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The letter*

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

ITC-214-19980901-00674

- 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: _____

FCC/MELLOW

SEP 01 1998

DUPLICATE COPY
PIPER & MARBURY

L.L.P.

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WASHINGTON, D. C. 20036-2430

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EASTON

RANDALL B. LOWE
202-861-6477

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 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 consent to the assignment of the global resale 214 authority held by TransWire Communications, L.L.C. (FCC File No. ITC-98-299) to its wholly-owned subsidiary, Transwire Operations, LLC. In addition, Transwire Operations, LLC seeks authority to provide facilities-based 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

(a) Applicant/Assignee: Transwire Operations, L.L.C.
8 West 19th Street
New York, New York 10011
Telephone: (212) 647-7754

Assignor:
Transwire Communications, Inc.
8 West 19th Street
New York, New York 10011
Telephone: (212) 647-7754

The global resale 214 authority granted in April, 1998 (FCC File No. ITC 98-299) was issued in the name of Transwire Communications, L.L.C. That entity recently merged with Transwire Acquisition Corp. and changed its name to Transwire Communications, Inc., a Delaware corporation (hereinafter the "Assignor").

(b) Applicant/Assignee is a limited liability company organized under the laws of the State of Delaware. Assignor is a Delaware corporation.

(c) All correspondence, on behalf of both the Applicant/Assignee and the Assignor should be sent to:

Mr. Terrence Peck
Transwire Operations, L.L.C.
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/Assignee has received no previous authority under Section 214 of the Act. Assignor currently holds global resale 214 authority granted in 1998, FCC File No. ITC-98-299, which is the subject of this request for assignment.

- (e) Upon grant of the requested assignment pursuant to Section 76.18(e)(5) of the Commission's rules, Applicant will have global international resale Section 214 authority. In addition, Applicant is also hereby requesting global facilities-based Section 214 authority pursuant to the terms and conditions of Section 63.18(e)(1) of the Commission's rules.
- (f) Applicant/Assignee is requesting global facilities-based authority under Section 63.18(e)(1) and assignment of the 214 authority held by its parent company under Section 63.18(e)(5) 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/Assignee certifies that it is not itself a foreign carrier and is not affiliated with a foreign carrier.
- (h)(2) Applicant/Assignee is a wholly-owned subsidiary of Transwire Communications, Inc., a Delaware corporation. The principal business of Transwire Communications, Inc. is the offering of telecommunications services through its subsidiary operating companies. Both Applicant and its parent company have the same business address and telephone number.
- (h)(3) Applicant/Assignee 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/Assignee 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/Assignee 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/Assignee 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/Assignee respectfully submits that it is qualified under the Commission's Rules to offer the global 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/Assignee 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/Assignee requests that the Commission grant this Application.

Respectfully submitted,

TRANSWIRE OPERATIONS, LLC

By:



Name: TERRENCE M. PECUR

Title: MANAGER

Date: 9/28/98

PIPER & MARBURY

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RANDALL B. LOWE
202-861-6477

September 9, 1998

BY FACSIMILE

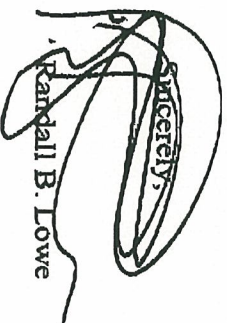
Ms. Frances Eisenstein
Federal Communications Commission
2000 M Street, N.W.
Washington, D.C. 20554

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:

Entity Name	Percentage	Citizenship
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.
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RANDALL B. LOWE
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 rlowe@pipermar.com

September 30, 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, 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 Pallecca and Lowell Kraff.

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.

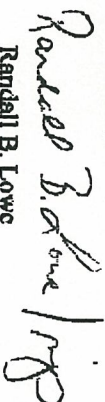
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LLP

Ms. Frances Eisenstein
September 30, 1998
Page 2

Comdisco, Inc. is a publicly traded company. Nicholas K. Pontikes, 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