

**Attachment 2 to Zactly's Application for International Section 214 Authority**

**A response to question 14** - [Section 63.18(h)] In Attachment 2, provide the name, address, citizenship and principal business of the applicant's ten percent or greater direct and indirect shareholders or other equity holders, and identify any interlocking directorates.

Ownership: **The following entities and individuals each own 10% or more of Zactly:**

**(1) Victor Bakunoff III, CEO Zactly Managed Services**  
**3760 Lawrenceville Rd**  
**Princeton, NJ 08540**  
**Citizen of United States of America**

**(3) Greg McFarlin, COO Zactly Managed Services**  
**422 Parkwood Drive**  
**Ashland OH 44805**  
**Resident of the USA**  
**Citizen of United States of America**

Interlocking Directorates: **Neither Zactly, Victor Bakunoff III or Greg McFarlin have any interlocking directorates with any carrier.**

Service Description: **Zactly's principle business is to provide international resold long distance service for USA customers to all international points.**

**A response to question 15** - In Attachment 2, respond to paragraphs (d), (e)(3) and (g) of Section 63.18.

**63.18(d).** A statement as to whether the applicant has previously received authority under Section 214 of the Act and, if so, a general description of the categories of facilities and services authorized (i.e., authorized to provide international switched services on a facilities basis) - **Zactly has never applied before and has therefore never received any previous Section 214 authority.**

**63.18(e).** One or more of the following statements, as pertinent:

**(3) Other authorizations.** If applying for authority to acquire facilities or to provide services not covered by paragraphs (e)(1) and (e)(2) of this section, the applicant shall provide a description of the facilities and services for which it seeks authorization. The applicant shall certify that it will comply with the terms and conditions contained in §§ 63.21 and 63.22 and/or 63.23, as appropriate. Such description also shall include any additional information the Commission shall have specified previously in an order, public notice or other official action as necessary for authorization - **N/A - Zactly is not applying for authority to acquire facilities or to provide services not covered by paragraphs (e)(1) and (e)(2) of this section.**

**63.18(g).** Where the applicant is seeking facilities-based authority under paragraph (e)(3) of this section, a statement whether an authorization of the facilities is categorically excluded as defined by § 1.1306 of this chapter. If answered affirmatively, an environmental assessment as described in § 1.1311 of this chapter need not be filed with the application - **N/A – Zactly is not seeking facilities-based authority under paragraph (e)(3) of this section.**

**63.18(e)(2)(iii) Compliance Statement:** Zactly certifies that it will comply with the terms and conditions contained in §§ 63.21 and 63.23 of Part 63 of the Commission's rules.