

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

Attachment 8
Response to Item 29

The Applicants qualify for streamlined processing pursuant to Section 63.12 of the Commission's Rules because: (a) neither Transferor Sierra Tel Communications Group nor Transferee Varcomm-SierraTel, Inc. nor Authorization Holder Sierra Telephone Long Distance is affiliated with any foreign carrier in any destination market; (b) neither Transferor Sierra Tel Communications Group nor Transferee Varcomm-SierraTel, Inc. nor Authorization Holder Sierra Telephone Long Distance is affiliated with any dominant U.S. carrier whose international switched or private line services Sierra Tel Communications Group or Varcomm-SierraTel, Inc. or Sierra Telephone Long Distance seeks authority to resell; (c) neither Transferor Sierra Tel Communications Group nor Transferee Varcomm-SierraTel, Inc. nor Authorization Holder Sierra Telephone Long Distance seeks authority to provide switched basic services over private lines to any country (much less, to any country for which the Commission has not previously authorized the provision of switched services over private lines); and (d) neither Transferor Sierra Tel Communications Group nor Transferee Varcomm-SierraTel, Inc. nor Authorization Holder Sierra Telephone Long Distance has any reason to believe that the Commission will inform it in writing that this application is not eligible for streamlined processing.