

Categories of Services for 214 Applications
(~~Streamlined/Non-streamlined~~)

ITC-214-19980901-00665

- 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: _____

FGC/MELLON

SEP 01 1998

DUPLICATE COPY

PIPER & MARBURY

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1 200 NINETEENTH STREET, N.W.

WASHINGTON, D. C. 20036-2430

202-961-3900

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RANDALL B. LOWE
202-961-6477

BALTIMORE
NEW YORK
PHILADELPHIA
EASTON

August 31, 1998

BY FEDERAL EXPRESS

Federal Communications Commission
International Bureau - Telecommunications
P. O. Box 358115
Pittsburgh, Pennsylvania 15251-5115

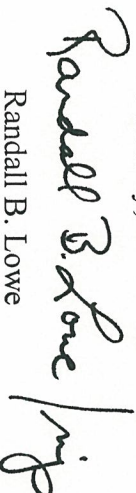
Gentlemen:

On behalf of Transwire New York Operations, LLC, and pursuant to Section 214 of the Communications Act of 1934, as amended, and Section 63.18 of the Commission's rules, we are submitting herewith an original and five (5) copies of an application for authority to provide facilities-based and resale telecommunications services between the United States and all permissible international points. This application is subject to the Commission's streamlined processing procedures.

Also being submitted is FCC Form 159 and a check in the amount of \$745.00, in payment of the required filing fee.

Any questions regarding this matter should be directed to the undersigned counsel.

Sincerely,


Randall B. Lowe

RBL/mjs
Attachments

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

In the Matter of

TRANSWIRE NEW YORK OPERATIONS, LLC

) ITC-214-19980901-00665

) File No. _____

) Application for Authority Pursuant
) to Section 214 of the Communications
) Act of 1934, as Amended, to Provide
) Facilities-Based and Resale
) Telecommunications Services
) Between the United States and All Permissible
) International Points
)

APPLICATION OF TRANSWIRE NEW YORK OPERATIONS, LLC
FOR SECTION 214 AUTHORITY

Transwire New York Operations, LLC ("Applicant"), pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214 ("Act"), and Section 63.18 of the Commission's Rules, 47 C.F.R. § 63.18, hereby applies for authority to provide facilities-based and resale telecommunications service between the United States and all permissible international points. Applicant is not affiliated with any foreign carrier and, pursuant to Section 63.12 of the Commission's rules, this application is subject to streamlined processing. In support hereof, and in accordance with the specific provisions of Section 63.18, Applicant respectfully submits the following information:

(a) Applicant: Transwire New York Operations, LLC
8 West 19th Street
New York, New York 10011
Telephone: (212) 647-7754

(b) The limited liability company is organized under the laws of the State of Delaware.

(c) All correspondence should be sent to:

Mr. Terrence Peck
Transwire New York Operations, LLC
8 West 19th Street
New York, New York 10011

with a copy to:

Randall B. Lowe, Esq.
Piper & Marbury L.L.P.
1200 19th Street, N.W.
Washington, D.C. 20036
(202) 861-6477

- (d) Applicant has received no previous authority under Section 214 of the Act.
- (e) Applicant is requesting global facilities-based Section 214 authority pursuant to the terms and conditions of Section 63.18(e)(1) of the Commission's rules, and is likewise requesting global international resale Section 214 authority pursuant to the terms and conditions of Section 63.18(e)(2) of the Commission's rules.
- (f) Applicant is requesting authority only under Section 63.18(e)(1) and Section 63.18(e)(2) of the Commission's Rules.
- (g) N/A (only applicable if applying for facilities-based authority under Section 63.18(e)(6).
- (h)(1) Applicant certifies that it is not itself a foreign carrier and is not affiliated with a foreign carrier.
- (h)(2) Applicant is a wholly-owned subsidiary of Transwire Communications, Inc., a Delaware corporation with the same business address and telephone number as the Applicant. The principal business of Transwire Communications, Inc. is the offering of telecommunications services through its subsidiary operating companies.
- (h)(3) Applicant is not affiliated with any U.S. carrier whose facilities based services it proposes to resell, and is not affiliated with any foreign carrier.
- (h)(8) Applicant is not affiliated with a foreign carrier and seeks to be regulated as non-dominant for the provision of international communications service to all permissible international points.

(i) Applicant certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier or administration with respect to traffic or revenue flows between the U.S. and any foreign country which the applicant may serve under the authority granted under this part and will not enter into such agreements in the future.

(j) Applicant certifies that no party to this Application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 47 U.S.C. § 853a.

Wherefore, Applicant respectfully submits that it is qualified under the Commission's Rules to offer the facilities-based and resale telecommunications services described herein and that the present and future public convenience and necessity will be served by the grant of this Application. Applicant certifies that the statements contained in the foregoing document are true, correct and complete to the best of its knowledge, information and belief. Accordingly, Applicant requests that the Commission grant this Application.

Respectfully submitted,

TRANSWIRE NEW YORK OPERATIONS, LLC

By:



Name: TERRENCE M. PECK

Title: MANAGER

Date: 8/28/98

PIPER & MARBURY

L.L.P.

RANDALL B. LOWE
202-861-6477

1 200 NINETEENTH STREET, N.W.
WASHINGTON, D. C. 20036-2430
202-861-3800
FAX: 202-223-2085

BALTIMORE
NEW YORK
PHILADELPHIA
EASTON

September 9, 1998

BY FACSIMILE

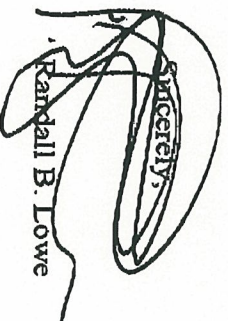
Ms. Frances Eisenstein
Federal Communications Commission
2000 M Street, N.W.
Washington, D.C. 20554

Dear Ms. Eisenstein:

With respect to the requests for 214 authorization dated August 31, 1998 filed on behalf of Transwire Operations, LLC, Transwire New York Operations, LLC, and Transwire Virginia Operations, LLC, this is to advise that the 10% or greater shareholders of Transwire Communications, Inc., the parent of each of these applicants for 214 authority, is as follows:

<u>Entity Name</u>	<u>Percentage</u>	<u>Citizenship</u>
Vision Capital Partners LLC	26.81%	U.S.
Catamount Capital LLC	17.65%	U.S.
Visual Radio, Inc.	17.65%	U.S.
Comdisco, Inc.	29.41%	U.S.

If you have any further questions, please do not hesitate to call me or Marni Shapiro at (202) 861-3987.

Sincerely,

 Randall B. Lowe

RBL/mjs

PIPER & MARBURY

LLP

1 200 NINETEENTH STREET, N.W.,
WASHINGTON, D.C. 20036-2430202-601-3900
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rlowe@pipermar.com

September 30, 1998

BY FACSIMILEMs. Frances Bisenstein
Federal Communications Commission
2000 M Street, N.W.
Washington, D.C. 20554

Dear Ms. Eisenstein:

With respect to the requests for 214 authorization dated August 31, 1998 filed on behalf of Transwire Operations, LLC, Transwire New York Operations, LLC, and Transwire Virginia Operations, LLC, this is to advise that the 10% or greater shareholders of Transwire Communications, Inc., the parent of each of these applicants for 214 authority, are as follows:

<u>Entity Name</u>	<u>Percentage</u>	<u>Citizenship</u>
Vision Capital Partners, LLC	22.79%	U.S.
Catamount Capital LLC	15%	U.S.
Visual Radio, Inc.	15%	U.S.
Comdisco, Inc.	24%	U.S.

Vision Capital Partners, LLC is owned by individuals, all of whom are United States citizens, and all of whom hold 33.33%: Robert Steel, Russ Pallelsen and Lowell Kraft

Catamount Capital LLC is owned by two individuals, both United States citizens: Steve Friedman holds 66.67% and Chuck Davis holds 33.33%.

Visual Radio, Inc. is 10% owned by Vision Capital Partners, LLC; 34.3% by Catamount Capital LLC; and 28.9% by Lexicom, Inc. Lexicom, Inc. is, in turn, 100% owned by Terrence M. Peck, a U.S. citizen.

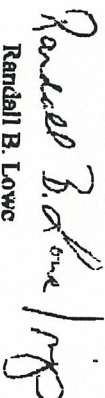
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LLP

Ms. Frances Eisenstein
September 30, 1998
Page 2

Comdisco, Inc. is a publicly traded company. Nicholas K. Pontikas, a U.S. citizen, holds 25% of Comdisco's stock.

If you have any further questions, please do not hesitate to call me or Marni Shapiro at (202) 861-3987.

Sincerely,



Randall B. Lowe

RBL/mjs