

Response to Question 9

Yatango Mobile USA LLC (“Yatango USA”) respectfully requests that this Application be subject to streamlined processing pursuant to Section 63.12 of the Commission’s Rules, 47 C.F.R. § 63.12. This Application qualifies for streamlined processing for the reasons set forth below.

- (1) Yatango USA is affiliated with a foreign carrier, Yatango Mobile (Australia) Pty Ltd, but (a) Yatango USA is presumptively non-dominant under 47 C.F.R. § 64.10(a)(3) as the foreign affiliate is a mobile service provider with less than 50% of the market share in the international transport and local access markets on the foreign end of the route; (b) the foreign affiliate owns no facilities in the destination market; and (c) Yatango USA qualifies for a presumption of non-dominance under 47 C.F.R. § 63.10(a)(4) as it provides its international switch service solely through the indirect resale of an unaffiliated U.S. facilities-based carrier’s (T-Mobile) services, and the destination market, Australia, is a World Trade Organization Member country.
- (2) Yatango USA is not affiliated with any dominant U.S. carrier whose international switched or private lines services it seeks to resell.
- (3) Yatango USA is not requesting authority to provide switched service over private lines to countries not previously authorized for service by the Commission.

Response to Question 10

Not Applicable.

Response to Question 11 & 12

Yatango USA provides the following information and certifications as required in Section 63.18(i) through (m) of the Commission’s Rules, 47 C.F.R. § 63.18(i)-(m):

- (i) Yatango USA certifies that it is not a foreign carrier, but it is affiliated with a foreign carrier in Australia.
- (j) Yatango USA certifies that it seeks to provide international telecommunications services to all global points, except those points on the Commission’s Exclusion List. Yatango USA also certifies that Yatango Mobile Pty Ltd controls both Yatango USA and foreign carrier Yatango Mobile (Australia) Pty Ltd in Australia, a destination country.
- (k) The destination foreign country, Australia, is a World Trade Organization Member country. Additionally, the foreign affiliate, Yatango Mobile (Australia) Pty Ltd, lacks market power in the named foreign country. Finally, Yatango USA could provide an effective competitive opportunities demonstration, but submits that Australia has a strong reputation for fair trade with the U.S. already, making such a demonstration unnecessary.

- (l) Yatango USA proposes to re-sell the international switched services of an unaffiliated U.S. carrier for the purpose of providing international communications services to a country where it is affiliated with a foreign carrier, Australia. But, as discussed in question 9, Yatango USA is presumptively non-dominant under 47 C.F.R. § 64.10(a)(3) as the foreign affiliate is a mobile service provider with less than 50% of the market share in the international transport and local access markets on the foreign end of the route.

- (m) Yatango USA qualifies as presumptively non-dominant per 47 C.F.R. § 63.10(a)(3) as its foreign affiliate in Australia, Yatango Mobile (Australia) Pty Ltd, is a relatively new start-up with none of its own facilities and it resells the services of another licensed provider, SingTel Optus. Thus, the affiliate lacks 50% of the market share in the international transport and local access markets. Yatango USA qualifies as presumptively non-dominant per 47 C.F.R. § 63.10(a)(4) as well. It provides service to the country of its foreign affiliate solely through the resale of an unaffiliated U.S. facilities-based carrier's (T-Mobile) international switched services.

Response to Question 13

Not Applicable.