

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: _____

FEDERAL COMMUNICATIONS COMMISSION
FCC REMITTANCE ADVICE
SEP 10 1998

Approved by OMB
3060-0589
Expires 2/28/97

FCC/MELLON

SEP 10 1998

PAGE NO. 1 OF 1

(RESERVED)

SPECIAL USE

FCC USE ONLY

ITC-214-19980910-00643

(Read instructions carefully BEFORE proceeding.)

PAYOR INFORMATION

(1) FCC ACCOUNT NUMBER	71145424044		Did you have a number prior to this? Enter it.	(2) TOTAL AMOUNT PAID (dollars and cents)
(3) PAYOR NAME (If paying by credit card, enter name exactly as it appears on your card)	ComCard International Ltd		\$ 745	00

(4) STREET ADDRESS LINE NO. 1	2231 E. Grand Avenue		(7) STATE	CA	(8) ZIP CODE	92705
(5) STREET ADDRESS LINE NO. 2			(10) COUNTRY CODE (if not U.S.A.)			

(6) CITY	Santa Ana	(9) ZIP CODE	92705
(9) DAYTIME TELEPHONE NUMBER (Include area code)	(714) 542-4044	(10) COUNTRY CODE (if not U.S.A.)	

ITEM #1 INFORMATION

(11A) NAME OF APPLICANT, LICENSEE, REGULTEE, OR DEBTOR	Com Card International Ltd		FCC USE ONLY	
(12A) FCC CALL SIGN/OTHER ID	(13A) ZIP CODE	(14A) PAYMENT TYPE CODE	(15A) QUANTITY	(16A) FEE DUE FOR PAYMENT TYPE CODE IN BLOCK 14
	92705	C U T	1	\$745.00
(17A) FCC CODE 1	(18A) FCC CODE 2			

(19A) ADDRESS LINE NO. 1	(20A) ADDRESS LINE NO. 2	(21A) CITY/STATE OR COUNTRY CODE
F.C.C. 214		Santa Ana CA

ITEM #2 INFORMATION

(11B) NAME OF APPLICANT, LICENSEE, REGULTEE, OR DEBTOR	FCC USE ONLY			
(12B) FCC CALL SIGN/OTHER ID	(13B) ZIP CODE	(14B) PAYMENT TYPE CODE	(15B) QUANTITY	(16B) FEE DUE FOR PAYMENT TYPE CODE IN BLOCK 14
				\$
(17B) FCC CODE 1	(18B) FCC CODE 2			

(19B) ADDRESS LINE NO. 1	(20B) ADDRESS LINE NO. 2	(21B) CITY/STATE OR COUNTRY CODE

CREDIT CARD PAYMENT INFORMATION

(22) MASTERCARD/VISA ACCOUNT NUMBER	[Grid of 16 boxes for account number]																
Mastercard	[Grid of 16 boxes for expiration date]																
Expiration Date:	[]	[]	[]	[]	[]	[]	[]	[]	[]	[]	[]	[]	[]	[]	[]	[]	[]

(23) I hereby authorize the FCC to charge my VISA or Mastercard for the service(s)/authorization(s) herein describe.	AUTHORIZED SIGNATURE	DATE
<input type="checkbox"/> Visa	[]	[]
<input type="checkbox"/> Mastercard	[]	[]

See public burden estimate on reverse.

September 8, 1998

VIA OVERNIGHT MAIL

Federal communications Commission
International Bureau
Telecommunications Division
P. O. Box 358115
Pittsburgh, PA. 15251-5115

Attention: Diane Cornell
International Bureau

Re: Authority of Comcard International Ltd (CCI), for Section 214
International Global Facilities-Based Authority and Global Resale
Authority

Dear Sir or Madam:

Enclosed for filing with the Commission are the original and six (6) copies of the application of Comcard International Ltd. (CCI) for authority pursuant to Section 214 of the Communications Act. CCI is requesting 1) global facilities-based authority to acquire interests in unaffiliated, U.S. owned circuits and half-circuits in authorized facilities to provide international telecommunications services between the United States and all international points; 2) global authority to resell international, switched services of all unaffiliated carriers to provide international switched services between the United States and all international points served by those carriers; 3) global authority to resell international private lines to provide international, private line services between the United States and all international points; and 4) authority to resell international private lines interconnected to the public switched network ("PSN") at one or both ends to provide international, switched services between the United States and all countries found to offer equivalent resell opportunities to U.S. carriers.

As required by the Commission's Rules, enclosed is a check in the amount of \$745.00, payable to the F.C.C. Please stamp-date the extra copy of this application and return it in the self-addressed, stamped envelope. Any questions regarding the enclosed application should be addressed to the undersigned.

Respectfully submitted,


Dewey L. Newman

Enclosures

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the matter of Comcard International Ltd. } File No. I-T-C-98 _____

Application for authority pursuant to }
Section 214 of the Communications Act }
of 1934, as amended, for global authority }
to operate as a facilities-based carrier and }
as an international resell carrier }
}

Comcard International (CCI) , by its undersigned director, hereby requests global authority, under Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. & 214 (1996), and Section 63.18 of the Commission's Rules, C.F.R. & 63.18 (1996), to provide international telecommunications services between the United States and various international points.

I. The Proposed International Services

CCI requests four types of authority in this application, all of which are eligible for streamlined processing. CCI specifically requests (1) global facilities-based authority pursuant to Section 63.18 (e) (1), to acquire ownership interests in unaffiliated, U.S. licensed facilities to provide international telecommunications services between the United States and all international points; (2) authority pursuant to Section 63.18 (e) (2) of the FCC's Rules, 47 C.F.R. & 63.18 (e)(2), to resell international, switched services of all authorized carriers to provide international switched services between the United States and all international points served thereby; (3) global authority pursuant to Section 63.18 (e)(2)(a) of the FCC's Rules, 47 C.F.R. 7 63.18 (e)(2)(B), to resell international private lines to provide international private line services between the United States and all international points, other than those requiring special authority because of their listing on the mostly recent exclusion list; and (4) authority pursuant to Section 63.18 (e)(2)(B) of the FCC's Rules, 47 C.F.R. & 63.18 (e)(2)(B), to resell international, private lines interconnected to the public switched network ("PSN") at one or both ends to provide international switched services between the United States and countries found to offer equivalent resell opportunities to U.S. carriers.

CCI is hereby requesting (a) facilities-based authority to obtain interests in U.S. authorized facilities, and connecting facilities not appearing on the Exclusion List; (b) authority to resell international private lines to provide international switched service between the United States and countries designated by the Commission to provide equivalent resell opportunities; and (c) authority to resell international, private lines to provide private line services to countries not appearing on the Exclusion List. CCI is not affiliated with any foreign carriers or administrations as defined in Part 63 of the Commission's Rules.

CCI will report its acquisition of interest in facilities, including earth stations, channels of communication to satellites, and submarine cables in its circuit addition/circuit status report files under Section 43.82 of the Commission's Rules 47 C.F.R. & 43.82. CCI will also report its resell of international, switched services and international private lines to provide international private line and switched services in its traffic reports filed pursuant to Section 43.61 of the Commission's Rules.

CCI believes that the added competition which its expanded market entry will bring to the market will benefit the consumers of the United States overseas services. These benefits include competitive pricing and increased availability of a variety of service options. A grant of this application will therefore, further the public interest.

II. The Applicant

CCI is a corporation organized and existing under the laws of Delaware. CCI is a privately held corporation and no CCI officer is an employee, agent, or representative of a foreign telecommunications entity. Further, CCI is not affiliated with any foreign carriers as defined by Part 63 of the Commission's Rules.

CCI is a new entrant in the telecommunications industry which has not previously received authority under Section 214 to provide any telecommunications services or operate any facilities which provide such services. Upon the grant of this application, CCI will become an authorized non-dominant facilities-based carrier subject to Section 214 of the Communications Act, as amended, and the Commission's Rules.

III. Public Interest Considerations

The Commission's publicly stated policy goals for the regulation of the United States

international telecommunications market to promote effective competition in the U.S. telecommunications market, including the market for the international telecommunications services, to prevent anti-competitive conduct in the provision for international services or facilities and to encourage foreign governments to open their communication markets. The Commission also has moved to establish an effective global communications market that could result in reduced rates, increased quality and new services. In addition, the Commission has found that effective competition directly advances the public interests and the Commission's paramount goal of making available a rapid, efficient, worldwide wire and radio communications service with adequate facilities at reasonable charges.

The grant of CCI's request for resale and facilities-based authority to provide international services will further the Commission's policies of facilitating increased competition within the U.S. international telecommunications services market and is therefore in the public interest.

IV. Information Required Under Section 63.18

As required under Section 63.18 of the Commission's Rules, CCI submits the following information:

- (a) Name and Address of Applicant
Comcard International Ltd.
2231 E. Grand Avenue
Santa Ana, CA. 92705
- (b) CCI is a corporation organized under the laws of the state of Delaware.
- (c) Correspondence concerning this application should be sent to:
Dewey Newman, Ph.D, Director
Comcard International Ltd.
11689 Newbridge Court
Reston, VA. 20191

- (d) CCI is a new entrant in the telecommunications industry. It has never received authority pursuant to Section 214 of the Communications Act of 1934, as amended, and under the Commission's Rules. CCI lacks market power that would allow control of prices to the detriment of market competition.


- (e) CCI requests Section 214 authority to: (1) operate as a facilities-based carrier pursuant to terms and conditions of Section 63.18 (e)(1); and (2) operate as a resale carrier pursuant to the terms and conditions of Section 63.18 (e)(2). Specifically, CCI seeks to (1) acquire capacity in full and half-circuits in submarine cables, and establish channels of communication with U.S. owned satellite systems, to provide international telecommunications services between the U.S. and all international points;(2) resell the international services of all authorized common carriers, except affiliated carriers regulated as dominant on the route to be served to provide international telecommunications services between the U.S. and all international points; (3) resell international private lines to provide international private line services between U.S. and all international points; and (4) resell international private lines for the provision of international switched services between the U.S. and all countries that the Commission finds provide U.S. carriers with effective competitive opportunities.
- (f) CCI does not seek authority to provide services which are not referenced under paragraph (e) of Section 63.18 of the Commission's Rules.
- (g) The authority requested in this application is categorically excluded from environmental processing as defined by Section 1.306 of the Commission's Rules, 47 C.F.R. & 1.306, obviating the need for an environmental assessment.
- (h) CCI certifies that it is not affiliated, either directly or indirectly, with any foreign carrier (as that part is defined in Part 63 of the Commission's Rules) or with any U.S. carriers whose facilities-based services it proposes to resell. Should the substance of the certification cease to be true, CCI shall notify the Commission immediately of any affiliation with any foreign carrier or any U.S. carriers whose services CCI seeks to resell.
- (i) No individual holds 10% or greater ownership or management interest in the corporation.

(j) As required by Section 63.18 (1) of the Commission's Rules, 47 C.F.R. & 63.18 (1), CCI certifies that it has not agreed to accept not shall it accept in the future special concessions as defined by the Commission's Rules, directly or indirectly from any foreign carrier or administration with respect to traffic or revenue flows between the U.S. and any foreign country for which CCI may be authorized to serve.

CONCLUSION

CCI is legally, financially, and technically qualified to provide the services for which it requests authority. For the reasons stated above, CCI affirms that the public interest, convenience, and necessity would be furthered by a grant of this Section 214 application.

Respectfully submitted,
Comcard International

By: 
Dewey Newman, Director
Comcard International Ltd.
11689 Newbridge Ct., Reston VA 20191

Dated: September 8, 1998

CERTIFICATION

I hereby certify that Comcard International Ltd. is not affiliated with any foreign carrier. CCI is not affiliated with any facilities-based carrier whose services it intends to resell. CCI 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 CCI may serve under the authority granted under this part and will not enter into such arrangements in the future.

To the best of my knowledge and belief, all statements made in this application are true and correct.

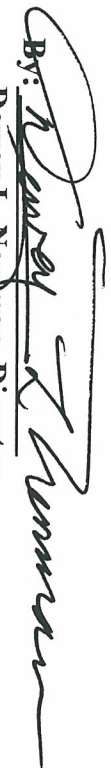


Dewey Newman, Director
Comcard International Ltd.
11689 Newbridge Ct.
Reston, VA 20191

ANTI-DRUG ABUSE CERTIFICATION

Applicant certifies that, to the best of its knowledge, information, and belief, neither applicant nor any party to this application is subject to a denial of federal radio licenses under Section 5301 of the Anti-Drug Abuse Act of 1988.

Respectfully submitted,

By: 

Dewey L. Newman, Director
Comcard International Ltd.
11689 Newbridge Ct.
Reston, VA 20191