## **ATTACHMENT 1**

Reliance Jio Infocomm USA, Inc. ("Applicant") requests authority, pursuant to Sections 63.18(e)(1) and 63.18(e)(2) of the rules, to provide international facilities-based and resold services to all international points. The Applicant certifies that it will comply with the terms and conditions of 47 C.F.R. §§ 63.21, 63.22, and 63.23.

## Response to Question 9

The Applicant requests streamlined processing of this application pursuant to Section 63.12 of the Commission's rules. As demonstrated below, although the Applicant is affiliated with a foreign carrier within the meaning of Section 63.09(d) and (e) of the rules, the Applicant qualifies for a presumption of non-dominance under Section 63.10(a)(3). The Applicant is not affiliated with any U.S. carrier. Consequently, this application qualifies for streamlined processing under Section 63.12(c)(1)(ii).

## Response to Question 11

The following information is submitted pursuant to Sections 63.18(i) through (m) of the rules:

- (i) The Applicant is affiliated with a foreign carrier in the following countries: India; Singapore; United Kingdom. The Applicant is not a foreign carrier in any foreign country.
- (j) The Applicant seeks to provide international telecommunications services to all international points, including the countries of India, Singapore, and the United Kingdom. The Applicant is not a foreign carrier in these or any other countries, nor does the Applicant control a foreign carrier in any country. Entities that control and own more than 25 percent of the Applicant (specifically, Reliance Jio Infocomm Limited ("RJIL"), Reliance Industries Limited ("RIL"), and Sh. Mukeesh Ambani) also control a foreign carrier each of these countries. Those foreign carriers are:

Name: Reliance Jio Infocomm Limited

Country: India

Relationship to Applicant: Holder of 100% of the equity of the Applicant; RJIL

and the Applicant are commonly owed by RIL and Sh. Mukeesh Ambani, and commonly controlled by Sh. Ambani, who is the Chairman, Managing Director and largest shareholder of RIL. (See Attachment 2)

Name: Reliance Jio Infocomm Pte Limited

Address: 250 North Bridge Road

# 16-01 Raffles City Tower

Singapore 179101

Country: Singapore

Relationship to Applicant: RJIL, which owns 100% of the Applicant (see

Attachment 2), also owns 100% of Reliance Jio

Infocomm Pte Limited.

Name: Reliance Jio Infocomm UK Limited Address: 105 Wigmore Street, 8<sup>th</sup> Floor

London, United Kingdom, W1U 1QY

Country: United Kingdom

Relationship to Applicant: RJIL, which owns 100% of the Applicant (see

Attachment 2), also owns 100% of Reliance Jio

Infocomm UK Limited

- (k) With respect to each destination foreign country identified in (j) above, such country is a Member of the World Trade Organization, and the Applicant's affiliated foreign carrier lacks market power. Both Reliance Jio Infocomm Pte Limited and Reliance Jio Infocomm UK Limited have been authorized to provide service, but are not providing services at this time.
- (l) The Applicant proposes to resell the international switched services of an unaffiliated U.S. carrier to provide service to India, Singapore, and/or the United Kingdom. In each of those countries, the Applicant's affiliated foreign carrier has not yet begun providing services, and thus lacks 50 percent market share.
- (m) Because none of the foreign carriers with which the Applicant is affiliated has 50 percent or more market share in the international transport and local access markets on its respective foreign end of the route, the Applicant presumptively should be classified as non-

dominant pursuant to Section 63.10(a)(3) of the rules. RJIL has been authorized to provide services in India, but has not yet begun to provide services and has no market share. As noted, both Reliance Jio Infocomm Pte Limited and Reliance Jio Infocomm UK Limited have been authorized to provide service, but are not providing services at this time.

## Response to Question 12

As noted in response to Question 11, the Applicant seeks authority to provide services to India, Singapore, and the United Kingdom.