#### Attachment A

## Standard Questions for an International Section 214 Authorization Application

# **Applicant:**

# FCC File Number(s):

**Purpose**: This list of standard questions solicits the initial information that the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (Committee) will review in connection with any referral of the above-referenced application by the Federal Communications Commission (FCC) in order to assess any national security and law enforcement concerns raised by the application. After review, the Committee may request additional information, including through tailored questions. The 120-day initial review period will typically start on the date the Chair of the Committee determines that your responses to these standard questions and any tailored questions, when required, are complete. If the Committee determines no tailored questions are necessary, the 120-day initial review period will start no more than 30 days after the FCC's referral, on the date the Committee informs the FCC that the responses to the standard questions are complete and that no tailored questions are required. If you fail to provide timely responses to any Committee requests for information, the Committee may recommend that the FCC dismiss the application without prejudice.

**Dissemination of Information**: The information received by the Committee pursuant to 47 CFR § 1.40003 and any subsequent requests for information by the Committee may be shared and used in accordance with Section 8 of Executive Order 13913 of April 4, 2020, Establishing the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector, 85 Fed. Reg. 19643 (Apr. 8, 2020).

## **Instructions**

- 1) Complete all Sections: When a "Yes" answer is indicated, provide further information as appropriate. The questions seek further details regarding the Applicant and its security-related practices, and some questions are particularly directed at identifying and assessing the complete scope of the equipment that the Applicant will be operating and the services the Applicant will be offering should the FCC grant those authorities. Accordingly, in answering the "Section V: Applicant's Services" questions and "Section VI: Applicant Services Portfolio Checklist and Reference Questions," the Applicants must file complete and accurate responses and identify all switches, routing equipment, and all services offered in retail markets.
- 2) Identify Sensitive Information: Specifically identify answers or documents for which a claim of privilege or confidentiality is asserted based on the information containing trade secrets or commercial or financial information. If there are multiple applicants, each applicant should also clearly mark any answers or documents that contain sensitive information that should not be disclosed to the other applicants. Personally Identifiable Information (PII) may be submitted in a separate attachment. The PII Supplement is Attachment G.
- 3) Response Format: Uniquely and sequentially Bates-number your responses to the standard questions, including any attachments, with an endorsement on each page. The Bates number must be a unique, consistently formatted identifier; the number of digits in the numeric portion of the format

should not change in subsequent productions, if any, nor should spaces, hyphens, or other separators be added or deleted. Produce any Excel documents in native format (if desired, you may also produce a PDF version for record keeping purposes).

- 4) Individuals' Names: For names that follow different naming conventions, such as the use of surnames as first names (e.g., Korean names), or the use of mother's last name as one of two last names that are often hyphenated (e.g., Spanish names), follow standard English convention for purposes of completing this information. For example, if the name is Kim Chul-su, write "Chul-su Kim" in the form. If the name in Spanish is Juan Garcia-Reyes, write "Juan Garcia Reyes."
- 5) Residential Addresses: Contract mail receipt locations, post office boxes, co-working, or shared virtual locations may not be used in lieu of residence addresses.
- **6) Business Addresses:** For each business address, clearly indicate whether the address is a shared business venue, co-working location, virtual office, or traditional physical office.
- 7) Obligation to Update: The Applicant must inform the Committee if there is any material change to any of the information provided in the Applicant's responses while the Committee's review is ongoing, including, but not limited to, changes in ownership, equipment, and Communications Assistance for Law Enforcement Act (CALEA) compliance.
- 8) **Definitions** These terms, as used in this questionnaire, have the following definitions:
  - A "Controlling Interest" is generally a 50% or greater Ownership Interest (either equity or voting). Also, a Controlling Interest shall be determined on a case-by-case basis considering the distribution of ownership, and the relationships of the owners, including family relationships. The term Controlling Interest includes Individuals or Entities with positive or negative de jure or de facto control of the Applicant/Licensee. De jure control includes holding 50% or more of the voting stock of a corporation or holding a general partnership interest in a partnership. Ownership Interests that are held indirectly by any party through one or more intervening corporations may be determined by successive multiplication of the ownership percentages for each link in the vertical ownership chain except that if the ownership percentage for an interest in any link in the chain is equal to or exceeds 50% or represents actual control, it may be treated as if it were a 100% interest. De facto control is determined on a case-by-case basis. Examples of de facto, or actual, control include constituting or appointing 50% or greater of the board of directors or management committee; having authority to appoint, promote, demote, and fire senior executives that control the day-to-day activities of the Licensee; or playing an integral role in management decisions. In the case of a consortium, each member of the consortium shall be considered to have a Controlling Interest in the consortium.
    - o "Ultimate Owner" and "Ultimate Parent" refer to the Entity or Individual that ultimately owns and controls the Applicant/Licensee.
    - "Immediate Owner" refers to the Entity or Individual in the vertical ownership chain that immediately owns and controls the Applicant/Licensee. In other words, the Immediate Owner is the Entity or Individual in the ownership chain that is closest to the Applicant/Licensee.
    - An Entity or Individual with an "Ownership Interest" is any Entity in the ownership chain with more than a 5% attributable interest in the Applicant/Licensee, including the "Ultimate Owner/Parent" and the "Immediate Owner," and all Controlling Interest holders. Note that Controlling Interests include *de facto* controlling interests, for which equity and/or voting ownership may be below 5%.

- "Corporate Officer" refers to any Individual hired or appointed by the Entity's board of directors
  that has actual or apparent authority to exercise day-to-day management responsibilities over an
  Entity.
- "Director" refers to any Individual serving on an Applicant's board of directors or similar governing body organized to set policies for corporate management of or oversight for an Applicant/Licensee.
- "Entity" includes a partnership, association, estate, trust, corporation, limited liability company, consortium, joint venture, governmental authority, or other organization.
- An "Equity Interest Holder" is any Individual or Entity that has the right to receive or the power to direct the receipt of dividends from, or the proceeds from the sale of, a share or other ownership stake in the Applicant.
- The term "Foreign Government" includes any person or group of persons exercising sovereign *de facto* or *de jure* political jurisdiction over any country, other than the United States, or over any part of such country, and includes any subdivision of any such group and any group or agency to which such sovereign *de facto* or *de jure* authority or functions are directly or indirectly delegated. Such term shall include any faction or body of insurgents within a country assuming to exercise governmental authority whether such faction or body of insurgents has or has not been recognized by the United States.
- "Individual" refers to a natural person, as distinguished from an Entity.
- "Managed Services" or "Enterprise Services" refers to the provision of a complete, end-to-end communications solution to customers.
- A "Non-U.S. Individual" is an Individual who is not a U.S. citizen.
- An "Owner" is an Individual or Entity that holds an Ownership Interest in the Applicant/Licensee.
- An "Ownership Interest" is a 5% or greater equity (non-voting) and/or voting interest, whether directly or indirectly held, or a Controlling Interest in the Applicant, and includes the ownership in the Ultimate Parent/Owner of the Applicant and any other Entity(ies) in the chain of ownership (i.e., all entities that exist in the ownership structure between the Applicant itself and its Ultimate Parent).
- "Remote Access" is access from a point that is not physically co-located with the Applicant's network facilities, or that is not at a point within the Applicant's network.
- "Senior Officer" refers to the Chief Executive Officer, President, Chief Financial Officer, Chief Information Officer, Chief Technical Officer, Chief Operating Officer, or any other similarly situated Individual that has actual or apparent authority to act on behalf of the Entity.

# **Section I: Identification of Applicant**

1) Provide the Applicant's name, address, principal place of business, and place of incorporation.

#### Section II: Applicant's Ownership

- 2) Identify each Individual or Entity that holds an Ownership Interest in the Applicant, specifically identifying any foreign Entities or Foreign Government-controlled entities, including the ultimate parent owner of the Applicant and any other Individuals/Entities holding an Ownership Interest in the chain of ownership.
  - a) For each such Individual or Entity with Ownership Interest in Applicant, include a clear explanation of its involvement in the Applicant, including whether it will have a management role.
  - **b)** For each such Individual or Entity with an Ownership Interest in Applicant, provide all identifying information, as follows:
    - i) For Individuals, provide the name (including all names and aliases used by that person), country of citizenship (indicate whether the individual is a dual citizen and all countries where citizenship is held), date and place of birth, U.S. alien number (indicate if individual is a U.S. Lawful Permanent Resident) and/or social security number (if applicable), passport identifying information (including number and country), all residence addresses, all business addresses and all phone numbers. Personally Identifiable Information (PII) may be provided in Attachment G, a PII Supplement.
    - ii) For Entities, provide country of incorporation (if the United States, include state of incorporation), principal place of business, general business type (e.g., holding company, investment firm, etc.), all business addresses, email addresses, and related phone numbers.

# **Section III: Applicant Details**

3)	Does the Applicant have existing (or planned) relationships/partnerships (formal or informal), funding or service contracts, directly or indirectly, with any foreign Individuals, foreign companies Foreign Governments, and/or any Foreign Government-controlled companies?  Yes  No
	If yes, indicate whether the relationship/partnership includes a management role by any foreign Individuals, foreign companies or Foreign Governments. Provide the name(s) of the foreign Individuals, foreign companies and Foreign Governments and explain the nature of the relationship/partnership, including whether the relationship/partnership currently exists and/or is intended to continue in the future.

4) Identify the total number of current employees, and planned number of employees for the Applicant for the next 12 months.

5)	Does the Applicant currently operate or plan to operate a website?  Yes No
	If yes, provide all URL addresses for any current or known future company websites and describe whether the information in the website is up to date.
6)	Has the Applicant, any Entity with an Ownership Interest in the Applicant, or any of the Applicant's Corporate Officers, Senior Officers or Directors been involved in bankruptcy proceedings, or any other legal proceeding undertaken for the purpose of liquidating, reorganizing, refinancing, or otherwise seeking relief from all or some of the Applicant's or its parent's debts, in any jurisdiction over the past 5 years?  Yes No
	If yes, provide details.
7)	Has the Applicant, any Corporate Officers, Senior Officers, Directors, or any Individual/Entity with an Ownership Interest in the Applicant ever been involved or associated with a previous application to the FCC?  Yes  No
	If yes, provide application identifying information.
8)	Has the Applicant, any Corporate Officers, Senior Officers, Directors, or any Individual/Entity with an Ownership Interest in the Applicant ever been involved or associated with a previous filing with the Committee on Foreign Investment in the United States (CFIUS)?  Yes No
	If yes, provide filing identifying information.
9)	Has the Applicant, any Corporate Officers, Senior Officers, Directors, or any Individual/Entity with an Ownership Interest in the Applicant ever been blocked, sanctioned, penalized, or had an authorization or other permission revoked/terminated by the FCC?  Yes No
	If yes, provide details.
10)	Has the Applicant, any Corporate Officers, Senior Officers, Directors, or any Individual/Entity with an Ownership Interest in the Applicant ever been blocked, sanctioned, penalized, or had an authorization or other permission prohibited, suspended, or revoked by CFIUS?  Yes No
	If yes, provide details.
11)	Has the Applicant, any Corporate Officers, Senior Officers, Directors, or any Individual/Entity with an Ownership Interest in the Applicant, ever been convicted of any felony (an offense carrying a

If yes to any of the above, describe in detail, including name(s) of Corporate Officers and Senior Officers involved, date(s), and current status or final disposition of matter, including any terms of settlement. Provide any available supporting documentation.

# **Section IV: Applicant Operations**

13)	Yes No No							
	If yes, answer the following:							
	a)	a) Provide separately for each year its gross revenue.						
	b)	Provide separately for each year the Cost of Goods Sold (COGS).						
	c) What was the total amount of COGS allocated for telecommunications equipment and service types?							
	d)	Describe the customer base of the Applicant (business, residential, carrier, enterprise).						
	e)	Describe, for all services provided to each category of customer (e.g., enterprise, residential, carrier, etc.):						
		i. Total number of subscribers;						
		ii. Total annual gross revenue for preceding fiscal year; and						
		iii. Percentage of total gross revenue per category of customer for preceding fiscal year.						
16)	clas	t all expected and actual Federal, state, and local government customers including pursuant to any ssified contracts and include a description of all services to be provided, or services that are rently being provided, to such customers.						

- 17) Name each of the Applicant's Senior Officers and Directors and for each provide the following:
  - a) Explain the nature and extent of each Senior Officer's or Director's involvement in the Applicant; and
  - b) Provide the countries of citizenship, date and place of birth, U.S. alien number (indicate whether the individual is a U.S. Lawful Permanent Resident) and/or social security number (if applicable), passport identifying information (including number and country), all residence addresses, all business addresses and all phone numbers. PII may be provided in Attachment G.
- 18) Identify the Senior Officer or employee (who is a U.S. citizen residing in the United States with an active security clearance or who is eligible to obtain one) who will be the Applicant's authorized law enforcement point of contact responsible for accepting and responding to requests or compulsory processes from U.S. law enforcement or other U.S. government agencies.
  - a) Explain the Individual's relationship to the Applicant and provide name, all countries of citizenship, date and place of birth, U.S. social security number, all passport identifying information (including number and country), all residence addresses, all business addresses and

all phone numbers. Also identify whether the Individual has an active U.S. Government security clearance. PII may be provided in Attachment G.

19) Identify whether, if required by law, regulation or license condition, the Applicant will report to the appropriate law enforcement agencies, immediately upon discovery:								
a) Any act of compromise of a lawful interception of communications?  Yes No								
	b)	Any unauthorized access to customer information and/or call-identifying information? Yes \[ \] No \[ \]						
	c)	Any artificially inflated or fraudulent call traffic detected on your network?  Yes No						
	d)	Any felony (an offense carrying a maximum potential sentence of a term of imprisonment of more than a year) conviction, U.S. or foreign, of the Applicant or its officers/directors, or any Individual/Entity Ownership Interest in the Applicant?  Yes  No						
	e)	Any act of unlawful electronic surveillance that occurred on its premises or via electronic systems under its control? Yes $\square$ No $\square$						
20)	asso	Il the Applicant store and/or maintain any U.S. communications content, transactional data, callociated data, billing records or other subscriber information?  S □ No □						
	If y	es, answer the following:						
	a)	Describe the types of records that will be stored.						
	b)	Provide all addresses of locations where such records will be stored and/or remotely accessed/managed via electronic systems.						
	c)	If any storage location differs from the Applicant's address, explain the general purpose of the location and its function within the Applicant's business.						
	d)	If any of the records will be accessible from outside the United States, explain where, how, and who will have access to them.						
	e)	Describe all physical/electronic security measures utilized for all locations/systems to protect the confidentiality of records.						
21)	Wil	ll any Non-U.S. Individual have access to one or more of the following:						
	Physical facilities and/or equipment under the Applicant's control?  Yes No							
		If yes, provide the identity of the Individual(s) and explain the type(s) of access that will be provided.						

<ul> <li>b) Customer records, including Customer Proprietary Network Information (CPNI), bil and Call Detail Records (CDRs)?</li> <li>Yes  No </li> </ul>		
		If yes, provide identity of the Individual(s) and explain the type(s) of access and records that will be provided.
	c)	Network control, monitoring, and/or auditing features?  Yes No
		If yes, explain the type(s) of access that will be provided, and how access will be logged and archived.
	d)	Electronic interfaces that allow control and/or monitoring of the infrastructure under the Applicant's control including, but not limited to, access to actual communications content and data?  Yes  No
		If yes, provide the identity of the Individual(s) and explain the type(s) of access and control that will be provided.
		For each Individual identified in response to these questions, provide the following information: name, countries of citizenship, date and place of birth, U.S. alien number and/or social security number (if applicable), passport identifying information (including number and country), all residence addresses, all business addresses, and all phone numbers. PII may be provided in Attachment G.
22)	con	nat access control/security policies (physical and cyber) are in place, or will be in place prior to immencing operations, for your network? If the policies exist and are available in writing, provide sies of these policies.
23)		nat encryption products/technologies have been installed on this network, or will be installed prior commencing operations?
24)	or r	es/will the Applicant have any screening and/or vetting procedures which will be applied to U.S. non-U.S. Individuals who have access, remote or otherwise, to the Applicant's communications work facilities, equipment, or data?  S \[ \bigcap \mathbf{No} \Bigcap \]
	If y	res, explain all such procedures.
25)	info rec	ntify whether, if required by law, regulation, or a license condition, the Applicant will orm the National Security Division (NSD) of the U.S. Department of Justice if, in the future, any ord storage/access location is transferred and/or newly established outside of the United States.  8 No
26)	ele	plain how the Applicant would make any and all records not stored in the United States etronically available in the United States within 5 business days pursuant to a lawful request to the horized law enforcement point of contact identified above.

27)	Des	scribe all lawful intercept capabilities of the Applicant and its Ownership Interest holders.					
28)	What, if any, outside capabilities via Remote Access will exist within the Applicant to control or monitor operations over the network (e.g., audit mechanisms, record access monitoring)?						
29)	Do/will any third-party Individual or Entity have Remote Access to the Applicant's network, systems, or records to provide Managed Services?  Yes No						
	If y	es, provide a detailed explanation.					
Sec	tion	V: Applicant's Services					
30)	ope	vide a general summary of the nature of the Applicant's current and planned services and erations, including an explanation of the Applicant's intended overall business model and its ationship with any sister and/or partner companies.					
31)	Wh	y is the Applicant seeking an FCC Authorization?					
32)	nety leas mal	vide all addresses of the present and anticipated physical locations for all of the Applicant's work equipment, data centers, and infrastructure, advise whether they are owned or leasedif sed, provide details of the owner(s) and a list of goods/services the owner(s) providesand the ke and model of the primary equipment used, including, but not be limited to, the portions of the work covered below:					
	a)	Describe the carrier transport facilities (e.g., T1, DS3, Optical Carrier) that will enable customer data flow into and out of owned and/or leased equipment.					
	b)	Will the Applicant be operating any physical and/or virtual telecommunications switching platforms (e.g., TDM and/or VoIP switches)?  Yes  No					
		If yes, provide a network architecture diagram that shows all switches and connection points.					
	c)	Provide a description of any other intended network equipment and/or proposed infrastructure (e.g., routers, media gateways, multiplexing/cross-connect facilities, signaling devices, data centers, other equipment).					
	d)	Does the Applicant have a network topology map that shows its Points of Presence (POPs), Network Operation Centers (NOC), and other network elements?  Yes  No					
		If yes, attach to your response.					
	e)	Is the Applicant or its affiliates or anyone else able to control operations at any POP and/or NOC from any overseas locations?  Yes  No  No					
		If yes, describe the nature of the foreign-based control, where it is, who has the control, and how?					

	3) Will the Applicant use interconnecting carriers and/or peering relationships?  Yes No							
	If yes, provide details and list the carriers.							
	4) Will the Applicant rely on underlying carrier(s) to furnish services to its customers and/or resell any services?  Yes  No							
	If yes, provide details and list whose services and wh	at se	rvices will be resold.					
35)	In what manner will services be delivered to custome	rs?						
,	Does/will the Applicant serve any sectors of U.S. crit <b>Yes</b> No I	ical	infrastructure?					
I Sec	a. Defense Industrial Base b. U.S. Intelligence Community c. Emergency Services (i.e., Federal, state, local law enforcement, fire, police) d. Government Facilities (i.e., Federal, state, local entities) e. Banking and Finance f. Nuclear Reactors, Materials, or Waste g. Drinking Water and Water Supply h. Energy  tion VI: Applicant Services Portfolio Checklist and policant intends to provide in the United States only.  vided outside the United States.	ypes	National Monuments Transportation Postal Shipping Dams Other (explain in detail)  ference Questions					
Eor	and absolved have (1) provide a capacita and full a	vnla	nation at the and of this questionnaire and					

For each checked box: (1) provide a **separate and full explanation** at the end of this questionnaire and (2) answer the Reference Questions below the table regarding the services you have indicated in the checklist.

PROPOSED SERVICES					
VoIP (Voice over Internet Protocol)					
POTS (Plain Old Telephone Service)					
TDM (Time Division Multiplexing)					
Voicemail					
PBX (Private Branch Exchange)					
Centrex (Hosted/Managed PBX)					
Callback Service					

Calling Card	ı [					
Dial Tone Service						
Issue DID (Direct Inward Dial) Local Telephone Numbers						
Local Exchange Service						
Local Toll Service						
Domestic/International Long Distance (Interexchange Service)						
Tollfree Service						
IVR (Interactive Voice Response)						
Conference Calling						
Operator Service						
Directory Assistance						
Dial Around Service (1010XXX Casual Calling)						
Switched Access						
Special Access (Dedicated Line)						
Mobile Top Up/Reload Services						
Mobile Network Operator Services (MNO)						
Mobile Virtual Network Operator Services (MVNO)						
Automatic Call Distribution (ACD)						
Other						
Data/Private Line						
ISP (Internet Service Provider)						
VPN (Virtual Private Network)		司				
Web Hosting						
LAN (Local Area Network)						
WAN (Wide Area Network)						
ISDN (Integrated Services Digital Network) BRI (Basic Rate Interface)						
ISDN PRI (Primary Rate Interface)						
DSL (Digital Subscriber Line)						
Frame Relay						
Email						
International Voice/Data Service						
Wireless/Mobile Voice/Data Services						
Satellite Services						
RF (Radio Frequency), Microwave						
Video						
Cloud Services						
Other						
Routing, Signaling Services						
Transport Facilities						
Leased Lines						
Collocation Services						
Other	. [					

## **Reference Questions:**

Instructions: Answer each question below as it relates to each of the services selected in the above table.

- a) In what manner will the service(s) be delivered to your customers?
- **b)** What kind of network infrastructure will be utilized to deliver the service(s)?
- c) What equipment (manufacturer, make and model) and software version will be utilized to provide the service(s)? Will the software be regularly updated?
- d) Will the service(s) be facilities-based, resold, or both? Describe in detail.
- e) Are you planning to implement and deploy 5G? If so, describe the plans, approach, anticipated services, and the intended vendors.

## **WARNING**

If an Applicant knowingly and willfully (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact; (2) makes any materially false, fictitious, or fraudulent statement or representation; or (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry, the Applicant may be subject to prosecution under Title 18, United States Code, Section 1001. The FCC may also terminate, revoke, or render null and void any license or authorization granted in this matter if any responses provided are false or intentionally misleading.

## **Applicant Certification**

Pursuant to	Title 28,	United States	Code, Sect	on 1746,	I, an authorize	d representative	of the Applicant,
declare und	er penalty	y of perjury th	at the foreg	oing is tru	e and correct t	o the best of my	knowledge.

Executed this	day of	, year of	·	
Representative Name:				
Representative Title: _				
Representative Signatu	re:			