

ATTACHMENT 1

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:)
Intermountain Infrastructure Group, LLC)
Application Under Section)
214 of the Communications Act of 1934,)
As Amended, for Global or Limited Global) File No. _____
International Resale Authority)

Intermountain Infrastructure Group, LLC attests to its qualification for streamlined processing under 63.12 as follows:

Intermountain Infrastructure Group, LLC ("Applicant") is not a foreign carrier; however, it is affiliated with a foreign carrier in a destination market (Canada). Applicant nevertheless qualifies for streamlined processing pursuant to 47 CFR §63.12(c)(1)(ii), based on the following:

(a) The Applicant is affiliated with Travail Networks Canada Inc., a Canadian corporation. Travail Networks Canada Inc. is 100% owned by Intermountain Infrastructure Group, LLC. Travail Networks Canada Inc. holds a Non-Dominant Carrier license in Canada where it is authorized to provide facilities-based telecommunications services to the public. However, Travail Networks Canada Inc. does not yet provide any telecommunications services in Canada or elsewhere. Accordingly, it has 0% market share in the international transport and local access markets in Canada and therefore lacks sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market. The Applicant therefore qualifies for a presumption of non-dominance under 47 CFR §63.10(a)(3).

(b) The Applicant does not have an affiliation with a dominant U.S. carrier whose international switched or private line services Intermountain Infrastructure Group, LLC seeks authority to resell.

Intermountain Infrastructure Group, LLC responds to Question 12 of the Application and §63.18 (i), (j) (k), (l) and (m) as follows:

(i) Intermountain Infrastructure Group, LLC is affiliated with a foreign carrier, Travail Networks Canada Inc., which is authorized as a non-dominant carrier to provide telecommunications service in Canada.

(j) Intermountain Infrastructure Group, LLC seeks to provide international telecommunications services to Canada.

(k) Canada is a member of the World Trade Organization.

(m) Applicant satisfies the requirements of §63.10(a)(3) for a presumption of non-dominance and therefore qualifies for regulation as a non-dominant carrier for the provision of international telecommunication service to Canada. Travail Networks Canada Inc., the Applicant's affiliate, lacks sufficient market power in Canada to adversely affect competition in the U.S. market. As noted above, Travail Networks Canada Inc. has no telecommunications facilities or customers. Further, it does not provide local access services. Accordingly, Travail Networks Canada Inc. has 0% share of the international transport and local access markets in Canada. Accordingly, Intermountain

Infrastructure Group, LLC meets the standard for presumptive classification as non-dominant under §63.10(a)(3).