

ATTACHMENT 1
Google North America Inc. International Section 214 Application

Question 9 - Request for Streamlined Processing (Section 63.12):

Google North America Inc. (“Google NA”) qualifies for streamlined processing under Section 63.12 of the Commission’s rules. As discussed below, Google NA has foreign carrier affiliates in Hong Kong and Singapore, which are member countries of the World Trade Organization (“WTO”). Pursuant to 47 CFR § 63.10(a)(3), Google NA qualifies for a presumption of non-dominance on the international routes between the United States and Hong Kong and Singapore because its foreign carrier affiliates lack 50 percent market share in the respective international transport and local access markets in Hong Kong and Singapore.

Question 10 - Authority to Provide Switched Services Over Private Lines (Section 63.16):

Google NA is not applying to provide private switched services over private lines.

Question 11 - Foreign Carrier Affiliations (Section 63.18(i) through (m)):

Section 63.18(i)

Google NA certifies that it is not a foreign carrier, as that term is defined by Section 63.09 of the Commission’s rules.

Google NA certifies that, through its ownership by Google Inc., it is affiliated with the following foreign carriers, as that term is defined by Section 63.09 of the Commission’s rules:

<i>Name of the affiliated foreign carrier</i>	<i>Countries in which carrier is authorized to provide telecommunications services to the public</i>
Google Singapore Pte Ltd	Singapore
Infracore (Hong Kong) Limited	Hong Kong

Section 63.18(j)

Google NA certifies that it does not request authority to provide international telecommunications services to any destination country in which Google NA is a foreign carrier or controls a foreign carrier.

Google NA certifies that Google Inc. owns more than 25 percent of Google NA, and that Google NA requests authority to provide international telecommunications services to each of the destination markets identified above, in which Google Inc. owns more than 25 percent of an affiliated foreign carrier.

Section 63.18(k)

Each of the destination countries listed in the response to Section 63.18(i) is a Member country of the WTO. In addition, Google Singapore Pte Ltd lacks market power in Singapore and Infracore (Hong Kong) Ltd lacks market power in Hong Kong.

Section 63.18(l)

Pursuant to Section 63.10(a)(3) of the Commission's rules, Google NA certifies that each of its foreign carrier affiliates listed in response to Section 63.18(i) lacks 50 percent market share in the international transport and the local access markets of the foreign end of the affiliate's route. Accordingly, Google NA is presumptively classified as non-dominant.

Section 63.18(m)

Google NA qualifies for a presumption of non-dominance under Sections 63.10(a)(1) and (3) because it is not a foreign carrier, and its affiliation is with non-dominant foreign carriers in countries that are Members of the WTO. See responses to Section 63.18(k) and (l).

Question 12 - Authority to Provide Service to Destinations in Section 63.18(j):

Google NA requests authority to provide service to Hong Kong and Singapore.

Question 13 - Authority to Provide Service to Other Destinations:

Not applicable.