

*K. Faten*

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

*ITC-214-19980918-00671*

- 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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*FEIS*

READ INSTRUCTIONS CAREFULLY  
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION  
REMITTANCE ADVICE

APPROVED BY OMB 3060-0585

(1) LOCKBOX #

FCC Form No. of **SEP 1 8 1998**

SPECIAL USE  
FCC USE ONLY

SECTION A - PAYER INFORMATION

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

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card)  
Donelan, Cleary, Wood & Maser, P.C.

(4) STREET ADDRESS LINE NO. 1

1100 New York Avenue, N.W., Suite 750 West

(5) STREET ADDRESS LINE NO. 2

ITC-214-19980918-00671

(6) CITY

Washington

(7) STATE

D.C.

(8) ZIP CODE

20005

(9) DAYTIME TELEPHONE NUMBER (include area code)

(202) 371-9500

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)

American Samoa License, Inc.

(12) STREET ADDRESS LINE NO. 1

6120 Windward Parkway Suite 200

(13) STREET ADDRESS LINE NO. 2

(14) CITY

Alpharetta

(15) STATE

GA

(16) ZIP CODE

30005

(17) DAYTIME TELEPHONE NUMBER (include area code)

(770) 752-7033

(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/OTHER ID

(20A) PAYMENT TYPE CODE (PTC)

C U T

(21A) QUANTITY

1

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

\$ 780.00

FCC USE ONLY

(19B) FCC CODE 1

(19B) FCC CALL SIGN/OTHER ID

(20B) PAYMENT TYPE CODE (PTC)

(21B) QUANTITY

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

(19B) FCC CODE 1

(19C) FCC CALL SIGN/OTHER ID

(20C) PAYMENT TYPE CODE (PTC)

(21C) QUANTITY

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

FCC USE ONLY

(19C) FCC CODE 1

(19D) FCC CALL SIGN/OTHER ID

(20D) PAYMENT TYPE CODE (PTC)

(21D) QUANTITY

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

FCC USE ONLY

(19D) FCC CODE 1

(24D) FCC CODE 2

SECTION D - TAXPAYER INFORMATION (REQUIRED)

(25) PAYER TIN

0 5 2 1 1 9 2 9 1 2

(25) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-11 IS DIFFERENT FROM PAYER NAME IN A-2

APPLICANT TIN 0 5 8 2 3 7 5 8 1 3

SECTION E - CERTIFICATION

(27) CERTIFICATION STATEMENT

I, DONALD J. ESKANDAR (PRINT NAME)

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

SIGNATURE

SECTION F - CREDIT CARD PAYMENT INFORMATION

(29) MASTERCARD/VISA ACCOUNT NUMBER:

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EXPIRATION DATE:

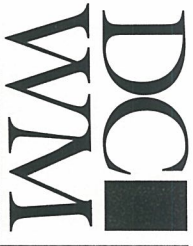

MASTERCARD

I hereby authorize the FCC to charge my VISA or MASTERCARD

VISA

AUTHORIZED SIGNATURE

SEE PUBLIC BURDEN ESTIMATE ON REVERSE



DONELAN CLEARLY  
WOOD & MASER, P.C.

September 17, 1998

Chief  
International Bureau  
Federal Communications Commission  
Washington, DC 20554

Re: Consolidated Application for Section 214 Certificate  
to Provide International Service and to Transfer  
Control of Such Certificate.

Dear Madame:

Transmitted herewith is an application for new Section 214 authority to provide non-dominant international service. As explained in the application, it is also anticipated that control of the applicant will transfer in the next sixty days (after approval is obtained from other FCC licensing authorities). Accordingly, in order to avoid an interruption or delay in service and to ensure consistency, this application also seeks approval for the same authority to transfer control which is being sought in the Wireless Bureau.

The requisite fee of \$780.00 is attached.

Please contact the undersigned should you have any questions regarding this matter.

Yours truly,  
  
Donald J. Evans

Enclosures

ATTORNEYS AND COUNSELORS AT LAW

1100 New York Avenue, Suite 750, N.W., Washington, D.C. 20005-3934, Tel: 202-371-9500, Fax: 202-371-0900

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

In regards to Application of  
American Samoa License, Inc.  
For a Certificate under § 214 to  
Provide international Service

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File No. ITC-214-19980918-00671

For authority under § 214 to Transfer  
Control of American Samoa License, Inc.

**APPLICATION FOR GLOBAL RESALE AUTHORITY UNDER § 214**

This application requests seeks authority under § 214 of the Communications Act of 1934, as amended and Section 63.18 of the Commissioner's rules, for American Samoa License, Incorporated ("ASL") to operate an international line of communications between points in the United States including American Samoa, and foreign points. At the same time, because a transfer of control of ASL is contemplated in the next ninety to one hundred days, authority is requested for the transfer of control of ASL from its parent's current ownership to Stanford Financial Group Co.<sup>1</sup> Pertinent information for both requested approvals, as required by Part 63 of the rules, is provided below.

I. New Certificate for ASL

- (a) American Samoa License, Incorporated  
Lafou Shopping Center Nu' u' uli Village  
P.O. Box 478  
Pago Pago, American Samoa 96799  
Phone: 011 684 699 6589
- (b) ASL is organized as a corporation under the laws of the Trust Territory of American Samoa.

<sup>1</sup> This transfer of control cannot occur until the Commission approves a separately pending application, submitted August 21, 1998, seeking approval by the Wireless Telecommunications Bureau of the transfer of control of ASL's authorization.

- (c) Points of contact:
- |  |  |
|--|--|
| David D. Lasier (President)<br>c/o TWS<br>6120 Windward Parkway<br>Alpharetta, GA 30005<br>Phone: (770) 752-7033 | William J. Sill (Legal Counsel)<br>Donelan, Cleary, Wood & Maser, P.C.<br>1100 New York Avenue, N.W.<br>Suite 750 West<br>Washington, D.C. 20005 |
|--|--|
- (d) The applicant has not previously been authorized under § 214 to provide service.
- (e) The applicant requests authority to operate as a non-dominant resale carrier pursuant to the terms and conditions of § 63.18(e)(2) to provide international basic switched, private line, data, television and business service to all international points in compliance with the limitations set forth in § 63.18(e)(2)(ii).
- (f) Not applicable
- (g) Not applicable
- (h) ASL certifies that it is not a foreign carrier and has no affiliation with any foreign carrier. It has no affiliation with any U.S.-based carrier whose facilities it proposes to resell.
- ASL's sole shareholder is:
- American Samoa Telecom, L.L.C. (a Georgia limited liability co.) ("AST")  
6120 Windward Parkway  
Suite 200  
Alpharetta, GA 30005
- AST's principal business is acquiring and operating telecommunications systems.
- AST is an 85% subsidiary of Telecom Wireless Solutions, Inc., a Delaware corporation with principal offices located at 6120 Windward Pkwy, Ste. 200, Alpharetta, GA 30005 ("TWS"). Communications International Corporation, a Washington corporation with principal offices at 717 West Sprague Avenue, Ste. 1600, Spokane, WA 99204-0466, holds 15% interest in AST.
- (1) TWS' primary businesses are:
- (a) providing quality radio frequency ("RF") engineering, network design, project management and financial services to the wireless telecommunications industry.
- (b) software distribution and development with its "Bulletin™" short messaging services (SMS) product line, and

(c) the purchase of equity interests in selected personal communications services (PCS) properties and the planning, design, build out and operation of their PCS networks, through affiliates such as Filer.

(2) TWS has issued and outstanding two classes of voting common stock, each with the same rights and privileges: Class A and Class B.

David D. Lasier, c/o TWS, 6120 Windward Pkwy., Ste. 200, Alpharetta, GA 30005 holds approximately 23.9% of TWS' issued and outstanding Class A and B common stock (US citizen).

Stanford International Bank Ltd ("SIB"), 5050 Westheimer, Houston, TX 77056 holds approximately 14.4% of TWS' issued and outstanding Class A and B common stock (non-US company); an affiliate of SIB, Bank of Antigua, St. Johns, Antigua (non-US company), holds approximately an additional 1.2% of TWS' issued and outstanding Class A and B common stock.

Class B Common stock

The following entity holds 10% or more of TWS' issued and outstanding Class B common stock:

Allen Telecom Inc., 25101 Chagrin Blvd., Beachwood, OH, holds approximately 13% of TWS' issued and outstanding Class B common stock (US corporation)

The names and addresses of TWS' President and directors are as follows:

President and Director: David D. Lasier, c/o TWS, 6120 Windward Pkwy,  
Alpharetta, GA 30005

Director: Hugh Sawyer, President, National Linen Services,  
Inc., 1420 Peachtree St. NE, Atlanta, GA 3030-3002;

Director: Gary Scheier, c/o TWS, 778 Frontage Road., Ste. 121,  
Northfield, IL 60093;

Director: James M. Davis, Chief Financial Officer  
Stanford Financial Group  
5050 Westheimer  
Houston, TX 77056

Director: Thomas Wardell, Esq., Long Aldridge Norman LLP,  
303 Peachtree Street, Atlanta, GA 30308.

Director: Dean Harwood, President, Gelber Securities, Inc.  
141 W. Jackson Blvd.  
Sute 1310A  
Chicago, IL 60604

Director:

Michael Lisogurski, Executive Vice President, Bell  
Canada International Inc.  
100 rue de la Gauchetière ouest  
#1100  
Montreal, Quebec, Canada H3B 4Y8

- (i) ASL certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market, and it will not enter into such agreements in the future.
- (j) 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.
- (k) This application seeks streamlined processing pursuant to Section 63.12 of the rules. The applicant is a non-dominant resale carrier and none of the exceptions set forth in Section 63.12 (c) apply.

## II. Transfer of Control of ASL

ASL is the licensee of a PCS system in American Samoa. An application to transfer control of ASL has been filed with the Commission and is expected to be processed and granted in due course. Since ASL desires to provide international service in addition to PCS service, this application for a new § 214 certificate and for approval to transfer control is being filed contemporaneously with the processing of the PCS transfer of control application.

ASL is wholly owned by American Samoa Telecom, LLC, ("AST"), a Georgia limited liability company. AST is in turn owned by Telecom Wireless Solutions, Inc., ("TWS") which owns an 85% interest and Communications International Corp. ("CIC") which owns a 15% interest. Stanford Financial Group Co. ("Stanford") proposes to convert an outstanding loan to AST into an 8.2% interest in AST. Concurrently with that conversion, Stanford will acquire approximately an additional 55.3% in AST. A company called Gelber Securities, Inc. ("Gelber") will also acquire a 1% interest in AST. When fully diluted, therefore, the ownership interests in AST will be as follows:

Stanford	63.5%
TWS	30.5%
CIC	5%
Gelber	1%

AST will continue to wholly own ASL, the entity for which certification is sought in Part I of this application.

Transferor Data:

a) American Samoa Telecom, LLC  
 6120 Windward Way  
 Suite 200  
 Alpharetta, GA 30005  
 Phone: (770) 752-7033

Transferee Data:

a) Stanford Financial Group Co.  
 5050 Westheimer  
 Stanford Financial Group Bldg.  
 Houston, TX 77056  
 Phone: (713) 964-5100

b) Georgia LLC

b) Florida Corporation

c) Contact: David D. Lasier, Chairman,  
 Board of Managers  
 6120 Windward Way  
 Suite 200  
 Alpharetta, GA 30005  
 (770) 752-7033  
 Counsel: William J. Sill  
 1100 New York Ave., N.W.  
 Suite 750 West  
 Washington, D.C. 20005

c) Contact: R. Allen Stanford, President  
 5050 Westheimer  
 Houston, TX 77056  
 (713) 964-5100  
 Counsel: Richard Rubbin, Esq.  
 Fleischman and Walsh, L.L.P.  
 1400 16<sup>th</sup> Street, N.W.  
 6<sup>th</sup> Floor  
 Washington, D.C. 20036  
 Phone: (202) 939-7900

- d) Original certificate for assignor's indirect subsidiary is requested in Part I authority. Stanford has no previous § 214
- e) The applicant requests authority to operate as a non-dominant resale carrier pursuant to the terms and conditions of § 63.18(e)(5) to provide international basic switched, private line, data television and business service to all international points in compliance with the limitations set forth in § 63.18(e)(2)(ii).



h) Stanford certifies that it is not a foreign carrier and has no affiliation with a foreign carrier. It has no affiliation with a U.S. carrier whose facilities ASL proposes to resell. Stanford is 100% owned by R. Allen Stanford, a U.S. citizen, whose address is 5050 Westheimer, Stanford Financial Group Bldg., Houston, Tx 77056. Stanford's principal business is financial planning and investment management.

i) Stanford certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses 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) Stanford certifies that it is not subject to the denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

Stanford Financial Group Co.

By \_\_\_\_\_

~~American Samoa~~ License, Incorporated

By  David D. Foster, President  
American Samoa Telecom, LLC

By  Richard A. Chen, Vice President  
General Counsel

h) Stanford certifies that it is not a foreign carrier and has no affiliation with a foreign carrier. It has no affiliation with a U.S. carrier whose facilities ASL proposes to resell. Stanford is 100% owned by R. Allen Stanford, a U.S. citizen, whose address is 5050 Westheimer, Stanford Financial Group Bldg., Houston, Tx 77056. Stanford's principal business is financial planning and investment management.

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j) Stanford certifies that it is not subject to the denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

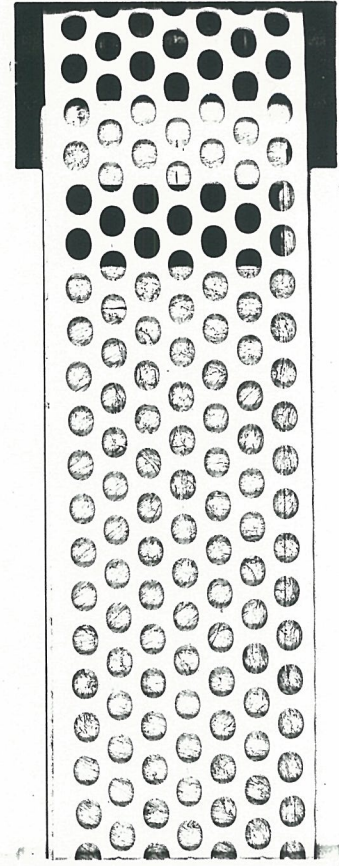
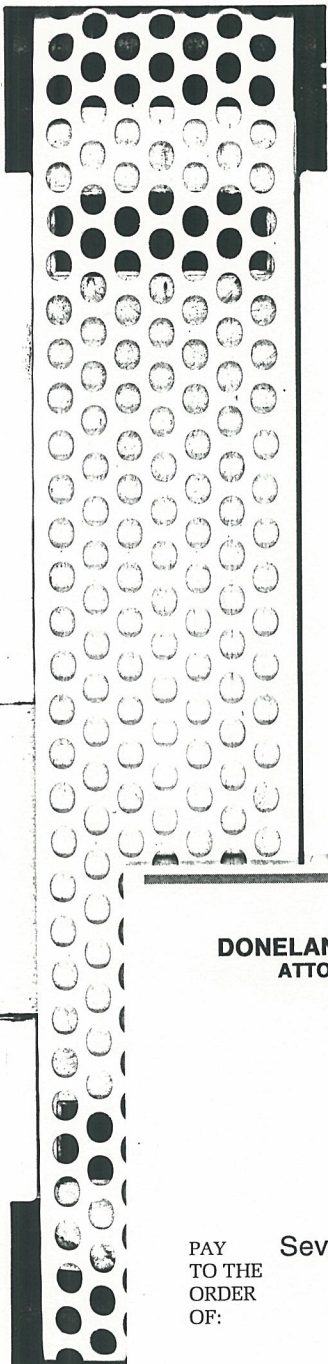
American Samoa License, Incorporated

By \_\_\_\_\_  
American Samoa Telecom, LLC

By \_\_\_\_\_

Stanford Financial Group Co.

By *Juanita N. Swartz*  
*Yolanda H. Swartz*  
Secretary



**DONELAN, CLEARY, WOOD & MASER, P.C.**  
 ATTORNEYS AND COUNSELORS AT LAW  
 1100 NEW YORK AVENUE, N.W.  
 WASHINGTON, DC 20005-3934

CRESTAR BANK, N.A.  
 15-52/540

5083

CHECK NO.  
 5083

DATE AMOUNT  
 Sep 17, 1998 \*\*\*\*\*780.00

PAY TO THE ORDER OF: Seven Hundred Eighty and 0/100 Dollars  
 Federal Communications Comm

DONELAN, CLEARY, WOOD & MASER, P.C.  
 VOID AFTER 182 DAYS

*Diane G. Hauslein*

AUTHORIZED SIGNATURE

MP

SECURITY FEATURES INCLUDED. DETAILS ON BACK.

005083 054000522 012047983