

ATTACHMENT 1

1. Response to Question 9:

- 1.1 As per 47 § 63.12(c)(1)(ii) of the Code of Federal Regulations ('CFR'), OneQode LLC qualifies for streamlined processing by reason that the applicant qualifies for a presumption of non-dominance under § 63.10(a)(3), as explained below in response to Question 11 and 47 § 63.18(m).

2. Response to Question 11:

2.1 **47 CFR § 63.18(i):**

OneQode LLC certifies that it is not a foreign carrier, as the term 'foreign carrier' is defined under 47 CFR § 63.09(d), nor does it control any foreign carriers. OneQode LLC further certifies that it is affiliated, pursuant to 47 CFR § 63.09(e), with foreign carriers in Australia, Singapore and Cyprus.

2.2 **47 CFR § 63.18(j):**

OneQode LLC certifies that it seeks to provide international telecommunication services to the destination countries listed in the table below where an entity owns more than 25 percent of the applicant, or that controls the applicant, controls a foreign carrier in that country:

Destination Country	Affiliated Entity
Australia	OneQode Assets Pty Ltd
Singapore	OneQode Pte Ltd
Cyprus	OneQode Ltd

OneQode LLC further certifies that:

- (i) it is not a foreign carrier in any country;
- (ii) it does not control a foreign carrier in any destination country; and
- (iii) two or more foreign carriers (or parties that control foreign carriers) do not own, in the aggregate, more than 25 percent of the application and are parties to, or the beneficiaries of, a contractual relation affecting the provision of marketing of international basic telecommunications services in the United States.

2.3 47 C.F.R. § 63.18(k):

Australia, Singapore and Cyprus are WTO member countries.¹

2.4 47 C.F.R. § 63.18 (m):

The entities that comprise the OneQode Group are relatively new entrants in their respective markets and each lacks 50 percent market share in either of the international transport or the local access markets in their respective jurisdictions. Further, none of the OneQode Group entities are listed on the Commission's list of foreign telecommunications carriers which are presumed to possess market power in foreign telecommunications markets. As such, the OneQode Group entities qualify for the presumption of non-dominance as per § 63.10(a)(3) and the exemptions from the dominant carrier safeguards in 47 CFR § 63.10(c)-(e).

3. Response to Question 12:

OneQode LLC seeks authority to provide services to Australia, Singapore and Cyprus with each being a destination country listed in response to Question 11 and 47 CFR § 63.18(j)(3) where an affiliated foreign carrier operates.

¹ World Trade Organization, 'Members and Observers', *Understanding the WTO: The Organization, Members and Observers* (Web Page), https://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm.

4. Response to Question 13

OneQode LLC seeks authority to provide global facilities-based and global resale services to all international points, including those destination countries listed in response to Question 12.