

ONWAV INC.

Response to Question 10

OnWav Inc. (“OnWav”) respectfully seeks Special Temporary Authorization (“STA”) for the provision of resold international services pending grant of its application for permanent Section 63.18(e)(2) authorization, filed simultaneously herewith. OnWav has only recently come to understand that, unlike the “blanket” authority to provide domestic interstate services that arises under Section 63.01(a) of the Commission’s Rules, specific application for and grant of international authorization is required to provide international services. Prompt grant of the STA request would serve the public interest by allowing OnWav to continue uninterrupted international service to its small business customers.

OnWav only recently became aware that it was operating without international authorization. In the course of a due diligence review in contemplation of a proposed transfer of OnWav corporate control, no Section 214 International Authorization could be located, and further research indicated that international operations began in 2008 based on the good faith but unfortunately mistaken belief that no prior authorization was required. International service is provided as a convenience to OnWav customers, and constitutes, on average, less than 2 percent of revenues.

Until the proposed transaction initiated an independent regulatory review, OnWav had believed that it was operating in compliance with all regulatory obligations. Promptly upon confirming the fact of non-compliance, OnWav initiated the preparation of this application and its companion application for permanent authorization. OnWav acknowledges that the grant of this STA will not prejudice any action the Commission may take on the underlying application for permanent authorization, or the contemplated subsequent application seeking Commission consent to transfer of the authorization. OnWav further acknowledges that this STA can be revoked by the Commission on its own motion without a hearing.

Good cause exists for grant of the instant request. Grant would ensure that OnWav’s customers would not suffer inconvenience or loss of service, or otherwise be affected adversely. Having become aware of its oversight, OnWav is voluntarily attempting to take all steps necessary to rectify the situation as promptly as

PUBLIC INTEREST NETWORK SERVICES, INC.

Response to Question 10 (continued)

possible. Accordingly, OnWav submits that the public interest would be served by prompt grant of this request for STA.

Response to Question 16

Applicant OnWav has not previously been granted international Section 214 authority. Applicant seeks authorization to operate as a resale carrier pursuant to the terms and conditions of Section 63.18(e)(2) to resell the international services of authorized US common carriers for the provision of international switched, private line, data, television and business services to all international points, and to resell private lines for the purpose of providing international basic switched services to countries found to offer equivalent resale opportunities. Accordingly, Sections 63.18(e)(3) and 63.18(g) are not applicable.