

Categories of Services for 214 Applications
(Streamline/Non-streamline)

- ASSIGNMENT OF LICENSE
- GLOBAL FACILITIES-BASED SERVICE
- GLOBAL FACILITIES-BASED/GLOBAL RESALE SERVICE
- GLOBAL RESALE SERVICE
- INDIVIDUAL FACILITIES-BASED SERVICE
- INTERCONNECTED PRIVATE LINE RESALE SERVICE
- LIMITED GLOBAL FACILITIES-BASED SERVICE/LIMITED GLOBAL RESALE SERVICE
- LIMITED GLOBAL FACILITIES-BASED SERVICE
- LIMITED GLOBAL RESALE SERVICE
- INMARSAT AND MOBILE SATELLITE SERVICE
- SWITCHED RESALE SERVICE
- TRANSFER OF CONTROL
- SUBMARINE CABLE LANDING LICENSE
- INTERNATIONAL SPECIAL PROJECT

Description of Application:

*Permit to eL - Norway to be
accepted as permit on US-Norway route*

Copy to #131

LAW OFFICES OF
PAUL, HASTINGS, JANOPSKY & WALKER LLP

A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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MINATO-KU, TOKYO 107, JAPAN
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September 3, 1998

WRITER'S DIRECT ACCESS

OUR FILE NO.

(202)508-9530

mwcohen@phjw.com

ITC-214-19980826-00607

VIA MESSENGER AND FACSIMILE

Ms. Fran Eisenstein
Federal Communications Commission
International Bureau
2000 M Street
8th Floor
Washington, D.C. 20054

Re: **Request of Clarion GlobalCom, LLC for Authority Pursuant to Section 214
of the Communications Act of 1934, as amended, for Global Authority to Act
as a Facilities-Based and Resale Carrier: Supplemental Clarifying
Information**

Dear Ms Eisenstein:

Pursuant to your request, Clarion GlobalCom, LLC ("Clarion Global"), by its undersigned counsel, submits this letter to clarify certain information pertaining to Clarion Global's above-referenced application for authority pursuant to Section 214 of the Communications Act, as amended.

Specifically, the name, address, citizenship and principal business of the shareholders that control ten (10) percent or more of Clarion Global, the applicant, are as follows:

PAUL, HASTINGS, JANOFSKY & WALKER LLP

Ms. Fran Eisenstein
Federal Communications Commission
September 3, 1998
Page 2

Shareholder: Ms. Nancy Ruffing

Address: Clarion GlobalCom, LLC
6660 W. 85th Place
Los Angeles, CA 90045
Telephone: (310) 641-4565
U.S.A.

Citizenship: President/CEO of Telecommunications Corporation
Principal Business:

Shareholder: Clarion Resources Communications Corporation

Address: 424 Mt. Vernon Highway
Atlanta, GA 30328
Telephone: (404) 252-9070

Citizenship: Delaware Corporation
Principal Business: Telecommunications

The ten (10) percent or more stockholders of Clarion Resources Communications Corporation are as follows:

Shareholder: Mr. Alec McLarty

Address: 424 Mt. Vernon Highway
Atlanta, GA 30328
Telephone: (404) 252-9070
U.S.A.

Citizenship: Telecommunications
Principal Business:

Shareholder: Telenor Global Services AS

Address: P.O. Box 6701
St. Olavs plass
N-0130 Oslo, Norway
Telephone: (011) 47 22 77 73 11

Citizenship: Norwegian corporation
Principal business: Telecommunications

PAUL, HASTINGS, JANOFSKY & WALKER LLP

Ms. Fran Eisenstein
Federal Communications Commission
September 3, 1998
Page 3

This letter also confirms that the applicant qualifies for streamlined treatment of this application pursuant to Section 63.12(c)(1)(iii), in that the affiliated destination market, Norway, is a WTO Member country and the applicant agrees to be classified as a dominant carrier to the affiliated destination country under Section 63.10 of the Commission's Rules, without prejudice to its right to petition for reclassification at a later date. In addition, regarding the applicant's other foreign carrier affiliations (with Andrella Ltd. in the United Kingdom and with Telenordia AB in Sweden), these foreign carriers are non-dominant and are based in WTO Member countries. The application, therefore, should qualify for streamlined treatment under the Commission's Rules.

Please feel free to contact me should you have any questions concerning the foregoing.

Respectfully submitted,



Michelle W. Cohen
for PAUL, HASTINGS, JANOFSKY & WALKER LLP
Counsel for Clarion GlobalCom, LLC

cc: Troy Tanner, Esq. (via facsimile)

LAW OFFICES OF
PAUL, HASTINGS, JANOFFSKY & WALKER LLP

A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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AUG 26 1998

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ITR-214-19980826-00607

OUR FILE NO.

BY SAME DAY DELIVERY COURIER

Federal Communications Commission
International Bureau Telecommunications Division
Post Office Box 358115
Pittsburgh, Pennsylvania 15251-5115

Re: Application of Clarion GlobalCom, LLC for Global Authority Pursuant
to Section 214 of the Communications Act of 1934, as amended, to
Operate as an International Facilities-Based and International Resale
Carrier

Dear Sirs or Mesdames:

We represent Clarion GlobalCom, LLC ("Clarion Global"), which requests authority pursuant to Section 214 of the Communications Act, 47 U.S.C. § 214, and Section 63.18 of the Commission's Rules, 47 U.S.C. § 63.18, for global facilities-based and global resale authority between the United States and various international points.

On behalf of Clarion Global, we respectfully submit herewith for filing with the Commission one original and six (6) copies of an Application pursuant to Section 214 and the Commission's Rules. In addition, Clarion Global requests streamlined treatment of this Application pursuant to 47 C.F.R. § 63.12. A completed FCC Form 159 ("Remittance Advice") is also enclosed.

On behalf of Clarion Global, there is also enclosed with this letter a check made payable to the order of the Commission in the amount of Seven Hundred Forty-Five Dollars and No Cents (\$745.00). The check constitutes payment in full of the processing fee for the Application herewith submitted for filing.

PAUL, HASTINGS, JANOFSKY & WALKER LLP

Federal Communications Commission
August 26, 1998
Page 2

Please date stamp the extra copy of this application as having been received by the Commission's application processing fee payment facility at the Mellon Bank in Pittsburgh, Pennsylvania as of the date of such receipt, and return the date-stamped "File Copy" of this letter to our messenger.

In the event that the Commission or its staff should have any questions concerning the Application herewith submitted for filing, kindly refer them to Clarion Global's undersigned counsel.

Very truly yours,



Michelle W. Cohen
for PAUL, HASTINGS, JANOFSKY & WALKER LLP

Enclosures

REMITTANCE ADVICE

(1) LOCKBOX # 358115

PAGE NO. 1 of 1

SPECIAL USE

FCC USE ONLY

SECTION A - PAYER INFORMATION

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card)
Paul, Hastings, Janofsky & Walker LLP

(3) TOTAL AMOUNT PAID (dollars and cents)
\$ 745.00

(4) STREET ADDRESS LINE NO. 1

1299 Pennsylvania Avenue N.W., Tenth Floor

(5) STREET ADDRESS LINE NO. 2

ATTN: Michelle W. Cohen

(6) CITY

Washington

(7) STATE

DC

(8) ZIP CODE

20004-2400

(9) DAYTIME TELEPHONE NUMBER (include area code)

(202) 508-9500

(10) COUNTRY CODE (if not in U.S.A.)

IF PAYER NAME AND THE APPLICANT NAME ARE DIFFERENT, COMPLETE SECTION B
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C)

SECTION B - APPLICANT INFORMATION

(11) APPLICANT NAME (if paying by credit card, enter name exactly as it appears on your card)

Clarion GlobalCom, LLC

(12) STREET ADDRESS LINE NO. 1

6660 W. 85th Place

(13) STREET ADDRESS LINE NO. 2

(14) CITY

Los Angeles

(15) STATE

CA

(16) ZIP CODE

90045

(17) DAYTIME TELEPHONE NUMBER (include area code)

(310) 641-4565

(18) COUNTRY CODE (if not in U.S.A.)

COMPLETE SECTION C FOR EACH SERVICE. IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEETS (FORM 159-C)

SECTION C - PAYMENT INFORMATION

(19A) FCC CALL SIGN/MOTHER ID

(20A) PAYMENT TYPE CODE (PTC)

C U T

(21A) QUANTITY

01

(22A) FEE DUE FOR (PTC) IN BLOCK 20A

\$ 745.00

FCC USE ONLY

(23A) FCC CODE 1

(20B) PAYMENT TYPE CODE (PTC)

(21B) QUANTITY

(22B) FEE DUE FOR (PTC) IN BLOCK 20B

FCC USE ONLY

(19B) FCC CALL SIGN/MOTHER ID

(20C) PAYMENT TYPE CODE (PTC)

(21C) QUANTITY

(22C) FEE DUE FOR (PTC) IN BLOCK 20C

FCC USE ONLY

(23B) FCC CODE 1

(20D) PAYMENT TYPE CODE (PTC)

(21D) QUANTITY

(22D) FEE DUE FOR (PTC) IN BLOCK 20D

FCC USE ONLY

(19C) FCC CALL SIGN/MOTHER ID

(20E) PAYMENT TYPE CODE (PTC)

(21E) QUANTITY

(22E) FEE DUE FOR (PTC) IN BLOCK 20E

FCC USE ONLY

(23C) FCC CODE 1

(20F) PAYMENT TYPE CODE (PTC)

(21F) QUANTITY

(22F) FEE DUE FOR (PTC) IN BLOCK 20F

FCC USE ONLY

(19D) FCC CALL SIGN/MOTHER ID

(20G) PAYMENT TYPE CODE (PTC)

(21G) QUANTITY

(22G) FEE DUE FOR (PTC) IN BLOCK 20G

FCC USE ONLY

(23D) FCC CODE 1

(20H) PAYMENT TYPE CODE (PTC)

(21H) QUANTITY

(22H) FEE DUE FOR (PTC) IN BLOCK 20H

FCC USE ONLY

(24D) FCC CODE 2

SECTION D - TAXPAYER INFORMATION (REQUIRED)

(25) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-1 IS DIFFERENT FROM PAYER NAME IN A-2

PAYER TIN

0 9 5 2 2 0 9 6 7 5

APPLICANT TIN

5 8 2 3 9 6 9 7 3

SECTION E - CERTIFICATION

(27) CERTIFICATION STATEMENT

I, Nancy Ruffing certify under penalty of perjury that the foregoing and supporting information are true and correct to the best of my knowledge, information and belief. SIGNATURE Nancy Ruffing

(PRINT NAME)

SECTION F - CREDIT CARD PAYMENT INFORMATION

MASTERCARD/VISA ACCOUNT NUMBER

Grid for account number: 16 empty boxes

EXPIRATION DATE

Grid for expiration date: MONTH [] YEAR []

MASTERCARD

VISA

AUTHORIZED SIGNATURE

DATE

I hereby authorize the FCC to charge my VISA or MASTERCARD for the service(s)/hour(s)/month(s) herein described.

SEE PUBLIC BURDEN ESTIMATE ON REVERSE

PAUL, HASTINGS,

2185

JANOFSKY

Ⓢ

WALKER LLP

1299 Pennsylvania Avenue, N.W. • Washington, DC 20004 • 202-508-9500

Operating Account

DATE August 26, 1998

15-52/540

PAY TO THE ORDER OF Federal Communications Commission

\$ 745.00

Seven hundred forty five and 00/100

DOLLARS

CRESTAR

Crestar Bank
Washington, DC

By Mills

MP

⑆00002185⑆ ⑆054000522⑆ 206641958⑆

PAUL, HASTINGS, JANOFSKY & WALKER
WASHINGTON OFFICE

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DELUXE - FORM DVCP-3 V-2

DATE	DESCRIPTION	AMOUNT
08/26/98	Federal Communications Commission Section 214 Application Filing Fee 333333.333333/Michelle Cohen	Check#2185 \$745.00

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

In the Matter of
Clarion GlobalCom, LLC.

Application for authority pursuant)
to Section 214 of the Communications)
Act of 1934, as amended, for global) File No. ITC-98 _____
Authority to operate as an international)
facilities based and resale carrier. }

APPLICATION UNDER
SECTION 214 OF THE COMMUNICATIONS ACT

Application

Clarion GlobalCom, LLC hereby requests authority, pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. Section 214, and Section 63.18 of the Commission's Rules, 47 C.F.R. Section 63.18, to provide global international facilities-based and resale services between the United States and international points.

Clarion GlobalCom, LLC is a new U.S. company organized to provide international telecommunications services. Clarion GlobalCom, LLC expects to serve both business and residential customers throughout the United States. Although Clarion GlobalCom, LLC is affiliated with a foreign carrier, the affiliated destination market, Norway, is a World Trade Organization member country and the applicant qualifies for a presumption of non-dominance under Section 63.10 (a)(4), because the applicant expects to provide service to Norway through the resale of unaffiliated U.S. facilities based carriers international switched services.

By granting this application, the Commission will serve the public interest, convenience and necessity by promoting competition in the international services market. Competition will benefit U.S. consumers by increasing service options and lowering prices. Thus, the public interest will be served by the grant of 214 authority to Clarion GlobalCom, LLC.

Section 63.18 Information

The following information is submitted, as required by Section 63.18 of the Commission's Rules, in support of Clarion GlobalCom, LLC's request for authorization:

(a) The name, address, and telephone number of applicant:

Clarion GlobalCom, LLC
6660 W. 85th Place
Los Angeles, CA 90045
Telephone: (310) 641-4565

(b) Clarion GlobalCom, LLC is a Limited Liability Company under the laws of the State of Georgia.

(c) Correspondence concerning this application should be sent to:

Ms. Nancy Ruffing
President/CEO
Clarion GlobalCom, LLC
6660 W. 85th Place
Los Angeles, CA 90045
Telephone: (310) 641-4565

(d) Clarion GlobalCom, LLC has not received authority previously under Section 214 of the Communications Act.

(e) Clarion GlobalCom, LLC requests global facilities-based and resale Section 214 authority pursuant to the terms and conditions of Section 63.18(e)(1) and (e)(2) of the Commission's Rules.

(f) At this time, Clarion GlobalCom, LLC seeks no other authorization available under Section 63.18(e).

(g) Not Applicable

(h)(1) Clarion GlobalCom, LLC certifies that it is affiliated with the following foreign carrier: Telenor Global Services AS ("Telenor Global"), because the applicant's majority owner is majority owned by the same parent as Telenor Global. Telenor Global is a foreign carrier in the following country: Norway. Norway is a member of the World Trade Organization and has opened its telecommunications markets to competition. Telenor Global is also affiliated with a "start up" carrier, Andrella based in the United Kingdom; as a "start up" it will have only a limited market share. The United Kingdom is a member of the World Trade Organization. In addition, Telenor Global may be deemed to be affiliated with Telenordia AB, which is jointly owned by Telenor, Tele Denmark and British Telecom. Telenordia AB is a Swedish operator and supplier of international and domestic voice and data services. It was established in 1995 and does not have a dominant position in the Swedish market. Sweden is a member of the World Trade Organization.

(h)(2) In support of this certifications, the name, address, citizenship and principal business of the sole shareholder that controls ten percent or more of Clarion GlobalCom, LLC is as follows:

Ms. Nancy Ruffing
Clarion GlobalCom, LLC
6660 W. 85th Place
Los Angeles, CA 90045
Telephone: (310) 641-4565

Mr. Alec McLarty
Clarion Resources Communications Corporation
424 Mt. Vernon Highway
Atlanta, GA 30328
Telephone: (404) 252-9070

Principal Business: President/CEO of Telecommunications Corporation.

Citizenship: USA

(h)(3) By this certification, the applicant certifies that it is affiliated, as defined in 47 C.F.R. § 63.18(h)(1) (i), with a United States carrier whose services it might resell. Although it is uncertain whether the applicant will resell any of the carrier's services, the applicant sets forth this information for the information of the Commission. Specifically, the applicant's affiliated foreign carrier, Telenor Global Services AS is the majority shareholder in Clarion Resources Communications Corporation, a Delaware corporation ("Clarion"). Pursuant to an Agreement and Plan of Merger dated January 26, 1998, subject to regulatory approvals and other conditions, Teledata International, Inc. a Georgia corporation ("TDI"), will become a wholly owned subsidiary of Clarion. TDI currently holds section 214 authorizations which were granted by the Commission in File Nos. ITC 93-121, ITC 95-096, and ITC 93-274.

(h)(4) Clarion GlobalCom, LLC will comply with Section 64.18 (h) (4) obligation for the continuing accuracy of paragraphs (h) (1) - (3) of section 64.18.

(h)(5) The applicant is affiliated with the following foreign carrier: Telenor Global Services AS, a foreign carrier in the following country: Norway. Norway is a member of the World Trade Organization and has opened its telecommunications markets to competition. Telenor Global is also affiliated with a "start up" carrier, Andrella Ltd., based in the United Kingdom; as a "start up" it will have only a limited market share. The United Kingdom is a member of the World Trade Organization. In addition, Telenor Global may be deemed to be affiliated with Telenordia AB, which is jointly owned by Telenor, Tele Denmark and British Telecom. Telenordia AB is a Swedish operator and supplier of international and domestic voice and data services. It was established in 1995 and does not have a dominant position in the Swedish market. Sweden is a member of the World Trade Organization.

(h)(6) The applicant is affiliated with the following foreign carriers: see (h) (5) above.

(h)(7) Not applicable.

(h)(8) The applicant seeks to be classified as non-dominant on all routes. For the US - Norway route, the applicant qualifies for non-dominant treatment pursuant to 47 C.R.F. Section 63.10(a)(4), as explained on page 1.

(i) Pursuant to Section 64.18 (i), the applicant certifies that it has not agreed to accept special concessions (as defined in Section 63.14(b) of the Commission's Rules) directly or indirectly, from any foreign carrier with respect to any U.S. international route where the foreign carrier possess sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and

will not enter into such agreements in the future.

(j) Clarion GlobalCom, LLC certifies that no party to this application has been denied federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

The applicant qualifies for streamlined treatment of this application pursuant to 47 C.R.F. Section 63.12 (c)(ii), because the affiliated destination market is a World Trade Organization member country and the applicant qualifies for a presumption of non-dominance under Section 63.10(a)(4).

Conclusion

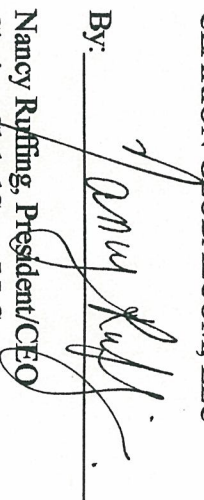
In conclusion, Clarion GlobalCom, LLC certifies that all of the information in this application is accurate and correct.

For these reasons, Clarion GlobalCom, LLC respectfully requests that the Commission grant this application.

Respectfully submitted this 25th day of August, 1998.

CLARION GLOBALCOM, LLC

By: _____



Nancy Ruffing, President/CEO
Clarion GlobalCom, LLC
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Los Angeles, CA 90045
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