

Attachment 1

CERTIFICATE

The undersigned hereby certifies, on behalf of Great Lakes Communication Corp. (“Great Lakes” or “Applicant”) with respect to the foregoing application for authority to provide international services, that:

1. With respect to Question 9 of this Application, Great Lakes states that this Application qualifies for streamlined processing pursuant to Section 63.12(c) of the Commission’s rules, 47 C.F.R. § 63.12(c), and in further support thereof states as follows:

Although Great Lakes is affiliated with a foreign carrier authorized to provide service in Mexico, namely Tele Fácil Mexico, S.A. de C.V. (“Tele Fácil”), it qualifies for a presumption of non-dominance under Section 63.10(a)(3) of the Commission’s rules. 47 C.F.R. § 63.10(a)(3).

Tele Fácil qualifies for non-dominant classification on the route between the United States and Mexico because Tele Fácil has no market power in Mexico. *See* 47 C.F.R. § 63.10(a)(3) (“If the U.S. carrier demonstrates that the foreign affiliate lacks 50 percent market share in the international transport and the local access markets on the foreign end of the route, the U.S. carrier shall presumptively be classified as non-dominant.”). While Tele Fácil has obtained a concession from the Government of Mexico to provide competitive wireline, wireless, Internet, and television services in Mexico, a dispute regarding the terms of interconnection with Telefonos de Mexico (“TelMex”), Mexico’s former monopolist provider of telecommunications services, and the recognized preponderant economic agent in Mexico’s telecommunications market,¹ has prevented Tele Fácil from commencing its service offerings in Mexico. Accordingly, Tele Fácil has no current customers and no market power.² Moreover, Tele Fácil is not listed on the Commission’s List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets. *See The International Bureau Revises and Reissues the Commission’s List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets*, Public Notice, DA 07-233 (Jan. 26, 2007). As such, Tele Fácil is presumptively classified as non-dominant on the U.S.-Mexico route. Further, the

¹ *See, e.g.*, Form 6-K of América Móvil, S.A.B. de C.V. (filed with the Securities and Exchange Commission for July 2014), *available at*: <http://www.sec.gov/Archives/edgar/data/1129137/000129281414001635/amx201407086k.htm> (describing the measures that América Móvil will take to have Telmex cease being classified as the preponderant economic agent in the telecommunications market).

² *See, e.g.*, Tele Fácil contra Telmex, El Financiero, *available at*: <http://www.elfinanciero.com.mx/pages/tele-facil-contra-telmex.html> (providing a timeline of the interconnection dispute between Tele Fácil and TelMex).

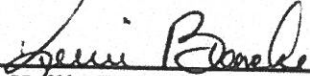
provisions of §63.12(c)(2) do not apply to Great Lakes because it does not have an affiliation with a dominant U.S. carrier.

2. In response to Question 11 of this Application, Great Lakes provides the following information and certifications required by Section 63.18(i) through (m):

- a. 63.18(i): As noted above, Great Lakes is affiliated with a single foreign carrier, namely Tele Fácil. While Tele Fácil does not currently provide service in Mexico, its concession entitles it to provide domestic service solely in Mexico.
- b. 63.18(j)(1): Great Lakes does not seek to provide international telecommunications services where it is a foreign carrier in that country;
- c. 63.18(j)(2) and (3): Mr. Joshua D. Nelson is Chief Executive Officer of, controls (as that term is used in 47 C.F.R. § 63.09(b)), and has an indirect ownership interest in, Great Lakes. Further, Mr. Nelson controls Tele Fácil.
- d. 63.18(j)(4): Great Lakes does not seek to provide international telecommunications services where two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of Great Lakes and are parties to, or the beneficiaries of, a contractual relation affecting the provision or marketing of international basic telecommunications services in the United States.
- e. 63.18(k): Great Lakes listed only Mexico in response to paragraph (j) of Section 63.18. Mexico is a member of the World Trade Organization. See https://www.wto.org/english/thewto_e/countries_e/mexico_e.htm.
- f. 63.18(l): Not applicable.
- g. 63.18(m): Great Lakes incorporates by reference here its response in paragraph number 1 above as its demonstration that Tele Fácil lacks 50 percent market share in the applicable routes.

3. In response to Question 12 of this Application, and as noted above, Great Lakes identifies Mexico.

4. Great Lakes will comply with the terms and conditions contained in Sections 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.F.R. §§ 63.21-23

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