

Soracom Global, Inc.
Application for Section 214 Authority
Attachment 1

Question 9

The Applicant qualifies for streamlined processing under 47 CFR § 63.12. Rule 63.12(c)(1) provides that the streamlining procedures shall apply where the applicant is affiliated with a foreign carrier in a destination market that is a WTO member country and the applicant agrees to be classified as a dominant carrier to the affiliated destination country under Section 63.10 of the Commission's rules.

As detailed in Attachment 1, Soracom Global, Inc., is a direct wholly owned subsidiary of Soracom, Inc. Soracom International, PTE, Ltd., a Singapore private limited company, is a wholly owned subsidiary of Soracom, Inc.

KDDI Corporation owns more than 50% of the stock of the Applicant's direct parent. KDDI Corporation owns and operates a portfolio of telecommunications companies throughout the world. By virtue of KDDI Corporation's indirect ownership of the Applicant and KDDI Corporation's greater than 25% ownership in the following foreign carriers, the Applicant is affiliated with foreign carriers as follows:

- KDDI Korea Corporation, Korea
- KDDI Europe Ltd., United Kingdom
- KDDI Deutschland GmbH, Germany
- KDDI France SAS, France
- KDDI Singapore Pte Ltd, Singapore
- KDDI Summit Global Myanmar Co., Ltd., Myanmar
- KDDI Hong Kong, Ltd., Hong Kong
- KDDI Australia Pty Ltd, Australia
- Mobicom Corporation, Mongolia
- KDDI Thailand, Thailand
- KDDI Malaysia, Malaysia
- KDDI Indonesia, Indonesia
- KDD Philippines, Philippines
- KDD Vietnam, Vietnam
- KDDI India, India
- KDDI Corporation, Japan
- UBIK do Brasil Solucoes em Tecnologia Ltda
- KDDI Rus limited liability company
- KDDI TAIWAN Corporation

Question 11

For purposes of this application, Applicants submit that, with the exception of KDDI Corporation, Japan (a WTO member country), the Applicant qualifies for a presumption of non-dominance for each of the routes where it holds foreign carrier affiliations under Section 63.10(a)(3) of the Commission Rules, 47 C.F.R. § 63.10(a)(3), as each of these carriers lacks a 50% market share in the international transport and local access markets on the foreign end of that route. Applicant agrees to be classified as a dominant carrier on the U.S.-Japan route under Sections 63.10(c)-(e) of

the Commission's Rules, 47 C.F.R. §§ 63.10(c)-(e) without prejudice to its right to petition for reclassification at a later date.

Question 12

The applicant seeks authority to provide service to the countries identified in response to Questions 9 and 11, above.