

Question 9:

iTel Networks Inc. (“iTel”) desires streamlined processing pursuant to Section 63.12 of the Commission's rules. iTel qualifies for streamlined processing under Section 63.12(c)(1)(ii) because although iTel is licensed as a foreign carrier in a destination market, iTel qualifies for a presumption of non-dominance under Section 63.10(a)(3). As more fully described in response to Question 11 below, iTel qualifies for a presumption of non-dominance under Section 63.10(a)(3) because iTel is not a monopoly provider and does not have more than 50% of the market share for international transport or local access on the foreign end of the relevant routes.

The other restrictions set forth in Section 63.12(c) of the Commission's rules do not apply. iTel does not have an affiliation with a dominant U.S. carrier whose international switched or private line services the applicant seeks authority to resell. And iTel does not seek authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines.

Question 11:

**63.18(i)** – iTel hereby certifies that it holds a license from the Canadian Radio-Television and Telecommunications Commission in Canada.

**63.18(j)** – iTel hereby certifies that it seeks to provide international telecommunications services to Canada, where it is licensed to provide telecommunications services.

**63.18(k)** – Canada is a member of the WTO. In addition, iTel lacks market power in Canada. iTel has less than 50% of the market for telecommunications services and access lines in Canada.

**63.18(l)** – iTel desires the authority to resell the international switched services of an unaffiliated U.S. carrier on the routes to Canada. Accordingly, pursuant to Section 63.10(a)(3), iTel hereby certifies that it is not a monopoly provider in Canada. iTel further submits the following information to demonstrate that iTel does not have sufficient market power on the foreign end of the routes to the countries specified above to adversely affect competition in the U.S. market: iTel has less than 50% of the market for telecommunications services and access lines in Canada.

**63.18(m)** – iTel desires to be classified as non-dominant. iTel submits that the information set forth above for Section 63.18(l) demonstrates that it is

presumptively non-dominant under Section 63.10(a)(3) of the Commission's Rules.

Question 12:

As described above, iTel desires to be authorized to provide international telecommunications services to, among other countries, Canada, where it is a licensed carrier, as described above.

Question 13:

iTel desires to be authorized to provide international telecommunications services to all international points. iTel has no foreign affiliations or licenses other than those described above.

Question 15:

- (d) iTel has not received authority previously under Section 214 of the Communications Act.
- (e) iTel 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.
- (f) At this time, iTel seeks no other authorization available under Section 63.18(e).
- (g) Not applicable.