

**Iowa RSA 2 Limited Partnership**  
**FCC International Section 214 Application**  
**Attachment 1**

Iowa RSA 2 Limited Partnership (“RSA 2”), 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 resale carrier pursuant to the terms and conditions of Section 63.18(e)(2) of the Commission’s Rules to all foreign points as authorized by the Commission. 47 C.F.R. § 63.18(e)(2).

RSA 2 has no affiliation with any foreign carrier in any of the destination countries for which authority is requested, nor is RSA 2 affiliated with any dominant U.S. carrier whose services RSA 2 may resell. Thus, pursuant to Section 63.10(a)(1) of the Commission’s Rules, 47 C.F.R. § 63.10(a)(1), RSA 2 should be classified as a non-dominant carrier in its provision of international service on all routes.

Furthermore, as explained herein, this Application is entitled to streamlined processing under Section 63.12 of the Commission’s Rules, 47 C.F.R. § 63.12, as RSA 2 meets the criteria set forth therein:

- (1) RSA 2 is not affiliated with a foreign carrier;
- (2) RSA 2 does not have an affiliation with any dominant U.S. carriers whose international switched or private line services that RSA 2 seeks authority to resell;  
and
- (3) RSA 2 is not requesting authority to provide switched service over private lines to countries not previously authorized for service by the Commission.