR’s other affiliates are cellular and/or competitive carriers controlling far less than 50% of their relevant international transport and local markets. TIWS PR, therefore, qualifies for a presumption of non-dominance on these routes under 47 C.F.R. §63.10(a)(3).

10. TIWS PR certifies that all countries to which it seeks authority to provide switched basic services over authorized private lines are countries to which the Federal Communications Commission (the “FCC”) has authorized the provision of such services.

11. and 12. (§ 63.18(i)-(m)) TIWS PR certifies that it is not a foreign carrier but is affiliated with foreign carriers as indicated in Table A below. All destination countries listed in Table A are members of the World Trade Organization.¹

TIWS PR certifies that it does not seek to provide services to any country in which (1) it is a foreign carrier; (2) it controls a foreign carrier; or (3) two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25% of TIWS PR and are parties to, or the beneficiaries of, a contractual relation affecting the provision or marketing of international basic telecommunications service in the United States.

TIWS PR also certifies that it is a wholly owned indirect subsidiary of Telefónica, S.A. (“Telefónica”), which directly or indirectly controls foreign carriers or holds a 25% or greater interest in foreign carriers (as defined in Section 63.9 of the Commission's rules) in the following destination countries to which TIWS PR seeks to provide international telecommunication services.

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. 15, 2013)

Table A

Country	Affiliated Foreign Carriers
Argentina	Telefonica de Argentina, S.A.*
	Telefonica Moviles Argentina, S.A.
Brazil	Telefonica Brasil, S.A.*
Chile	Telefonica Chile, S.A.*
	Telefonica Móviles Chile, S.A.
Colombia	Colombia Telecomunicaciones, S.A. ESP*
Costa Rica	Telefónica de Costa Rica TC, S.A.
Ecuador	Otecel, S.A.
El Salvador	Telefónica Móviles El Salvador, S.A. de C.V.
Germany	Telefonica Germany GmbH & Co. OHG
Guatemala	Telefónica Móviles Guatemala, S.A.
Ireland ⁽¹⁾	Telefonica O2 Ireland, Ltd.
Mexico	Pegaso Comunicaciones y Sistemas, S.A. de C.V.
Nicaragua	Telefónica Celular de Nicaragua, S.A.
Panamá	Telefonica Móviles Panamá, S.A
Perú	Telefonica del Perú, S.A.A.*
	Telefonica Moviles Perú, S.A.C.
Spain	Telefónica de España S.A.U*
	Telefónica Móviles España S.A.U
UK	Telefonica UK, Ltd.
	Tesco Mobile Ltd.
Uruguay	Telefonica Móviles del Uruguay, S.A.
Venezuela	Telefónica Venezolana, C.A.

(1) On June 24, 2013, Telefónica reached an agreement to sell its entire shareholding in Telefonica O2 Ireland, Ltd., pending regulatory approval.

(*) Dominant carrier.

TIWS PR certifies that it is affiliated with foreign carriers as indicated in Table A above. All of these destination countries are members of the WTO. TIWS PR certifies that it will file the requisite traffic reports for all routes on which it is regulated as dominant, i.e., Argentina, Brazil, Chile, Colombia, Perú and Spain, as required by 47 C.F.R. § 43.61(c) or 43.62(c), whichever is in effect at the time. TIWS PR agrees to be classified as a dominant carrier between the United States and Argentina, Brazil, Chile, Colombia, Perú and Spain where TIWS PR is affiliated with dominant foreign carriers. TIWS PR will comply with the requirements set forth in 47 C.F.R. §63.10(c) with regard to its provision of traffic on those routes. TIWS PR is entitled to nondominant classification on all other routes. TIWS PR's other affiliates are cellular and/or competitive carriers controlling far less than 50% of their relevant international transport and local markets. TIWS PR, therefore, qualifies for a presumption of non-dominance on these routes under 47 C.F.R. §63.10(a)(3). TIWS PR is not affiliated with foreign carriers in any other destination countries, and thus qualifies for a presumption of non-dominance on all other routes. Cuba is not a destination country for purposes of this Application and TIWS PR does not seek authority herein to provide any international telecommunications services between points in the United States and Cuba.

15. (§ 63.18(d)) TIWS PR has not previously received authority under Section 214 of the Act. In this Application, TIWS PR seeks an international authorization pursuant to Section 214 of the Act to provide facilities-based and resale services between the United States and all authorized international points.

(§ 63.18(e)(3)) In this Application, TIWS PR requests global authority pursuant to 47 C.F.R. § 63.18(e)(1), (2) and (4) to provide facilities-based and resale services to all authorized international points. The proposed services will include international basic switched, non-interconnected private line, data, television and business services, using various technologies, between the United States and all authorized international points. These services will also include international basic services via private lines to authorized counties. TIWS PR certifies by signature to this Application that it will comply with the conditions contained in 47 C.F.R. §§ 63.21–63.23.

(§ 63.18(g)) TIWS PR is seeking facilities-based and resale authority under 47 C.F.R. § 63.18(e) to provide international services between the United States and all authorized international points. The grant of this Application will not constitute an action that has a significant environmental effect as defined in 47 C.F.R. § 1.1307. Accordingly, this action is categorically excluded from environmental processing under 47 C.F.R. § 1.1306, and the environmental assessment described in 47 C.F.R. § 1.1311 need not be submitted with this Application.