

## ATTACHMENT 1

### **Application of Ring2 Communications 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,<sup>1</sup> Ring2 Communications LLC ("Ring2") seeks Commission authorization 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).

#### **Answer to Question 9**

Ring2 requests streamlined processing pursuant to Section 63.12 of the Commission's rules.<sup>2</sup> As further discussed below, Ring2 has foreign carrier affiliates in the United Kingdom and in Hong Kong, which are member countries of the World Trade Organization ("WTO"). Moreover, Ring2 qualifies for a presumption of non-dominance on the international routes between the United States and the United Kingdom and Hong Kong because its foreign carrier affiliates are not monopoly providers of communications services, and they lack 50 percent market share in the international transport and local access markets in the United Kingdom and Hong Kong.

#### **Answer to Question 11**

Ring2 responds to the questions and certifications set forth in Sections 63.18(i) through (m) of the Commission's rules as follows:

- (i) Ring2 certifies that it is not a foreign carrier, but that it is affiliated with foreign carriers in the United Kingdom and Hong Kong.
- (j) Ring2 certifies that it seeks authority to provide international resale services between the United States and the foreign countries listed in subsection (i) above. Ring2 is affiliated with its parent company Ring2 Communications Limited, which is authorized to provide service in the United Kingdom. Through its parent company, Ring2 also is affiliated with Ring2 (HK) Limited, which has a limited service-based operator license to provide teleconferencing in Hong Kong.
- (k) The United Kingdom and Hong Kong are members of the WTO. In addition, Ring2 Communications Limited lacks market power in the United Kingdom and Ring2 (HK) Limited lacks market power in Hong Kong.
- (l) Not applicable.

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<sup>1</sup> 47 U.S.C. § 214; 47 C.F.R. § 63.18.

<sup>2</sup> 47 C.F.R. § 63.12.

- (m) Ring2 requests non-dominant status on the international routes between the United States and the United Kingdom and Hong Kong. Its affiliates in the United Kingdom and Hong Kong are not monopoly providers of communications service in their respective markets. Its foreign affiliates also lack 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), Ring2 is presumptively classified as non-dominant on the international routes between the United States and the United Kingdom and Hong Kong.

**Response to Question 12**

As noted above in response to Question 11, Ring2 seeks authority to provide international resale services between the United States and the United Kingdom and Hong Kong.

## ATTACHMENT 2

### Application of Ring2 Communications LLC For Section 214 Authority to Provide International Resold Services

#### 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 Ring2 Communications LLC ("Ring2") are as follows:

#### *Direct Interest:*

Name:	Ring2 Communications Limited
Address:	First Floor, 78 Kingsland Road London, England E2 8DP
Citizenship:	United Kingdom
Principal Business:	Telecommunications
Percent Held:	99% interest in Ring2 <sup>1</sup>

#### *Indirect Interest:*

Name:	Adara Ventures SICAR
Address:	20 Bvd. Emmanuel Servais L-2535 Luxembourg
Citizenship:	Luxembourg
Principal Business:	Venture Capital
Percent Held:	34% in Ring2 Communications Limited

Name:	Andrew Scott
Address:	2 King Edward Parade Devonport, North Shore City 0624, Auckland, New Zealand
Citizenship:	United Kingdom and New Zealand
Principal Business:	Investor; trustee of The Scott Family Trust
Percent Held:	23% of Ring2 Communications Limited

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<sup>1</sup> Pimco 2711 Ltd ("Pimco"), which is a wholly-owned direct subsidiary of Ring 2 Communications Limited, holds the remaining 1% interest in Ring2. Pimco is a holding company organized under the laws of the United Kingdom and has the same address as Ring2 Communications Limited.

Name: The Scott Family Trust<sup>2</sup>  
Address: P.O. Box 32560  
Devonport, Auckland, New Zealand  
Devonport, North Shore City  
Citizenship: New Zealand  
Principal Business: Trust  
Percent Held: 12% of Ring2 Communications Limited

No other entity or individual holds a 10 percent or greater direct or indirect interest in Ring2.

Ring2 has no interlocking directorates with foreign carriers (except interlocking directorates with companies within the Ring2 group of companies).

### **Response to Question 15**

Ring2 responds to questions set forth in Sections 63.18(d), (e)(3) and (g) of the Commission's rules as follows:

- (d) Ring2 has not previously received authority under Section 214 of the Communications Act.
- (e)(3) Because Ring2 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 Ring2 does not seek facilities-based authority under Section 63.18(e)(3) of the Commission's rules, subsection (g) is not applicable.

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<sup>2</sup> Trustees of the Scott Family Trust include Andrew Scott, Rhonda Scott, and Axiome Trustee Limited. Primary beneficiaries of the Scott Family Trust include Jake Scott, Jessica Scott and Joshua Scott. The above listed members of the Scott family have dual United Kingdom and New Zealand citizenship, with the exception of Joshua Scott who is a citizen of the United Kingdom. Axiome Trustee Limited is a company organized under laws of New Zealand. Its principal business is serving as trustee, and its address is P.O. Box 32-560, Devonport, Auckland 0744, New Zealand.