

10 FCC Rcd 12159, *; 1995 FCC LEXIS 6016, **;
1 Comm. Reg. (P & F) 647

In the Matter of Domtel Communications, Inc. Application for Authority to provide Direct Service between the United States and the Dominican Republic

File No. I-T-C-93-246

RELEASE-NUMBER: FCC 95-377

FEDERAL COMMUNICATIONS COMMISSION

10 FCC Rcd 12159; 1995 FCC LEXIS 6016; 1 Comm. Reg. (P & F) 647

September 11, 1995 Released; Adopted August 23, 1995

ACTION:

[**1] MEMORANDUM OPINION, ORDER, AUTHORIZATION AND CERTIFICATE

JUDGES: By the Commission

OPINION:

[*12159] 1. With this order we allow a new carrier facilities-based entry into the U.S. international telecommunications market. Specifically, we authorize Domtel Communications, Inc. ("Domtel") to acquire and operate U.S. international facilities to provide message telephone, data, video and private line services between the United States and various foreign countries, including the Dominican Republic. Domtel will be regulated as a nondominant carrier and will correspond in the Dominican Republic with its parent, Telepuerto San Isidro, S.A. d/b/a/ Tricom, a Dominican carrier. We believe Domtel's entry will increase competition in the U.S. and Dominican Republic markets and thus benefit U.S. consumers.

Background

2. Domtel is a Delaware corporation wholly owned by Tricom. n1 Tricom is incorporated and operating in the Dominican Republic under a license issued by the Dominican Government to provide all services, including international message telephone service, private network services, data, video, cellular and local exchange services. n2

n1 Motorola owns 40 percent of Tricom. See Amendment to Domtel Application dated October 18, 1991.

[**2]

n2 See Domtel Application at 1-2, 4-6.

3. Domtel wishes to route traffic to and from PanAmSat Corporation's ("PAS") international teleport at Homestead, Florida. Traffic will be transmitted between earth stations authorized to communicate with the PAS - 1 satellite by means of a T-1 half circuit. Tricom, Domtel's Dominican correspondent, will arrange for transmission between PAS-1 and Tricom's facilities in the Dominican Republic. n3 Domtel requests Section 214 authority n4 to provide service from the United States to the Dominican Republic as well as to points beyond in conjunction with its Dominican correspondent Tricom. Domtel also requests that it be regulated as a nondominant international carrier.

n3 Id. at 1-2, 4.

n4 See 47 C.F.R. § 214.

4. We placed Domtel's application on Public Notice on July 14, 1993. n5 AT&T filed a petition to deny, and GTE filed opposing comments. Letters supporting the grant of this application were submitted by the Honorable Jose Del Carmen Ariza, Dominican Ambassador to the United States, and the Honorable Leopoldo Nunez Santos, Director General of Telecommunications of the Dominican Republic.

n5 See Report No. 6826.

5. Domtel [**3] amended its application on June 6, 1995, to request authority to: (1) lease an additional 1.544 Mbps circuit from PAS for service between the United States and the Dominican Republic; (2) lease from COMSAT and operate one 1.544 Mbps circuit via INTELSAT satellites for the countries listed in Appendix A to this order; and (3) to lease or acquire on an Indefeasible Right of User ("IRU") basis a one-half interest in, and operate, one 1.544 Mbps cable circuit to each of the countries listed in Appendix B via the specified common carrier cables.

Discussion

A. Domtel's Section 214 Application

6. AT&T asserts that the Commission should not grant Domtel's application to enter the U.S. market until the Commission determines, after conducting a factual investigation that comparable market access for all U.S. firms is available in the Dominican Republic. n6

n6 AT&T Petition at 1-3; AT&T Reply at 4 - 5. AT&T also maintains that any grant of authority to Domtel should be conditioned on Tricom's agreement to establish non-discriminatory, cost-based accounting rates with all U.S. carriers. AT&T Petition at 2, n.2; AT&T Reply at 5, n. 16. See *infra* at P 16.

7. In reply, Domtel [**4] maintains that AT&T offers no legal support for its position that a Commission finding of comparable market access in the Dominican Republic should precede a grant of its application. n7 Domtel further asserts that Dominican law imposes no restriction on a foreign-owned carrier's ability to provide service between the Dominican Republic and the United States, as demonstrated by the fact that all carriers providing telecommunications service in the Dominican Republic are at least one-third U.S.-owned. n8 Domtel also contends that, contrary to Section 63.52(c) of the Commission's rules, AT&T: (i) fails to provide facts demonstrating that grant of Domtel's application would be *prima facie* inconsistent with the public interest; and (ii) fails to state its interest in Domtel's application. n9

n7 Domtel Opposition at ii, 5, 9.

n8 See *id.* at 8 - 9. Domtel states that the Dominican Republic's "virtual monopolist" (Codotel) with which AT&T currently corresponds is 100 percent U.S.-owned (by GTE). AT&T's second correspondent in the Dominican Republic, All America Cable & Radio (AAC&R), is one-third U.S.-owned. See also Letter dated February 23, 1995 from Jose Del Carmen Ariza, Dominican Ambassador to the United States, to Reed Hundt, Chairman, FCC at 1 (Ariza Letter). And, as noted, Tricom is 40% owned by Motorola. See fn.1.

[**5]

n9 Domtel Opposition at ii, 7.

8. We deny AT&T's request that we make a finding of comparable market access before granting Domtel's application. Our action on this application is properly based [*12160] on the criteria we have previously applied in ruling on applications of foreign carriers to enter the U.S. telecommunications market as facilities-based carriers. Indeed, since the filing of AT&T's petition to deny we have initiated a proceeding to examine the policies governing foreign carrier entry in the U.S. telecommunications market in which we declined to propose AT&T's "comparable market access" standard as a method of regulating entry. n10 We tentatively concluded, however, that an important element of our public interest analysis should be effective market access for U.S. carriers in the primary international telecommunications markets served by the carrier desiring entry. This proposed standard, like our current approach, permits entry even absent effective market access for U.S. carriers where the applicant demonstrates that other public interest factors warrant its entry into the U.S. market.

n10 See *Market Entry and Regulation of Foreign-affiliated Entities, Notice of Proposed Rulemaking, 10 FCC Rcd 4844, 4860 (1995)* (Foreign Carrier Entry NPRM).

[**6]

10 FCC Rcd 12159, *; 1995 FCC LEXIS 6016, **;
1 Comm. Reg. (P & F) 647

9. We currently examine applications filed by foreign carriers or their U.S. affiliates for international Section 214 authority on a case-by-case basis. We balance our policy in favor of open entry against the potential for undue discrimination by the foreign carrier against unaffiliated U.S. carriers. The potential for such discrimination occurs when foreign carriers are permitted to offer end-to-end service in competition with U.S. carriers that must interconnect with them on the foreign end in order to complete U.S. international calls.

10. We have authorized several foreign carriers to acquire interests in U.S. international facilities subject to safeguards to protect U.S. carriers providing international service from discrimination. n11 In these cases, we found that nondiscrimination safeguards were sufficient to protect U.S. carriers in their provision of U.S. international service from discrimination that might occur as a result of such entry. We also found that the balance of public interest considerations favored granting the applications.

n11 See, e.g., *Telefonica Larga Distancia de Puerto Rico*, 8 FCC Rcd 106 (1992) (TLD); *AmericaTel Corporation* 9 FCC Rcd 3993, 3997 - 4002 (1994) (AmericaTel); *MCI Communications Corporation, British Telecommunications plc*, 9 FCC Rcd 3960, 3969 (1994) (BT/MCI).

[**7]

11. In these recent authorizations, we found our nondiscrimination safeguards sufficient in part either because of the competition and regulation that existed in the foreign carriers' home markets, or because the authority we granted was limited in scope. These circumstances offset the fact that, in each case, the applicant's foreign carrier affiliate was the incumbent service provider in the foreign market.

12. Here, Tricom is a recent entrant in the Dominican telecommunications market and appears not to have market power in any geographic or product market. Therefore, the risk of anticompetitive effects in the U.S. telecommunications market from Domtel's entry as a facilities-based carrier on the U.S.-Dominican Republic route appears minimal. Moreover, any such risk is readily controlled by our rules and the nondiscrimination safeguards that we impose as a condition of this authorization.

13. The Dominican telecommunications market, according to Domtel, has been dominated for more than sixty years by Codetel, the principal provider of Dominican telecommunications services. Domtel proffers statistics showing a wide disparity between the number of lines, employees, and facilities [**8] operated by Tricom and those employed by Codetel. n12 According to Domtel's opposition, at the time its application was filed, Tricom had four central offices and had less than a 3 percent market share in all the services it is authorized to provide. Tricom now estimates that it has 15 to 18 percent of the outbound minutes to the United States, while having less than 1 percent of the market for local traffic. n13 The record also reflects that Tricom has encountered formidable obstacles in its dealings with Codetel, and has established and expanded its presence only with difficulty. n14 For example, only upon passage of Resolution 94-003, Dominican legislation that requires Codetel to interconnect with other carriers, was Tricom finally able to reach an interconnection agreement with Codetel. n15 Tricom's relatively small market share and evidence of its difficulties competing with Codetel persuade us that Tricom lacks market power in the Dominican Republic.

n12 Domtel presents the following comparative statistics: in 1992, Codetel had 8000 employees; Tricom had 240; Codetel had 91,000 main business lines; Tricom had 1640; Codetel had 360,500 residential lines; Tricom had 97; Codetel had 4543 cellular telephones; Tricom had 1200; Codetel had 3900 PBX and key systems; Tricom had 125; Codetel had 2600 international circuits; Tricom had 96. See Domtel Opposition at 11.

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n13 See Letter dated June 6, 1995 from Judith O'Neil, Counsel for Domtel, to Susan O'Connell, Roxanne McElvane, International Bureau, FCC (Domtel Letter).

n14 See, e.g., Ariza Letter at 1; Letter dated December 13, 1994 from Leopoldo Nunez Santos, Director General of Telecommunications, the Dominican Republic, to Reed Hundt, Chairman, FCC at 1 - 2 (Santos Letter). For example, although Tricom began providing service in 1990, it took roughly four years to obtain an interconnection agreement with Codetel. See Domtel Letter at 3. See also Domtel Opposition at i, ii, 10.

n15 See Domtel Letter at 3.

14. The Dominican Government's efforts to facilitate competitive entry bolster our conclusion that Tricom lacks market power and that Domtel's provision of end-to-end service with Tricom poses a minimal risk of anticompetitive effects in the U.S. market for international services. The record reflects that the Dominican government is taking direct action to facilitate competitive entry into the Dominican telecommunications market by reducing regulatory and other barriers to entry. According to the Director General of Telecommunications for the Dominican Republic, the Dominican [**10] government allows subsidiaries of U.S. telecommunications companies to operate in the Dominican Republic. n16 Tricom is now one of four carriers, each partially or wholly U.S.-owned, that are licensed by the Director General of Telecommunications to provide telecommunications services in the Dominican Republic, including international facilities-based services. The Dominican Ambassador to the United States has declared that his government is committed to the principles of competition. n17 As noted above, Resolution 94-003 should make it easier for new carriers to enter the market. Despite this progress, it still appears that competitive safeguards in the Dominican Republic are less extensive than in most other [*12161] countries whose carriers we have authorized to acquire interests in U.S. international facilities. Due to Tricom's apparent lack of market power in the Dominican Republic, and the government's progress in facilitating competitive entry, we are nonetheless satisfied that, properly conditioned, grant of Domtel's application will not present a substantial risk of anticompetitive effects in the U.S. market for international services.

n16 See Santos Letter at 1.

[**11]

n17 See Ariza Letter at 1.

15. Balanced against this minimal risk of competitive harm are a number of public interest benefits that support grant of Domtel's application. We anticipate that this action will create procompetitive benefits in the U.S. international telecommunications market. The addition of another facilities-based carrier originating or terminating U.S. international voice, data and video services on the U.S.-Dominican Republic route should foster lower prices and increased service choices for U.S. consumers. By the same token, permitting Tricom and Domtel to operate end-to-end between the United States and the Dominican Republic may have a beneficial impact on competition in the Dominican Republic. Domtel may be willing to provide service in correspondence with Tricom on terms that Tricom could not otherwise obtain from unaffiliated U.S. carriers, which may lack the incentive to correspond with a new entrant such as Tricom. The U.S. settlement payments deficit with the Dominican Republic also may improve to the extent Tricom can operate more efficiently, reduce its calling prices to Dominican customers, and stimulate outbound traffic to the United States. n18 [**12] Grant of Tricom's application also may encourage other foreign countries to open their telecommunication markets to competition.

n18 For example, in 1993 U.S. carriers billed their customers for 192.9 million minutes more than Dominican carriers billed their customers. As a result, the net settlement payment by U.S. carriers to Dominican carriers was \$ 121.7 million.

Requirement of Cost-based Accounting Rates

16. AT&T requests that we condition any grant of authority to Domtel on Tricom's agreement to establish nondiscriminatory, cost-based accounting rates. Domtel states that the Commission has previously refused to impose such a condition. n19 Domtel also contends that, because Tricom is not dominant in the Dominican Republic, or in any other market, there is no danger of discriminatory accounting rate practices. n20 GTE likewise opposes the imposition of any such condition, asserting that accounting rates should be established through voluntary negotiation by the carriers. n21

n19 As examples of cases in which the Commission declined to impose this condition, Domtel cites Ameri-
caTel; TLD; and *Atlantic TeleNetwork, Inc.*, 6 FCC Rcd 6529 (1991). See Domtel ex parte Letter dated January
27, 1995 at 2 - 4.

[**13]

n20 See id. at 2.

n21 See Letter dated January 27, 1995 to Susan O'Connell, International Bureau, from James Hobson, Counsel for GTE.

17. We have in all prior cases denied AT&T's request that we require cost-based accounting rates as a condition of foreign carrier entry. In these orders, we stated that we would rely on mechanisms other than conditioning Section 214 authorizations to encourage foreign correspondents to lower their accounting rates with U.S. carriers. n22 We also observed in *AmericaTel* and in the Foreign Carrier Entry NPRM that accounting rates should drop as a natural consequence of foreign market competition. n23 For this reason, we did not propose in that rulemaking to adopt AT&T's suggestion that we condition foreign carrier entry on cost-based accounting rates. n24 The market liberalization underway in the Dominican Republic, and Tricom's apparent lack of market power, further bolster our conclusion that, in this case, we should rely on other mechanisms to achieve our goal of nondiscriminatory, cost-based accounting rates. Domtel's authorization, however, is of course subject to any regulatory requirements that we may adopt in any relevant proceeding [**14] of general applicability.

n22 See *TLD*, 8 FCC Rcd at 112 (citing *Second Report and Order and Second Further Notice of Proposed Rulemaking*, 7 FCC Rcd 8040, 8041 (1992)). See also *AmericaTel*, 9 FCC Rcd at 4003.

n23 *AmericaTel*, 9 FCC Rcd at 4003; Foreign Carrier Entry NPRM, at 4860.

n24 In the Foreign Carrier Entry NRPM we did propose to require that any affiliated, facilities-based carrier regulated as dominant on any U.S. international route for the provision of switched services file with the Commission a complete list of the accounting rates that its foreign carrier affiliate maintains with all other countries. See Foreign Carrier Entry NRPM at 4878.

Other Alleged Defects in Domtel's Application

18. Finally, GTE asserts that Domtel has either omitted or insufficiently addressed certain information required by Section 63.01 of the Commission's regulations. n25 According to GTE, Domtel has not described how it proposes to route traffic to and from the PAS earth station it will use at Homestead, Florida, or how Tricom will connect to satellite facilities in the [**15] Dominican Republic. GTE also contends that the application lacks the required estimates of revenues and costs called for by Section 63.01(m). GTE concludes that the Commission should decline to grant Domtel's application until it complies with the rules. n26

n25 See 47 C.F.R. § 63.01. GTE comments at 3. See also GTE Reply at 3 (Domtel has not provided all the information required by 63.01 (h - k)).

n26 GTE Reply at 2 - 4, 6.

19. In reply, Domtel states that its application contains not only the information specified by Section 63.01 and all of its subsections, but considerably more information than is contained in most applications granted by the Commission. n27 Upon examining Domtel's application, we do not find the application to be deficient. There is sufficient information upon which to base a grant.

n27 Domtel Opposition at 14.

B. Regulatory Status of Domtel

20. Both AT&T and GTE contend that Domtel failed to support its request to be regulated as a nondominant carrier because Domtel failed to demonstrate that Tricom lacks the ability to discriminate against unaffiliated U.S. carriers. n28 AT&T asserts that Tricom provides private line and switched services [**16] throughout the Dominican Republic and with foreign correspondents via local exchange facilities it owns in the Dominican Republic. According to GTE, this network is composed of cellular telephone units and wire, and a teleport completely independent of the Codetel net-

work. n29 Furthermore, GTE alleges, Tricom operates [*12162] 24 calling centers and 6 "agencies" -- facilities resembling calling centers but located in commercial establishments. GTE contends that Tricom can use these facilities to segregate its traffic in favor of Domtel. n30 AT&T and GTE conclude that Domtel must demonstrate that Tricom's facilities serving these commercial segments, particularly those being used for private line services, are not potential bottlenecks which could be used to discriminate against other U.S. international carriers serving the Dominican Republic. n31

n28 AT&T Petition at 3; GTE Comments at 2.

n29 GTE Reply at 2.

n30 In particular, GTE believes that Tricom would have the potential to discriminate in favor of Domtel on routing of northbound traffic from the Dominican Republic into the United States. *Id.*

n31 AT&T urges the Commission to ask Domtel to supplement its filing to clarify: (a) whether Tricom provides service between the Dominican Republic and the United States; (b) the volume of such service; (c) its U.S. correspondents; (d) its accounting rates; and (e) if applicable, how Tricom is providing service between the Dominican Republic and the United States without a U.S. correspondent. See AT&T Petition 4 - 5. See also AT&T reply at 5, n. 15. Our rules require that Tricom's U.S. correspondents, not Tricom, submit the information that AT&T requests. See 47 C.F.R. §§ 43.51, 43.61, and 64.1001 (1994). Domtel has stated for the record, however, that Tricom has signed operating agreements with several U.S. carriers and that its market share of outbound minutes to the United States has reached 15 to 18 percent. We find that Domtel has submitted sufficient information for us to determine its regulatory status. See C.F.R. § 63.10 (1994). See also *infra* P22.

[**17]

21. Domtel states that it meets the requirements for a finding of nondominance under Regulation of International Common Carrier Services n32 because Tricom does not control any bottleneck services or facilities in the Dominican Republic and therefore lacks any ability to discriminate against unaffiliated U.S. international carriers through control of such facilities. n33 Moreover, Domtel states, Tricom is patently unable and unwilling to discriminate against unaffiliated U.S. international carriers through such means as preferential operating agreements, preferential routing of traffic, exclusive or more favorable transiting agreements, or preferential domestic access and interconnection arrangements. Domtel also maintains that Tricom is open to negotiating an operating agreement with any U.S. carrier, has no history of discrimination, and has no incentive to direct all of its traffic to Domtel since Domtel does not have the significant market share that other U.S. carriers possess. n34

n32 *Report and Order, 7 FCC Rcd 7331 (1992).*

n33 See Domtel Application at 1 - 2, 4 - 7.

n34 See Domtel Application at 6; Domtel *ex parte* letter at 4 - 5; Domtel Opposition at 14.

[**18]

22. Pursuant to Section 63.10(a)(3) of the Commission's rules, n35 Domtel bears the burden of submitting information sufficient to demonstrate that Tricom lacks the ability to discriminate against unaffiliated U.S. carriers through control of bottleneck services or facilities in the Dominican Republic. Domtel's discussion of Tricom's market share and our findings in Section A on this issue are directly relevant to this showing. n36 Tricom provides local exchange, long distance, IMTS, private network, data, video and cellular services and targets the major commercial areas in Santo Domingo. It does not appear from the record, however, that Tricom is the sole provider of telecommunications service in any area of geographic significance in the Dominican Republic. Moreover, the government does not grant exclusive franchises for any telecommunications service. While Tricom has made progress in gaining market share of international long distance revenues, n37 its share of the market is still small relative to Codetel's. These facts, coupled with the Dominican government's efforts to reduce regulatory and other barriers to entry, makes it unlikely that Tricom has the ability to engage in [**19] discrimination or successfully sustain any facility as a bottleneck. Further, as a new en-

trant in need of increased traffic, Tricom has strong incentives to avoid discrimination and correspond with other U.S. carriers. Consequently, we will not regulate Domtel as a dominant carrier. n38

n35 47 C.F.R. § 63.10(a)(3).

n36 See supra P 13.

n37 See id.

n38 We nevertheless reserve the right to revisit Domtel's regulatory status at a later date in the remote circumstance that Tricom in the future obtains bottleneck facilities in some area which could enable it to discriminate against unaffiliated U.S. carriers.

Ordering Clauses

23. Accordingly, IT IS ORDERED, that application File No. I-T-C-93-246 IS GRANTED, and Domtel Communications, Inc. ("Domtel") is authorized to:

- a. lease from Comsat and operate one 1.544 Mbps circuit between appropriately licensed U.S. earth stations and INTELSAT satellites, connecting with similar facilities between the satellites and the points listed in Appendix A, furnished by its correspondents;
- b. lease or acquire on an Indefeasible Right of User ("IRU") basis a one-half interest in, and operate, one 1.544 Mbps cable circuit [**20] to each of the countries listed in Appendix B via the specified common carrier cables;
- c. lease capacity in U.S. earth stations authorized to communicate with INTELSAT satellites;
- d. lease necessary domestic connecting facilities; and
- e. use the facilities set forth in the foregoing subparagraphs to provide international message telephone, data, video and private line services between the United States and the points specified in Appendices A and B; and
- f. lease and operate two 1.544 Mbps circuits between appropriately licensed U.S. earth stations and the PAS-1 satellite, connecting with similar circuits between the satellite and the Dominican Republic, furnished by its correspondent;
- g. lease capacity in U.S. earth stations authorized to communicate with the PAS-1 satellite; and
- h. use the facilities set forth in subparagraphs d., f., and g. to provide international message telephone, data, video and private line services between the United States and the Dominican Republic and beyond to the points listed in Appendices A and B.

[*12163] 24. IT IS FURTHER ORDERED that neither Domtel nor any persons or companies directly or indirectly controlling or controlled [**21] by Domtel, or under direct or indirect common control with it, shall acquire or enjoy any right, for the purposes of handling or interchanging traffic to or from the United States, its territories or possessions, which is denied to any other United States carrier by reason of any concession, contract, understanding, or working arrangement to which Domtel or any persons or companies controlling or controlled by Domtel are parties. See also 47 C.F.R. § 63.14.

25. IT IS FURTHER ORDERED that our authorization of Domtel to provide private lines as part of its authorized services is limited to the provision of such private lines only between the United States and the countries listed in the

Appendices -- that is, private lines which originate in the United States and terminate in one of the countries listed in the Appendices, or which originate in one of the countries listed in the Appendices and terminate in the United States. In addition, Domtel may not -- and Domtel's tariff must state that its customers may not -- connect private lines provided over these facilities to the public switched network at either the U.S. or foreign end, or both for the provision of international switched [**22] basic services, unless authorized to do so by the Commission upon a finding that the destination country affords resale opportunities equivalent to those available under U.S. law in accordance with *Regulation of International Accounting Rates, Phase II, First Report and Order*, 7 FCC Rcd 559 (1991), *Order on Reconsideration and Third Further Notice of Proposed Rulemaking*, 7 FCC Rcd 7927 (1992), petition for rulemaking pending.

26. IT IS FURTHER ORDERED that Domtel shall file copies of any operating agreements entered into with its foreign correspondents with the Commission within 30 days of their execution and shall otherwise comply with the filing requirements set forth in Section 43.51 of the Commission's Rules, 47 C.F.R. § 43.51.

27. IT IS FURTHER ORDERED that Domtel shall file a tariff pursuant to Section 203 of the Communications Act, 47 U.S.C. § 203, and Part 61 of the Commission's rules, 47 C.F.R. Part 61, for the services authorized in this Order.

28. IT IS FURTHER ORDERED, that Domtel shall file the annual reports of overseas telecommunications traffic required by Section 43.61 of [**23] the Commission's rules, 47 C.F.R. § 43.61.

29. IT IS FURTHER ORDERED, that Domtel shall file annual circuit status reports in accordance with the requirements set forth in Rules for Filing of International Circuit Status Reports, CC Docket No. 93-157, Report and Order, FCC 95-280, adopted July 12, 1995.

30. This Order is effective upon release. Petitions for reconsideration under Section 1.106 of the Commission's rules, 47 C.F.R. § 1.106, may be filed within 30 days of public notice of this Order. (See Commission rule 1.4(b)(2), 47 C.F.R. 1.4 (b)(2)).

FEDERAL COMMUNICATIONS COMMISSION

William F. Caton

Acting Secretary

APPENDIX:

APPENDIX A

COUNTRIES TO BE SERVED VIA SATELLITE

Atlantic Ocean Area Regions

Latin America

Antigua	Curacao	Netherlands Antilles
Argentina	Dominican Republic	Nicaragua
Aruba	Ecuador	Panama
Bahamas	El Salvador	Paraguay
Barbados	French Guiana	Peru
Belize	Grenada	St. Lucia
Bermuda	Guantanamo Bay	St. Vincent
Bolivia	Guatemala	Surinam
Brazil	Guyana	Trinidad & Tobago
Cayman Islands	Haiti	Turks & Caicos Isles
Chile	Honduras	Uruguay
Colombia	Jamaica	Venezuela
Costa Rica	Martinique	
Europe		
Austria	Ireland	Slovenia
Belgium	Italy	Spain
Croatia	Liechtenstein	Sweden
Cyprus	Luxembourg	Switzerland
Denmark	Malta	Turkey
Finland	Monaco	United Kingdom

Atlantic Ocean Area Regions		
France	Netherlands	Vatican
Germany	Norway	Yugoslavia
Greece	Portugal	
Iceland	San Marino	
Middle/Near East and Africa and Other	Europe	
Algeria	Hungary	Qatar
Angola	Iran	Romania
Armenia	Iraq	Russian Federation
Ascension Island	Israel	Saudi Arabia
Azerbaijan	Ivory Coast	Senegal
Azores	Jordan	Sierra Leone
Bahrain	Kazakhstan	South Africa
Belarus	Kenya	Sri Lanka
Benin	Kuwait	Sudan
Botswana	Kyrgyzstan	Swaziland
Bulgaria	Latvia	Syria
Burkina Faso	Lebanon	Tajikistan
Burma	Lesotho	Tanzania
Cameroon	Liberia	Togo
Canary Islands	Libya	Tunisia
Cape Verde	Lithuania	Turkmenistan
Central African Republic	Madagascar	United Arab Emirates
Chad	Malagasy Republic	Yemen
Congo	Malawi	Zaire
Czechoslovakia	Mali	Zambia
Diego Garcia	Mauritania	Zimbabwe
Egypt	Moldova	Uganda
Estonia	Morocco	Ukraine
Ethiopia	Mozambique	Uzbekistan
Gabon	Niger	
Gambia	Nigeria	
Georgia	Oman	
Ghana	Pakistan	
Gibraltar	Poland	
Guinea		
Pacific Ocean Area Region		
American Samoa	Japan	Philippines
Australia	Kiribati	Ponape
Brunei	Korea	Saipan
China (Peoples Republic of)	Kosrae	Singapore
Christmas Island	Malaysia	Sri Lanka
Cook Island	Mariana Island	Taiwan
Ebeye	Nauru	Thailand
Fiji Islands	New Caledonia	Tonga
French Polynesia	New Guinea	Truk
Guam	New Zealand	Vanuatu
Hong Kong	Palau	Western Samoa
India	Papua New Guinea	Yap
Indonesia		

[**24]

APPENDIX B**COUNTRIES TO BE SERVED VIA CABLE**

10 FCC Rcd 12159, *; 1995 FCC LEXIS 6016, **;
1 Comm. Reg. (P & F) 647

Country	No. of 1,554 Circuits	Facility
Argentina	1	AMERICAS-1, UNISOR
Chile	1	AMERICAS-1, UNISOR
Costa Rica	1	COLUMBUS-2
Ecuador	1	TCS-1, COLUMBIA
El Salvador	1	COLUMBUS-2
French Guiana	1	TAINO-CARIB, DECMS
Guatemala	1	COLUMBUS-2
Honduras	1	COLUMBUS-2
St. Kitts & Nevis	1	TAINO-CARIB, DECMS
Nicaragua	1	COLUMBUS-2
Paraguay	1	AMERICAS-1
Peru	1	TCS-1, ASETA
Uruguay	1	AMERICAS-1, UNISOR
Mexico	1	COLUMBUS-2
St. Thomas	1	COLUMBUS-2, TAINO-CARIB
Portugal	1	COLUMBUS-2
Italy	1	COLUMBUS-2
Canary Islands	1	COLUMBUS-2
Brazil	1	AMERICAS-1
Trinidad	1	AMERICAS-1
Venezuela	1	AMERICAS-1
Canada	1	TAT-9
United Kingdom	1	TAT-9
France	1	TAT-9
Spain	1	TAT-9
Jamaica	1	TCS-1
Dominican Republic	1	TCS-1
Tortola	1	TAINO-CARIB

Legal Topics:

For related research and practice materials, see the following legal topics: