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January 28, 2011

#### VIA ECFS AND IBFS

Marlene Dortch Secretary Federal Communications Commission 445-12th Street SW Washington, DC 20554

Re:

YourTel America, Inc.

Applications for Authority to Transfer Control of Company Holding

International and Blanket Domestic Section 214 Authority

WC Docket No. 11-11

IB File No. ITC-T/C-INTR2011-00102

Dear Ms. Dortch:

As requested by WCB staff, YourTel America, Inc., by its attorney, hereby provides the attached verifications to supplement its Applications.

Please contact the undersigned if you have any questions.

Sincerely,

DC01/GRIFJ/437323.1

I, Richard Yurich, am the trustee of the Jason G. Hirzel Trust Dated December 20, 2008, as amended and restated (the "Hirzel Trust"). I am authorized to represent the Hirzel Trust and its beneficiaries and affiliates and to make this verification on their behalf with respect to the Applications of YourTel America, Inc. ("YourTel") in WC Docket No. 11-11 and IB File No. ITC-T/C-INTR2011-00102.

- 1. The Hirzel Trust does not, at present, hold international Section 214 authority granted by the Federal Communications Commission ("FCC").
- 2. The Hirzel Trust (a) is not a foreign carrier and is not affiliated with a foreign carrier, and (b) will not become a foreign carrier or become affiliated with a foreign carrier as a result of the transaction described in the Applications.
- 3. The Hirzel Trust does not seek to provide international telecommunications services to any destination country where (i) the Hirzel Trust is a foreign carrier; (ii) the Hirzel Trust controls a foreign carrier; (iii) any entity that owns more than 25 percent of the Hirzel Trust, or that controls the Hirzel Trust, controls a foreign carrier; or (iv) two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of the Hirzel Trust and are parties to, or the beneficiaries of, a contractual relation affecting the provision or marketing of international basic telecommunications services in the United States.
- 4. The Hirzel Trust has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route, and will not enter into such agreements in the future.
- 5. The Hirzel Trust is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
- 6. With respect to the Hirzel Trust, the Application for authority to transfer control of YourTel as the holder of international Section 214 authority qualifies for streamlined treatment under Section 63.12(c) of the Commission's Rules because (i) the Hirzel Trust is not affiliated with a foreign carrier and will not become affiliated with any foreign carrier as a result of the proposed transaction; (ii) the Hirzel Trust is not affiliated with any dominant U.S. carrier whose international switched or private line services YourTel seeks authority to resell, nor will the Hirzel Trust become so affiliated as a result of the proposed transaction; and (iii) none of the other scenarios outlined in Section 63.12(c) of the Commission's Rules, 47 C.F.R. § 63.12, apply.
- 7. With respect to the Hirzel Trust, the Application for authority to transfer control of YourTel as the holder of domestic Section 214 authority is eligible for streamlined processing pursuant to Section 63.03(b)(2) of the Commission's Rules because (1) the proposed transaction will result in YourTel (including the Hirzel Trust and its affiliates, as that term is defined in Section 3(1) of the Act) having a market share in the interstate, interexchange market of less than

10 percent; (2) YourTel (including the Hirzel Trust and its affiliates) will provide competitive telephone exchange services or exchange access services exclusively in geographic areas served by a dominant local exchange carrier that is not a party to the transaction; and (3) neither YourTel, the Hirzel Trust, nor any of the Hirzel Trust's affiliates are regulated as dominant with respect to any service.

8. The statements made in the Applications and supplemental filings, except as otherwise specifically attributed, are true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Subscribed and sworn to before me this 27 day of January 2011.

May Sua Roanes

Mary Sue Reaves
Notary Public, State of Oklahoma
My Commission Expires
September 29, 2014

My Commission expires: 9/29/20/4

I, Jeffrey L. White, am the trustee of the Jeffrey L. White Revocable Trust dated September 1, 2010, as amended and restated (the "White Trust"). I am authorized to represent the White Trust and its beneficiaries and affiliates and to make this verification on their behalf with respect to the Applications of YourTel America, Inc. ("YourTel") in WC Docket No. 11-11 and IB File No. ITC-T/C-INTR2011-00102.

- 1. The White Trust does not, at present, hold international Section 214 authority granted by the Federal Communications Commission ("FCC").
- 2. The White Trust (a) is not a foreign carrier and is not affiliated with a foreign carrier, and (b) will not become a foreign carrier or become affiliated with a foreign carrier as a result of the transaction described in the Applications.
- 3. The White Trust does not seek to provide international telecommunications services to any destination country where (i) the White Trust is a foreign carrier; (ii) the White Trust controls a foreign carrier; (iii) any entity that owns more than 25 percent of the White Trust, or that controls the White Trust, controls a foreign carrier; or (iv) two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of the White Trust and are parties to, or the beneficiaries of, a contractual relation affecting the provision or marketing of international basic telecommunications services in the United States.
- 4. The White Trust has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route, and will not enter into such agreements in the future.
- 5. The White Trust is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
- 6. With respect to the White Trust, the Application for authority to transfer control of YourTel as the holder of international Section 214 authority qualifies for streamlined treatment under Section 63.12(c) of the Commission's Rules because (i) the White Trust is not affiliated with a foreign carrier and will not become affiliated with any foreign carrier as a result of the proposed transaction; (ii) the White Trust is not affiliated with any dominant U.S. carrier whose international switched or private line services YourTel seeks authority to resell, nor will the White Trust become so affiliated as a result of the proposed transaction; and (iii) none of the other scenarios outlined in Section 63.12(c) of the Commission's Rules, 47 C.F.R. § 63.12, apply.
- 7. With respect to the White Trust, the Application for authority to transfer control of YourTel as the holder of domestic Section 214 authority is eligible for streamlined processing pursuant to Section 63.03(b)(2) of the Commission's Rules because (1) the proposed transaction will result in YourTel (including the White Trust and its affiliates, as that term is defined in Section 3(1) of the Act) having a market share in the interstate, interexchange market of less than

10 percent; (2) YourTel (including the White Trust and its affiliates) will provide competitive telephone exchange services or exchange access services exclusively in geographic areas served by a dominant local exchange carrier that is not a party to the transaction; and (3) neither YourTel, the White Trust, nor any of the White Trust's affiliates are regulated as dominant with respect to any service.

8. The statements made in the Applications and supplemental filings, except as otherwise specifically attributed, are true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Subscribed and sworn to before me this <u>Z6</u> day of January 2011.

Notary Public

MATT SARTIN
Notary Public in and to the
SEAL
State of Okidhoma
Commission #10004799
BL My Commission expires 6/11/2014

My Commission expires: 6/11/2014

I am David A. Garza. I am providing this Verification for myself and not on behalf of YourTel America, Inc. ("YourTel"). I am providing this Verification with respect to the Applications of YourTel in WC Docket No. 11-11 and IB File No. ITC-T/C-INTR2011-00102.

- 1. I do not, at present, hold international Section 214 authority granted by the Federal Communications Commission ("FCC").
- 2. I am not a foreign carrier or affiliated with a foreign carrier, and I will not become a foreign carrier or become affiliated with a foreign carrier as a result of the transaction described in the Applications.
- 3. I do not seek to provide international telecommunications services to any destination country where (i) I am a foreign carrier; (ii) I control a foreign carrier; or (iii) I own more than 25 percent of an entity that controls a foreign carrier.
- 4. I have not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route, and will not enter into such agreements in the future.
- 5. I am not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
- 6. With respect to my interests in YourTel, the Application for authority to transfer control of YourTel as the holder of international Section 214 authority qualifies for streamlined treatment under Section 63.12(c) of the Commission's Rules because (i) I am not affiliated with a foreign carrier and will not become affiliated with any foreign carrier as a result of the proposed transaction; (ii) I am not affiliated with any dominant U.S. carrier whose international switched or private line services YourTel seeks authority to resell, nor will I become so affiliated as a result of the proposed transaction; and (iii) none of the other scenarios outlined in Section 63.12(c) of the Commission's Rules, 47 C.F.R. § 63.12, apply.
- 7. With respect to my interests in YourTel, the Application for authority to transfer control of YourTel as the holder of domestic Section 214 authority is eligible for streamlined processing pursuant to Section 63.03(b)(2) of the Commission's Rules because (1) the proposed transaction will result in YourTel (including me and my affiliates, as that term is defined in Section 3(1) of the Act) having a market share in the interstate, interexchange market of less than 10 percent; (2) YourTel (including me and my affiliates) will provide competitive telephone exchange services or exchange access services exclusively in geographic areas served by a dominant local exchange carrier that is not a party to the transaction; and (3) I am not regulated as dominant with respect to any service, nor is YourTel nor any of my affiliates.
- 8. The statements made in the Applications and supplemental filings, except as otherwise specifically attributed, are true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Subscribed and sworn to before me this 27 m day of January 2011.

Motory Public

RONALD L. MEDLIN Notary Public - Notary Seal State of Missouri Commissioned for Jackson County My Commission Expires: July 15, 2014 Commission Number: 10395982

My Commission expires: 7-15-2014

I, Jason Hirzel, am the trustee of the Richard Paul Yurich Revocable Living Trust dated June 11, 2008, as amended and restated (the "Yurich Trust"). I am authorized to represent the Yurich Trust and its beneficiaries and affiliates and to make this verification on their behalf with respect to the Applications of YourTel America, Inc. ("YourTel") in WC Docket No. 11-11 and IB File No. ITC-T/C-INTR2011-00102.

- 1. The Yurich Trust does not, at present, hold international Section 214 authority granted by the Federal Communications Commission ("FCC").
- 2. The Yurich Trust (a) is not a foreign carrier and is not affiliated with a foreign carrier, and (b) will not become a foreign carrier or become affiliated with a foreign carrier as a result of the transaction described in the Applications.
- 3. The Yurich Trust does not seek to provide international telecommunications services to any destination country where (i) the Yurich Trust is a foreign carrier; (ii) the Yurich Trust controls a foreign carrier; (iii) any entity that owns more than 25 percent of the Yurich Trust, or that controls the Yurich Trust, controls a foreign carrier; or (iv) two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of the Yurich Trust and are parties to, or the beneficiaries of, a contractual relation affecting the provision or marketing of international basic telecommunications services in the United States.
- 4. The Yurich Trust has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route, and will not enter into such agreements in the future.
- 5. The Yurich Trust is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
- 6. With respect to the Yurich Trust, the Application for authority to transfer control of YourTel as the holder of international Section 214 authority qualifies for streamlined treatment under Section 63.12(c) of the Commission's Rules because (i) the Yurich Trust is not affiliated with a foreign carrier and will not become affiliated with any foreign carrier as a result of the proposed transaction; (ii) the Yurich Trust is not affiliated with any dominant U.S. carrier whose international switched or private line services YourTel seeks authority to resell, nor will the Yurich Trust become so affiliated as a result of the proposed transaction; and (iii) none of the other scenarios outlined in Section 63.12(c) of the Commission's Rules, 47 C.F.R. § 63.12, apply.
- 7. With respect to the Yurich Trust, the Application for authority to transfer control of YourTel as the holder of domestic Section 214 authority is eligible for streamlined processing pursuant to Section 63.03(b)(2) of the Commission's Rules because (1) the proposed transaction will result in YourTel (including the Yurich Trust and its affiliates, as that term is defined in Section 3(1) of the Act) having a market share in the interstate, interexchange market of less than

10 percent; (2) YourTel (including the Yurich Trust and its affiliates) will provide competitive telephone exchange services or exchange access services exclusively in geographic areas served by a dominant local exchange carrier that is not a party to the transaction; and (3) neither YourTel, the Yurich Trust, nor any of the Yurich Trust's affiliates are regulated as dominant with respect to any service.

The statements made in the Applications and supplemental filings, except as 8. otherwise specifically attributed, are true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Subscribed and sworn to before me this \_\_\_\_\_\_ day of January 2011.

LISA INGLE
Notary Public, State of Oklahoma
Commission # 10010323
My Commission Expires December 13, 2014

My Commission expires:  $\frac{12-13-}{}$