

RESPONSE TO QUESTION 14

Section 63.18(h) Applicant has no interlocking directorates (*i.e.*, persons or entities who perform the duties of “officer or director” in an authorized U.S. international carrier who also performs such duties for any foreign carrier) with foreign carriers. Sully Telephone Association is 100% owned by U.S. citizen shareholders. No person or entity has a direct or indirect ownership interest in Sully Telephone Association which is equal to or greater than 10%.

RESPONSE TO QUESTION 15

Section 63.18(d) Applicant has not previously received authority under Section 214 of the Act.

Section 63.18(e)(3) Applicant requests no authorizations other than those under Sections 63.18(e)(1) and 63.18(e)(2) of the Commission’s rules. Applicant certifies that it will comply with the terms and conditions contained in Sections 63.21, 63.22 and 63.23 of the Commission’s rules, as appropriate.

Section 63.18(g) Not Applicable.