

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

- 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: \_\_\_\_\_

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

In re Application of )  
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 NEXTLINK Florida, Inc. )  
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 NEXTLINK Wisconsin, Inc. )  
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 NEXTLINK District of Columbia, Inc. )  
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 NEXTLINK Virginia, L.L.C. )  
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 NEXTLINK Maryland, L.L.C. )  
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 NEXTLINK Indiana, Inc. )  
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 NEXTLINK Mississippi, Inc. )  
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 NEXTLINK Connecticut, Inc. )  
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 NEXTLINK Arizona, Inc. )  
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 NEXTLINK Massachusetts, Inc. )  
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 NEXTLINK Delaware, Inc. )  
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 NEXTLINK Missouri, Inc. )  
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 for Authorization Pursuant )  
 to Section 214 of the Communications Act )  
 of 1934, As Amended, to Operate as )  
 International Resale Carrier )

File No. *ITC-214-19980908-DD638*

APPLICATION

NEXTLINK Florida, Inc., NEXTLINK Wisconsin, Inc., NEXTLINK District of Columbia, Inc., NEXTLINK Virginia, L.L.C., NEXTLINK Maryland, L.L.C., NEXTLINK Indiana, Inc., NEXTLINK Connecticut, Inc., NEXTLINK Mississippi, Inc., NEXTLINK Arizona, Inc., NEXTLINK Massachusetts, Inc., NEXTLINK Delaware, Inc. and NEXTLINK Missouri, Inc. (collectively, "Applicants") hereby apply for authority pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, and Section 63.18 of the Federal Communications Commission's ("Commission") Rules, 47 C.F.R. § 63.18, to provide international communications services in the United States by reselling services of Commission-authorized carriers to all international points served by those carriers. Specifically, Applicants seek Section 214 authority to resell all

forms of international communications services permitted under and pursuant to the terms and conditions of 47 C.F.R. § 63.18 (e)(2). Additionally, Applicants seek Section 214 authority to resell private line services to all countries that are subsequently determined by the International Bureau of the Commission to provide equivalent resale opportunities. Applicants request streamlined processing under the Commission's international Section 214 rules.<sup>1</sup>

Grant of this Application will promote competition in international telecommunications services that will provide additional consumer choices and likely decrease consumer prices. Authorizing Applicants to resell international services is consistent with the Commission's goals of promoting competition in international telecommunications.<sup>2</sup> The Commission's Policy Statement on international accounting rate reform which confirms that international resale is in the public interest supports approval of this Application.<sup>3</sup> The Commission's approval of this Application will thus serve public convenience, necessity and interest.

#### SECTION 63.18 STATEMENT

In support of this request for authorization, the Applicants provide the following information as required by 47 C.F.R. § 63.18. The identifying letters and numerals here correspond to the subsections of 47 C.F.R. § 63.18.

- a) The Applicants seeking Section 214 authorization are:

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<sup>1</sup> *Streamlining the International section 214 Authorization Process and Tariff Requirements*, Report and Order, FCC 96-79, IB Docket No. 95-118 (released March 13, 1996), codified at 47 C.F.R. § 63.12.

<sup>2</sup> *Regulation of International Accounting Rates*, Report and Order, 7 FCC Rcd. 559 (1991). The Commission recognized that resale of international telecommunications services would provide public benefits by increasing competition, reducing prices for telecommunications services and eliminating the possibility of price discrimination. *Id.* at para. 8.

NEXTLINK Florida, Inc.  
476 Highway A1A  
Satellite Beach, FL 32937

NEXTLINK Wisconsin, Inc.  
500-108th Avenue NE, Suite 2200  
Bellevue, WA 98004

NEXTLINK District of Columbia, Inc.  
1730 Rhode Island Ave. NW, Suite 1000  
Washington, DC 20036

NEXTLINK Virginia, L.L.C.  
500-108th Avenue NE, Suite 2200  
Bellevue, WA 98004

NEXTLINK Maryland, L.L.C.  
500-108th Avenue NE, Suite 2200  
Bellevue, WA 98004

NEXTLINK Indiana, Inc.  
500-108th Avenue NE, Suite 2200  
Bellevue, WA 98004

NEXTLINK Connecticut, Inc.  
500-108<sup>th</sup> Avenue NE, Suite 2200  
Bellevue, WA 98004

NEXTLINK Mississippi, Inc.  
500-108th Avenue NE, Suite 2200  
Bellevue, WA 98004

NEXTLINK Arizona, Inc.  
500-108<sup>th</sup> Avenue NE, Suite 2200  
Bellevue, WA 98004

NEXTLINK Massachusetts, Inc.  
500-108<sup>th</sup> Avenue NE, Suite 2200  
Bellevue, WA 98004

NEXTLINK Missouri, Inc.  
500-108<sup>th</sup> Avenue NE, Suite 2200  
Bellevue, WA 98004

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<sup>3</sup> Policy Statement on International Accounting Rate Reform, FCC 96-37 (released January 31, 1996).



NEXTLINK Delaware, Inc.  
500-108<sup>th</sup> Avenue NE, Suite 2200  
Bellevue, WA 98004

b) NEXTLINK Florida, Inc., NEXTLINK Wisconsin, Inc., NEXTLINK District of Columbia, Inc., NEXTLINK Mississippi, Inc., NEXTLINK Indiana, Inc., NEXTLINK Arizona, Inc., NEXTLINK Massachusetts, Inc. NEXTLINK Missouri, Inc., NEXTLINK Delaware, Inc. and NEXTLINK Connecticut, Inc. are corporations organized in the United States of America under the laws of the State of Washington. NEXTLINK Virginia, L.L.C. and NEXTLINK Maryland, L.L.C. are single-member, limited liability companies organized in the United States of America under the laws of the State of Washington.

c) Correspondence regarding this Application should be directed to:  
Daniel Gonzalez, Director - Regulatory Affairs  
NEXTLINK Communications, Inc.  
1730 Rhode Island Avenue NW, Suite 1000  
Washington, D.C. 20036  
(202) 721-0999

Jason Williams, Manager – Regulatory Affairs  
NEXTLINK Communications, Inc.  
500 - 108th Avenue NE, 2200  
Bellevue, WA 98004  
(425) 519-8900

d) The Applicants do not currently have nor have they ever received international Section 214 authority from the Commission.

- e) Applicants are applying for authority to resell the international services of authorized U.S. common carriers pursuant to the terms and conditions of 47 C.F.R. § 63.18 (e)(2).
- f) Not Applicable.
- g) Not Applicable. This requirement is not applicable because Applicants are not seeking facilities-based authority under 47 C.F.R. § 63.18(e)(6).

- h) 1) Applicants are not affiliated with a foreign carrier, as that term is defined in 47 C.F.R § 63.18 (h)(1)(B)(ii).

2) Applicants are wholly owned by NEXTLINK Communications, Inc. Eagle River Investments, L.L.C. owns approximately 36% of NEXTLINK Communications, Inc. Eagle River Investments, L.L.C. is majority owned and controlled by Craig O. McCaw, Wendy P. McCaw owns approximately 18% of NEXTLINK Communications, Inc. No other party owns 10% or greater interest in NEXTLINK Communications, Inc., or in Eagle River Investments, L.L.C. The name, address, citizenship and principal business of each of the ten percent or greater direct and indirect shareholders or other equity holders in the Applicants

are:

NEXTLINK Communications, Inc.  
500 108<sup>th</sup> Ave. NE, Suite 2200  
Bellevue, WA 98104  
Citizenship: USA  
Principal Business: Telecommunications

Eagle River Investments, L.L.C.  
2320 Carrillon Point  
Kirkland, WA 98033  
Citizenship: USA  
Principal Business: Investment

Craig O. McCaw  
2320 Carrillon Point  
Kirkland, WA 98033  
Citizenship: USA  
Principal Business: Individual

Wendy P. McCaw  
c/o Gregory Canova Parker  
Seed Mackall & Cole, LLP  
1332 Anacapa, Suite 200  
Santa Barbara, CA 93101  
Citizenship: USA  
Principal Business: Individual

- 3) Applicants are not affiliated with the carriers whose facilities-based services they propose to resell.
- 4) Not applicable. This requirement is not applicable because the Applicants are not affiliated with a foreign carrier.
- 5) Applicants will notify the Commission as required, pursuant to 47 C.F.R. § 63.18 (h)(5), as to changes in their business, should they occur, that is regulated under 47 C.F.R. §§ 63.18(h)(3)-(4).
- 6) Not applicable. This requirement is not applicable because Applicants do not seek to operate as a facilities-based international carrier.
- 7) Not applicable. This requirement is not applicable because the Applicants are not affiliated with a foreign carrier.

8) Not applicable. This requirement is not applicable because the Applicants are not affiliated with a foreign carrier.

i) Applicants certify that they have not agreed to accept special concessions, as defined in 47 C.F.R. § 63.18 (i), directly or indirectly from any foreign carriers or administration with respect to traffic or revenue flows between the U.S. and any foreign country which the Applicants may serve under the authority granted under this part and will not enter into such agreements in the future.

j) Applicants certify that, to the best of their knowledge, information and belief, they are not subject to a denial of Federal Benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.



CONCLUSION

As demonstrated in this Application, the public interest, convenience and necessity would be furthered by grant of the Section 214 authorization requested by the Applicants. Applicants therefore respectfully request that the Commission grant their Application for authority to resell international telecommunications services between the United States and international locations.

Respectfully submitted,

By: 

R. Gerard Salemm  
Senior Vice President  
1730 Rhode Island Avenue NW, Suite 1000  
Washington, DC 20036

Dated: July 15, 1998

CERTIFICATION OF APPLICANT

(1) I hereby certify that I am an officer of NEXTLINK Florida, Inc., NEXTLINK Wisconsin, Inc., NEXTLINK District of Columbia, Inc., NEXTLINK Virginia, L.L.C., NEXTLINK Maryland, L.L.C., NEXTLINK Massachusetts, Inc., NEXTLINK Missouri, Inc., NEXTLINK Arizona, Inc., NEXTLINK Delaware, Inc., NEXTLINK Indiana, Inc., NEXTLINK Connecticut, Inc. and NEXTLINK Mississippi, Inc. and that the statements in the foregoing Application for Section 214 authority to provide international telecommunications services are true, complete and correct to the best of my knowledge and are made in good faith.

(2) No party to this application, as defined in 47 C.F.R. § 1.202(b), is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

By: 

Name: R. Gerard Salemme

Title: Senior Vice President

Date: July 15, 1998