

Vocus Group Limited
FCC International Section 214 Application
Attachment 1

Vocus Group Limited (“Applicant”) pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, hereby requests authority to operate as a global facilities-based and resale carrier pursuant to the terms and conditions of 47 C.F.R. § 63.18(e)(1) and (2) as authorized by the Commission.

Item 9. Furthermore, as explained herein, this Application qualifies for streamlined processing under 47 C.F.R. § 63.12, as Applicant meets the criteria set forth therein:

- (1) Applicant is not affiliated with a foreign carrier; and
- (2) Applicant does not have an affiliation with any dominant U.S. carriers whose international switched or private line services Applicant seeks authority to resell.

Item 11. Applicant is a foreign carrier in Australia and New Zealand, and seeks to provide international telecommunications services to both countries. Applicant has no other affiliation with any foreign carrier in any of the destination countries for which authority is requested. Applicant lacks 50% market share in the international transport and the local access markets on the foreign end of any routes. Thus, pursuant to 47 C.F.R. § 63.10(a)(3), Applicant should be classified as a non-dominant carrier in its provision of international services.

Item 12. Applicant seeks to provide international telecommunications services to both Australia and New Zealand.