

SIERRA TEL COMMUNICATIONS GROUP – VARCOMM-SIERRATEL, INC.
International Section 214 for Global Resale – Transfer of Control Application

Attachment 6
Response to Item 27

Neither Transferor Sierra Tel Communications Group nor Transferee Varcomm-SierraTel, Inc. nor Authorization Holder Sierra Telephone Long Distance: (a) is a foreign carrier; (b) controls, is controlled by, or is under common control with, a foreign carrier; (c) is affiliated with a foreign carrier; nor (d) will be affiliated with a foreign carrier upon consummation of the proposed transfer of control.

Hence, pursuant to Section 63.10(a)(1) of the Commission's Rules, Sierra Telephone Long Distance shall presumably be considered non-dominant both before and after the proposed transaction for the provision of resold international communications services on all routes because Sierra Telephone Long Distance is a United States carrier that has no affiliation with, and that itself is not, a foreign carrier in any particular country to which its underlying carrier(s) terminate the international toll calls that it resells.