

**ATTACHMENT 1  
RAKUTEN MOBILE USA LLC  
INTERNATIONAL SECTION 214 APPLICATION**

**Question 9 - Does the applicant request streamlined processing pursuant to 47 C.F.R. Section 63.12? If yes, include in Attachment 1 a statement of how the application qualifies for streamlined processing.**

Rakuten Mobile USA LLC is eligible for the streamlined process because under 63.12(c)(1)(ii) it qualifies for a presumption of non-dominance because its foreign affiliate, Rakuten Mobile, Inc. (Japan), lacks 50 percent market share in the international transport and the local access markets on the Japan end of the route. As of March 31, 2021, Rakuten Mobile, Inc. (Japan) has 2.9 million subscribers in Japan out of 195 million total Japanese mobile subscribers, which is just over 1.5% of the Japanese market.

**Question 11 - If the application is a foreign carrier, or is affiliated (as defined in 47 C.F.R. Section 63.09(e)) with a foreign carrier, provide in Attachment 1 the information and certifications required by Section 63.18(i) through (m).**

63.18(i): Rakuten Mobile USA LLC is affiliated with a foreign carrier, Rakuten Mobile, Inc., which is located in Japan.

63.18(j): Rakuten Mobile USA LLC seeks to provide international telecommunications services to Japan. Rakuten Mobile, Inc. is a foreign carrier in Japan that owns 100% of the applicant, Rakuten Mobile USA LLC.

63.18(m): Rakuten Mobile USA LLC, and its parent, Rakuten Mobile, Inc., are qualified for non-dominant classification pursuant to § 63.10(a)(3) as Rakuten Mobile, Inc. lacks 50 percent market share in the international transport and the local access markets on the Japanese end of the route. In Japan, KDDI and NTT are the two carriers recognized on the FCC's Foreign Carriers with Market Power as dominant. Pursuant to § 63.10(a)(3) Rakuten Mobile, Inc. is non-dominant as, as of March 31, 2021, it currently has 2.9 million subscribers out of 195 million total Japanese mobile subscribers, or just over 1.5% of the Japanese market..

**Question 12 - Does the applicant seek authority to provide service to any destination described in paragraphs (1) through (4) of Section 63.18(j)? If yes, list those destinations in Attachment 1 as a response to question 12.**

Rakuten Mobile USA LLC seeks authority to provide service to Japan, where its parent company, Rakuten Mobile, Inc., is a foreign carrier.