

ATTACHMENT 1

Answer to Question 10:

Krush Communications, LLC ("Krush") and Agregato (USA) Inc. ("Agregato USA") (collectively the "Applicants"), pursuant to Section 214 of the Communications Act, as amended, 47 U.S.C. § 214, and Sections 63.04 and 63.24 of the Commission's Rules, 47 C.F.R. §§ 63.04, 63.24, respectfully request Special Temporary Authority ("STA") to allow Krush to continue to provide service to customers pending Commission approval of the parties' Joint Application for consent to the assignment of all of the assets of Krush to Agregato USA that are related to Krush's business as a provider of prepaid nationwide long distance services. Because Krush is already providing services to international customers, the Applicants respectfully request that the Commission grant this STA request as soon as possible.

Krush is a holder of domestic 214 "blanket" authorization and international 214 authorization.¹ Agregato USA is a recently formed Delaware corporation that intends on providing domestic and international long distance telecommunications services on a prepaid basis. Agregato USA is not registered to provide interstate telecommunications. Agregato USA is a wholly-owned subsidiary of Agregato Global Limited ("Agregato Global"). Agregato Global is owned by AGMO Holdings Pty Limited ("AGMO Holdings") and M2 Telecommunications Group Limited ("M2 Telecommunications").

On September 1, 2013, Agregato USA acquired all of the assets of Krush, including Krush's licenses, authorizations, customer accounts and receivables, customer and vendor contracts and agreements, equipment, and intellectual property. Applicants' failure to obtain Commission approval for the transfer of control was inadvertent. Applicants were not aware of their obligation under the Communications Act and the Commission's rules to obtain approval for the proposed transaction until consulting with Regulatory Counsel, and very much regret any inconvenience this filing may cause the Commission or its staff.

Grant of this STA request will serve the public interest. It will allow Krush to provide uninterrupted telecommunications services during the pendency of the assignment application before the FCC, thereby avoiding the loss of vital communications services by its customers. Further, as described more fully in the assignment application, allowing Krush to continue operations until such time as the application is approved will promote competition in the domestic and international communications services marketplace. Agregato USA will be able to provide Krush's customers with additional and advanced telecommunications services that will enhance the services they already receive. Finally, grant of the instant request will allow Applicants to come into compliance, and begin the formal wind-down process for Krush, thereby reducing the administrative burden on the Commission.

The Applicants acknowledge that grant of this STA request will not prejudice any action the Commission might take on the Joint Application, and the STA may be revoked by the Commission on its own motion and without a hearing. Applicants further acknowledge that grant of this STA request and the Joint Application will not preclude enforcement action.

¹ On November 29, 2007, Krush received an International Section 214 authorization for authority to provide global or limited global resale service. File No. ITC-214-20071106-00455.

Answer to Question 12:

Rule 63.18 (i):

As described above, Agregato USA acquired the assets of Krush, including Krush's licenses, authorizations, customer accounts and receivables, customer and vendor contracts and agreements, equipment, and intellectual property. As evidenced by the signature of its authorized representative to this filing, Krush certifies that Agregato USA is affiliated with foreign carriers as follows:

Foreign Carrier

Country

M2 Telecommunications Group Limited

Australia

Rule 63.18 (j) and Response to Question 13:

Krush certifies that Agregato USA, seeks to provide international telecommunications services to Australia. M2 Telecommunications Group Limited, a foreign carrier in Australia, owns 32% of Agregato USA's parent company, Agregato Global Limited.

Rule 63.18 (k):

Krush certifies that Australia is a Member of the World Trade Organization.

Rule 63.18 (l):

Krush certifies that it proposes to resell the international switched services of an unaffiliated U.S. carrier for the purpose of providing international telecommunications services to a country where it is affiliated with a foreign carrier. Pursuant to 63.18(l) and 63.10(a)(3), Krush certifies that it qualifies for a presumption of non-dominance for the route where Agregato USA has foreign carrier affiliations under Section 63.10(a)(3) of the Commission Rules, 47 C.F.R. § 63.10(a)(3), as M2 Telecommunications Group Limited, lacks a 50% market share in the international transport and local access markets on the foreign end of the route to Australia. With respect to all other routes, Agregato USA will have no foreign carrier affiliates.

Rule 63.18 (m):

For purposes of this application, Krush certifies that it qualifies for a presumption of non-dominance for the route where Agregato has foreign carrier affiliations under Section 63.10(a)(3) of the Commission Rules, 47 C.F.R. § 63.10(a)(3), as M2 Telecommunications Group Limited, lacks a 50% market share in the international transport and local access markets on the foreign end of the route to Australia. With respect to all other routes, Agregato USA will have no foreign carrier affiliates.

Answer to Question 16:

Rule 63.18(d):

Krush certifies that is has been authorized by the FCC to provide global or limited global resale service. File No. ITC-214-20071106-00455.

Rule 63.18(e)(3):

Not applicable.

Rule 63.18(g):

Not applicable.