INTERNATIONAL SECTION 214 APPLICATION
ATTACHMENT II

In the Matter of	)	
	)	
MAK Networks, Inc.	)	
	)	File No. ITC-
Application for Authority Under	)	
Section 214 of the Communications	)	
Act of 1934, as amended, to Provide	)	
International Facilities-Based Services	)	
and International Resale Services,	)	
On a Global Basis	)	

APPLICATION

MAK Networks, Inc. ("MAK Networks"), hereby requests authority pursuant to Section 214 of the Communications Act of 1934 (the "Act"), as amended, 47 U.S.C. § 214, and 47 C.F.R. § 63.18 of the rules of the Federal Communications Commission ("FCC" or "Commission") to provide international facilities-based and resale services on a global basis pursuant to Section 63.18(e)(6) of therules of the FCC, 47 C.F.R. § 63.18(e)(6). MAK Networks request non-dominant classification pursuant to Section 63.10 of the rules of the FCC, 47 C.F.R. § 63.10. In

addition, MAK Networks request streamlined processing of this application in accordance with Section 63.12(c) (l) (i) of the rules of the FCC, 47 C.F.R. § 63.12(c) (l)(i).

Pursuant to 47 C.F.R. § 63.18 of the rules of the FCC, MAK Networks set forth the following information in support of its request for authorization:

(a) The name, address and telephone number of MAK Networks are:

MAK Networks, Inc.
2525 W. 8th Street, Suite 300
Los Angeles, CA 90057
Telephone: (213) 388-3030

(b) MAK Networks is a corporation organized and existing under the laws of the state of California.

(c) The name, title, address, and telephone number of the contact point(s) to whom correspondence should be sent is:

Mr. Benjamin Yoon
MAK Networks, Inc.
2525 W. 8th Street, Suite 300
Los Angeles, CA 90057
Telephone: (213) 388-3030

(d) MAK Networks have not received any prior authorizations under Section 214 of the Act.

(e) MAK Networks request authority for: (i) global facilities-based Section 214 authority pursuant to the terms and conditions of Section 63.18(e)(1) of the rules of the FCC, 47 C.F.R. § 63.18(e)(1); and (ii) global resale Section 214 authority pursuant to the terms and conditions of Section 63.18(e)(2) of the rules of the FCC, 47 C.F.R. § 63.18(e)(2). MAK Networks seek such authority pursuant to the terms and conditions of Section 63.18(e)(6) of the rules of the FCC, 47 C.F.R. § 63.18(e)(6). In accordance with Section 63.18(e)(6), MAK Networks' affiliate, DVS Networks, Korea, Inc, is a non-dominant provider of domestic communications services in the Republic of Korea. [1] In addition, DVS Networks, Korea, Inc owns its own international transport facilities for the provision of international communications services.

(f) At this time, MAK Networks seeks no other authorization available under Section 63.18(e) of the rules of the FCC, 47 C.F.R. § 63.18(e).

(g) An environmental assessment is not necessary.

(h)(l) By the attached certification, MAK Networks hereby certify that it is a wholly - owned subsidiary of DVS Networks Korea, Inc, a corporation which is organized an operated under the laws of the Republic of Korea and which provides domestic andinternational telecommunications services in the Republic of Korea.

(h)(2) Other than DVS Networks, Korea, Inc, there are no individual shareholders with a 10 percent or greater interest in MAK Networks. DVS Networks Korea, Inc corporate address in the Republic of Korea is HALLA CLASSIC #910, YUKSAMDONG KANG NAM GU, SEOUL, KOREA.

(h)(3) By the attached certification, MAK Networks certify that it has no affiliation, as defined in 47 C.F.R. § 63. l 8(h)(3), with any U.S. carrier whose services MAK Networks will resell.

(h)(4) MAK Networks will ensure that the certifications made under (h)(l) - (3) of Section 63.18 of the rules of the FCC, 47 C.F.R. § 63.18, continue to be accurate by filing

---

Korea Telecom is the dominant provider of domestic and international services in the Republic of Korea. See Korea Telecom America Application for Authority Under Section 214 of the Communications Act of 1934. as amended to Provide Non-Interconnected Private Line Service Between the United States any corrected certifications with the Secretary of the Commission within thirty (30) days of such change.

(h)(5) The Republic of Korea is a Member of the World Trade Organization and signatory to the Basic Telecom Agreement.

(h)(6) This section does not apply to MAK Networks because MAK Networks does not seek to resell the international switched or non-interconnected private line services of another U.S. carrier for the purpose of providing international communications services to the Republic of Korea.[2]

(h)(7) This section does not apply to MAK Networks because MAK Networks does not seek to resell the international switched services of an unaffiliated U.S. carrier for the purpose of providing international communications services to the Republic of Korea.

(h)(8) MAK Networks seeks regulatory status as a non-dominant carrier for the provision of telecommunications services to the Republic of Korea. Pursuant to Section 63.1O(a)(3) of the rules of the FCC, 47 C.F.R. § 63.10(a)(3), MAK Networks' affiliate, DVS Networks Korea, Inc, lacks fifty (50) percent market share in the international transport and the local access markets in the Republic of Korea. In addition, DVS Networks Korea, Inc

---

and the Republic of Korea and Resale of Switched Services Between the United States and the Republic of Korea Application, File No. ITC-98-160.

MAK Networks seeks authorization to provide switched, basic telecommunications services using resold international private lines only in circumstances where the Commission has specifically authorized the provision of such services to particular countries at the foreign end.

does not own any international transport facilities for the provision of Packet-switched data services.

(i) By the attached certification, MAK Networks certify that it has not received or agreed to accept any special concessions, directly or indirectly, from any foreign carrier with respect to any U.S. international route where the foreign carrier possess sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future.

(j) By the attached certification, MAK Networks hereby certify that no party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

(k) MAK Networks request streamlined processing pursuant to Section 63.12(c)(l)(i) of the rules of the FCC, 47 C.F.R. § 63.12(c)(l)(i). MAK Networks seeks authorization pursuant to the terms and conditions of Sections 63.18(e)(l); 63.18(e)(2); and 63.18(e)(6) of the rules of the FCC, 47 C.F.R. § 63.18(e)(l); 47 C.F.R. § 63.18(e)(2); and 47 C.F.R. § 63.18(e)(6). As a result, MAK Networks qualify for streamlined processing because it seeks no other authorization available under Section 63.18(e) of the rules of the FCC, 47 C.F.R. § 63.18(e). MAK Networks also qualify for streamlined processing because its affiliate, DVS Networks Korea, Inc, lacks sufficient market power in the Republic of Korea to affect competition adversely in the U.S. market. In addition, MAK Networks is presumptively non-dominant pursuant to Section 63.10 of the rules of the FCC, 47 C.F.R. § 63.10, because MAK Networks, Inc affiliate, DVS Networks Korea, Inc,lacks 50 percent market share in the international transport and the local access markets in the Republic of Korea. In addition, the Republic of Korea is a Member of the World Trade Organization and is signatory to the Basic Telecom Agreement.

Conclusion

The Republic of Korea has demonstrated its strong commitment to introducing competition in the telecommunications sector through its signature of the World Trade Organization Basic Telecom Agreement.

The entry of MAK Networks into the U.S. market will bring greater competition and services in the U.S. telecommunications sector. A grant of MAK Networks' application, therefore, will serve the public interest, convenience, and necessity.

Respectfully submitted,

MAK NETWORKS, INC.

BY: BENJAMIN YOON, CFO

JUNE 05, 2025