han Exercit

POTTS & TROWBRIDGE A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS SHAW PITTMAN

2300 N Street, N.W. Washington, D.C. 20037-1128 202.663.8000 Facsimile 202.663.8007

1675 Broadway New York, NY 10019-5820

ROBERT E. CONN Senior Counsel 202.663.8093 robert_conn@shawpittman.com

September 15, 1998

Washington, D.C. 2000 M Street, N.W., Room 835 Federal Communications Commission International Bureau **Telecommunications** Division Mr. George S. Li Deputy Chief, Operations

Re: ICN/CommSource Network Services File No. ITC-214-19980820-00610

Dear Mr. Li

No. TEL-00008S, dated September 11, 1998. We thank you for placing the above-referenced application on Public Notice by Report

Notice be corrected to "LLC." We respectfully request that the "INC." at the end of the applicant's name in the Public

submitted a corrected Amended Application, copy enclosed, this correction was probably received too late to have been reflected in the FCC Public Notice of September 11, 1998 Application to your staff, which erroneously contained the "INC." Although the undersigned In order to accelerate the Public Notice, the undersigned attorney submitted an Amended the applicant did not use the correct Pittsburgh P.O. Box Number, correctly contained the "LLC." The original application, which was delayed from the Mellon Bank to your office because

grant subject to the Commission's streamlined processing procedure. for File No. ITC-214-19980820-00610, without any change in the automatic effective date of a Public Notice listing applicant's correct name as "ICN/CommSource Network Services, LLC," The foregoing adequately supports, we respectfully submit, the issuance of a corrected

Robert E Sincerely affi

Attorney for ICN/CommSource

cc: Alicia Smothers Frances G. Eisenstein,

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of

ICN/COMMSOURCE NETWORK SERVICES, LLC

Application for Authorization Pursuant to Section 214 of the Communications Act of 1934 to Provide International Facilities-Based Services, And International Switched Resale Services, On A Global Basis

> Streamlined ITC-214-19980820-00610 ICN/COMMSOURCE NETWORK SERVICES, LLC

AMENDED APPLICATION

basis. international facilities-based services, and international switched resale services, on a global of 1934, as amended ("Act") and Section 63.18 of the Rules, for authority to provide dated August 1, 1998, to apply for authority pursuant to Section 214 of the Communications Act ICN/Commsource Network Services, LLC ("ICN/CNS") hereby amends it application,

FCC 2d 177 (1985) international marketplace. interest by bringing the benefits of increased customer choice and alternative services to the marketplace. Network of America v. F.C.C., 691 F.2d 525 (D.C. Cir. 1982); and Authorized User Policy, 100 \geq grant of this application will enable ICN/CNS to enter the global competitive This will further the Commission's procompetitive policies and serve the public RCA Communications, Inc. v. F.C.C., 346 U.S. 86 (1953); Telocator

63.18(h)(1)(i), with a dominant U.S. or foreign facilities-based carrier the Commission's Rules. This application is eligible for streamlined processing procedures under Section 63.12 of ICN/CNS has no affiliation, within the meaning of Section

provisions of Section 63.18 of the Commission's Rules: The following information is set forth in response to the corresponding relevant lettered

telephone number is (213) 627-9493 ("ICN/CNS"). Its address is 700 South Flower Street, Suite 420, Los Angeles, CA (a) The name of the applicant is ICN/CommSource Network Services, LLC 90017. Its

- 6 ICN is a corporation organized under the laws of the State of California.
- $\widehat{\mathbf{o}}$ Correspondence regarding this application should be addressed to:

Robert E. Conn Shaw, Pittman, Potts & Trowbridge 2300 N Street, N.W. Washington, D.C. 20037 (202) 663-8093

with a copy to:

John Jenkins ICN/CommSource Network Services, LLC 700 South Flower Street, Suite 420 Los Angeles, CA 90017

(d) ICN/CNS does not now have any authority under Section 214 of the Act.

(e) (1)ICN/CNS is requesting authority to operate as a facilities-based carrier

pursuant to the terms and conditions of Section 63.18(e)(1). The authority requested is to acquire

switched, private line, data, television and business services to all international points, except to and any necessary overseas connecting facilities as needed, to provide international basic interests in all appropriately licensed U.S. common carrier and non-common carrier facilities, those points indicated on the Commission's exclusion list.

authorized U.S. common carriers for the provision of international basic switched, private line, data, television and business services to all international points pursuant to the terms and conditions of Section 63.18(e)(2). (e) (2)ICN/CNS is also requesting authority to resell the international services of

purpose of providing international basic switched services to countries not on the FCC's published list of equivalent countries **e** (\mathfrak{Z}) ICN/CNS is not applying for authority to resell private lines for the

(h) (1)ICN/CNS has no affiliation with any foreign carrier.

(h) (2) ICN	ICN/CNS' ten percent or greater shareholders are:	er shareholders are:	
Name	Stock Ownership	Citizen	Business
R & T Family Partners, Roger Sheppard, General	25%	U.S.	Telecommunications
Partner			
John A. Jenkins	25%	U.S.	Telecommunications
Thomas A. Hakel	25%	U.S.	Telecommunications
Joseph Tae Yoon Kim	25%	South Korea	Telecommunications

(2)ICN/CNS' ten percent or greater shareholders are:

The addresses for the above shareholders are as follows: Mr. Sheppard, 14 Bracken Court, San Rafael, CA 94901; Mr. Jenkins, 700 South Flower Street, Suite 420, Los Angeles, CA 90017;

н S 1

Mr. Hakel, 328 Firethorn Drive, Rohnert Park, CA 94928; and Mr. Kim, 31-34, Sungbook

2-dong, Sungbook-Ku, Seoul, Korea.

facilities-based services ICN/CNS proposes to resell, either directly or indirectly. (h) $\overline{\mathbf{G}}$ ICN/CNS does not have an affiliation with any U.S. carrier whose

(h) (4) - ICN/CNS has no foreign affiliated carriers

substance as required by this section of the Rules of the certifications required herein, and that it will notify the Commission of any change in (h) (5) ICN/CNS acknowledges that it is responsible for the continuing accuracy

(h) (6) ICN/CNS has no foreign affiliated carriers.

(h) (7) ICN/CNS has no foreign affiliated carriers

(h) (8) ICN/CNS will be a nondominant carrier, and should be regulated as such.

any foreign carrier or administration with respect to traffic or revenue flows between the U.S and any foreign country which ICN/CNS may serve under a grant of this application (\mathbf{i}) ICN/CNS has not agreed to accept special concessions directly or indirectly from

Section 5301 of the Anti-Drug Abuse Act of 1988 S No party to this application is subject to a denial of Federal benefits pursuant to

-4-

WHEREFORE, ICN/CNS respectfully submits that the public interest, convenience and

necessity will be served by a prompt grant of this application.

Respectfully submitted,

ICN/COMMSOURCE NETWORK

m Q M

By: VY/WV/ErCOPPT Robert E. Conn Shaw Pittman Potts & Trowbridge 2300 N Street, N.W. Washington, D.C. 20037 (202) 663-8093

August 28, 1998

638822-01 / DOCSDC1