

Response to Question 9

This Applicant qualifies for streamlined processing for the following reasons. First, neither Applicant nor any of its affiliates is affiliated with any dominant U.S. carrier whose international switched or private line services are being resold. Second, although Applicant is affiliated with foreign carriers in the U.K., Germany, Sweden, Poland and Denmark, none of these foreign carriers is a monopoly provider of international transport facilities or services, including cable landing station access and backhaul facilities; inter-city facilities or services; and local access facilities or services in their destination countries nor does any of them hold sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market. None of these affiliates appears on the Commission's dominant carrier list and none of these affiliates even approaches anywhere near to a 50 percent market share in the international transport and the local access markets on the foreign end of the applicable route and therefore qualify for the presumption of non-dominance pursuant to section 63.10(a)(3) of the Commission's rules.

Response to Questions 11-13

Applicant's parent company, Limitless Mobile Holdings, LLC holds controlling interests in the following foreign companies with whom Applicant is affiliated and to which destination countries the Applicant wishes to provide International Services:

- Limited Mobile ApS ("Limitless Denmark") is contractually authorized to provide mobile voice and data services in Denmark, a WTO member country, on a resale basis. Limitless Denmark provides mobile wireless services to the public and also operates as Mobile Virtual Network Enabler and Aggregator ("MVNE/MVNA"). As an MVNA, Limitless Denmark resells the mobile wireless capacity of non-affiliated mobile wireless networks on a wholesale basis to non-affiliated Mobile Virtual Network Operators ("MVNO") that provide mobile wireless voice and data services to the public. As an MVNE, Limitless Denmark offers certain support and back office services, such as ordering, billing and provisioning services to support unaffiliated MVNOs. Limitless Denmark lacks market power in Denmark and qualifies for a presumption of non-dominance under Section 63.10(a)(3) of the Commission's rules. The company does not control bottleneck facilities and has a market share under 50 percent in all relevant markets on the foreign end of the U.S.-Denmark route, including the international transport and local access markets. Limitless Denmark is not listed for Denmark on the Commission's Market Power List.¹

¹*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) ("Market Power List").

- Limited Mobile GmbH (“Limitless Germany”) operates in Germany, a WTO member country, as a Mobile Virtual Network Aggregator. As an MVNA, Limitless Germany offers certain support and back office services, such as ordering, billing and provisioning services to support unaffiliated MVNOs. Limitless Germany also provides switching services for other carriers. Limitless Germany lacks market power in Germany and qualifies for a presumption of non-dominance under Section 63.10(a)(3) of the Commission’s rules. The company does not control bottleneck facilities and has a market share under 50 percent in all relevant markets on the foreign end of the U.S.–Germany route, including the international transport and local access markets. Limitless Germany is not listed for Germany on the Commission’s Market Power List.
- Limitless Mobile AB (“Limitless Sweden”) is contractually authorized to provide mobile voice and data services in Sweden, a WTO member country, on a resale basis. Limitless Sweden resells mobile wireless services the public and also operates as an MVNE/MVNA. As an MVNA, Limitless Sweden resells the mobile wireless capacity of non-affiliated mobile wireless networks on a wholesale basis to non-affiliated Mobile Virtual Network Operators that also provide mobile wireless voice and data services to the public. As an MVNE, Limitless Sweden offers certain support and back office services, such as ordering, billing and provisioning services to support unaffiliated MVNOs. Limitless Sweden lacks market power in Sweden and qualifies for a presumption of non-dominance under Section 63.10(a)(3) of the Commission’s rules. The company does not control bottleneck facilities and has a market share under 50 percent in all relevant markets on the foreign end of the U.S.–Sweden route, including the international transport and local access markets. Limitless Sweden is not listed for Sweden on the Commission’s Market Power List.
- Limitless Mobile SP Z.O.O (“Limitless Poland”) is contractually authorized to provide mobile voice and data services in Poland, a WTO-member country, on a resale basis. Limitless Poland operates as Mobile Virtual Network Enabler and Aggregator (“MVNE/MVNA”). As an MVNA, Limitless Poland resells the mobile wireless capacity of non-affiliated mobile wireless networks on a wholesale basis to non-affiliated Mobile Virtual Network Operators (“MVNO”) that provide mobile wireless voice and data services to the public. As an MVNE, Limitless Poland offers certain support and back office services, such as ordering, billing and provisioning services to support unaffiliated MVNOs. Limitless Poland lacks market power in Poland and qualifies for a presumption of non-dominance under Section 63.10(a)(3) of the Commission’s rules. The company does not control bottleneck facilities and has a market share under 50 percent in all relevant markets on the foreign end of the U.S.– Poland route, including the international transport and local access markets. Limitless Poland is not listed for Poland on the Commission’s Market Power List.
- Limited Mobile Limited (“Limitless UK”) is contractually authorized to provide mobile voice and data services in the United Kingdom, a WTO-member, on a resale basis. Limitless UK operates as a Mobile Virtual Network Enabler and Aggregator

(“MVNE/MVNA”). As an MVNA, Limitless UK resells the mobile wireless capacity of non-affiliated mobile wireless networks on a wholesale basis to non-affiliated Mobile Virtual Network Operators (“MVNO”) that provide mobile wireless voice and data services to the public. As an MVNE, Limitless UK offers certain support and back office services, such as ordering, billing and provisioning services to support unaffiliated MVNOs.

- Falmar Limited (“Falmar”) is a wholly-owned subsidiary of Limitless UK and was formed for the purpose of undertaking special individual projects on an as-needed basis.

All of the aforementioned countries are WTO member countries. As set forth above, the Applicant and each of its affiliates qualify as non-dominant in that they lack sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market. Furthermore, none of Applicant’s foreign affiliates even come close to approaching a 50 percent market share in international transport facilities or services, including cable landing station access and backhaul facilities, intercity facilities or services, and local access facilities or services on the foreign end of a particular route.

Applicant seeks authority to provide resale and/or facilities based service to all international points, including international points where it has no foreign carrier affiliations.