

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

Attachment 9
Response to Item 30

Section 63.18(i): Transferor Sierra Tel Communications Group and Transferee Varcomm-SierraTel, Inc. and Authorization Holder Sierra Telephone Long Distance each certifies that it is not a foreign carrier, and that it is not affiliated with a foreign carrier.

Section 63.18(j): Transferor Sierra Tel Communications Group and Transferee Varcomm-SierraTel, Inc. and Authorization Holder Sierra Telephone Long Distance each certifies that it does not seek to provide international telecommunications services to any destination country for which any of the following is true: (a) it is a foreign carrier in that country; (b) it controls a foreign carrier in that country; (c) any entity that owns more than 25 percent of it, or that controls it, controls a foreign carrier in that country; or (d) two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of it and are parties to, or the beneficiaries of, a contractual relation (e.g., a joint venture or market alliance) affecting the provision or marketing of international basic telecommunications services in the United States.

Section 63.18(k): Transferor Sierra Tel Communications Group and Transferee Varcomm-SierraTel, Inc. and Authorization Holder Sierra Telephone Long Distance each certifies that it listed no country in response to Section 63.18(j).

Section 63.18(l): No required certification in paragraph.

Section 63.18(m): Transferor Sierra Tel Communications Group and Transferee Varcomm-SierraTel, Inc. and Authorization Holder Sierra Telephone Long Distance each certifies that it is not a foreign carrier and is not affiliated with any foreign carrier in any country.

Section 63.18(n): Transferor Sierra Tel Communications Group and Transferee Varcomm-SierraTel, Inc. and Authorization Holder Sierra Telephone Long Distance each certifies that it 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 that it will not enter into such agreements in the future.

Section 63.18(o): Transferor Sierra Tel Communications Group and Transferee Varcomm-SierraTel, Inc. and Authorization Holder Sierra Telephone Long Distance each certifies pursuant to Sections 1.2001 through 1.2003 of the Rules that no party to the application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. See 21 U.S.C. 853a.