

International 214 Application

RESPONSE TO QUESTION 9

Section 63.18(p) Applicant requests and qualifies for streamlined processing pursuant to Section 63.12(a) and (b), because:

1. Applicant is not affiliated with a foreign carrier in a destination market.
2. Applicant is not affiliated with a dominant U.S. carrier whose international switched or private line services the applicant seeks authority to resell (either directly or indirectly through the resale of another reseller's services).

RESPONSE TO QUESTION 10

Section 63.16 Applicant is not requesting authority to provide switched service over private lines.

RESPONSE TO QUESTIONS 11 & 12

Section 63.18(i) Applicant certifies that, it is not affiliated with a foreign carrier.

Section 63.18(j) Applicant certifies that, it does not seek to provide international telecommunication services to any destination country for which any of the following is true:

1. The applicant is a foreign carrier in that country; or
2. The applicant controls a foreign carrier in that country; or
3. Any entity that owns more than 25 percent of the applicant, or that controls the applicant, controls a foreign carrier in that country.
4. Two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of the applicant and are parties to, or the beneficiaries of, a contractual relation (e.g., a joint venture or market alliance) affecting the provision or marketing of international basic telecommunications services in the United States.