

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: _____

FD-1

READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING



APPROVED BY OMB 3060-0583

FCC/RETAIL
PAGE NO 1 of SEP 24 1998

SPECIAL USE
FCC USE ONLY

(1) LOCKBOX #

SECTION A - PAYER INFORMATION

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card) SKB Telecom Inc.
(3) TOTAL AMOUNT PAID (dollars and cents) \$ 780.00

(4) STREET ADDRESS LINE NO. 1

c/o Audrey P. Rasmussen, O'Connor & Hannan, L.L.P.

(5) STREET ADDRESS LINE NO. 2

1919 Pennsylvania Avenue, N.W., Suite 800

(6) CITY

Washington, D.C.

(7) STATE

(8) ZIP CODE

20006-3483

(9) DAYTIME TELEPHONE NUMBER (include area code)
(202) 887-1431

(10) COUNTRY CODE (if not in U.S.A.)

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)
SKB Telecom Inc.

(12) STREET ADDRESS LINE NO. 1

161 Stone Street

(13) STREET ADDRESS LINE NO. 2

(14) CITY

Watertown

(15) STATE

NY

(16) ZIP CODE

13601

(17) DAYTIME TELEPHONE NUMBER (include area code)
(315) 788-5300

(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 214 Application (20A) PAYMENT TYPE CODE (PTC) C U T (21A) QUANTITY 1 (22A) FEE DUE FOR (PTC) IN BLOCK 20A \$ 780.00 (23) FCC USE ONLY

(23A) FCC CODE 1

(24A) FCC CODE 2

(19B) FCC CALL SIGN/OTHER ID (20B) PAYMENT TYPE CODE (PTC) (21B) QUANTITY (22B) FEE DUE FOR (PTC) IN BLOCK 20B (23) FCC USE ONLY

(23B) FCC CODE 1

(24B) FCC CODE 2

(19C) FCC CALL SIGN/OTHER ID (20C) PAYMENT TYPE CODE (PTC) (21C) QUANTITY (22C) FEE DUE FOR (PTC) IN BLOCK 20C (23) FCC USE ONLY

(23C) FCC CODE 1

(24C) FCC CODE 2

(19D) FCC CALL SIGN/OTHER ID (20D) PAYMENT TYPE CODE (PTC) (21D) QUANTITY (22D) FEE DUE FOR (PTC) IN BLOCK 20D (23) FCC USE ONLY

(23D) FCC CODE 1

(24D) FCC CODE 2

SECTION D - TAXPAYER INFORMATION (REQUIRED)

(25) PAYER TIN 0650853674 (26) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-11 IS DIFFERENT FROM PAYER NAME IN A-31 APPLICANT TIN 0

(27) CERTIFICATION STATEMENT

SECTION E - CERTIFICATION

I, _____, (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 _____

SECTION F - CREDIT CARD PAYMENT INFORMATION

(28) MASTERCARD/VISA ACCOUNT NUMBER: _____ EXPIRATION DATE: _____
MONTH YEAR

MASTERCARD

VISA

I hereby authorize the FCC to charge my VISA or MASTERCARD
for the services/subscriptions herein described.

AUTHORIZED SIGNATURE

SEE PUBLIC BURDEN ESTIMATE ON REVERSE

FCC FORM 159 JULY 1997 (REVISED)

O'CONNOR & HANNAN, L.L.P.
ATTORNEYS AT LAW

Audrey P. Rasmussen
Direct Dial (202) 887-1431
Internet: apr@oh-mail.com

SUITE 800
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FAX (202) 466-2198

MINNEAPOLIS OFFICE
706 SOUTH SECOND AVENUE
MINNEAPOLIS BUILDING
MINNEAPOLIS, MN 55402
TEL (612) 341-2596
FAX (612) 343-1256

MAJOR OFFICE
LA RINGONADA 6, 3^a
10012 3408018, SPAIN
TEL (91) 341-3500
(91) 341-357-2251
FAX (91) 341-577-0759

September 22, 1998

Federal Communications Commission
Common Carrier International
c/o Mellon Bank
Three Mellon Bank Center
525 William Penn Way
27th Floor, Room 153-2713
P.O. Box 358115
Pittsburgh, PA 15251-5115

Re: Application of SKB Telecom Inc. for Authority, Pursuant to
§214 of the Communications Act of 1934, As Amended, to
Resell Services of Other Common Carriers to Provide Services
from the United States to International Points

To The Commission:


Enclosed is an application for §214 Authority as identified above.

Associated with the application is the FCC Form 159, FCC Remittance Advice, and a check in the amount of \$780.00 payable to the FCC to cover the required filing fee.

It is respectfully requested that this application be processed pursuant to the procedures for streamline processing outlined in §63.12 of the Commission's Rules.

Any questions concerning the enclosed material may be directed to the undersigned.

Very truly yours,


Audrey P. Rasmussen

gln
Enclosures

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

In the Matter of

SKB TELECOM INC

FILE NO. ITC-98-____

Application for Authority Pursuant to Section 214
of the Communications Act of 1934, as amended,
to Provide Global Resale Services in Accordance
with the Provisions of Section 63.18 of the Rules

**APPLICATION
FOR
AUTHORITY**

SKB Telecom Inc. ("SKB"), pursuant to Section 214 of the Communications Act of 1934, as amended, (47 U.S.C. §214) and §63.18 of the Commission's Rules and Regulations (47 C.F.R. §63.18), hereby applies for such authority as may be required to resell the international switched services of other common carriers between the United States and international points as well as authority to resell private line service as contemplated by §63.18(e)(2) of the Rules.

Introduction

SKB Telecom Inc. is a corporation organized under the laws of the State of Delaware. It intends to resell telecommunications facilities of other common carriers. It is not a facilities-based carrier. Service will be offered to customers from domestic locations and additionally through toll-free access, customers may originate calls from wide-spread locations within the United States to other countries. SKB seeks authority to

resell international communications services to better serve its customers with a full range of call termination options.

The international telecommunications services will be obtained from other common carriers currently authorized by the Federal Communications Commission to provide such services. SKB requests authority to resell international switched services as well as authority to resell private line service as contemplated by §63.18(e)(2) of the Rules subject to the restrictions imposed therein.

SKB will introduce additional competition in the international services market thereby benefiting consumers of international communications services with lower prices, increased availability and a variety of service options. Thus, the grant of the requested authorization is consistent with the public interest.

Information in Support of Application

As required by §63.18 of the Commission's Rules, 47 C.F.R. §63.18, the following is shown:

- (a) The Name, Address and Telephone Number of the Applicant:
- SKB Telecom Inc.
225 Golden Beach Drive
Golden Beach, Florida 33160
(315) 788-5300
- (b) SKB is a corporation organized under the laws of the State of Delaware.
- (c) Correspondence concerning the application should be addressed to:

Bart S. Bonner, President
SKB Telecom Inc.
161 Stone Street
Watertown, New York 13601
(315) 788-5300

With copies of all correspondence to:

Audrey P. Rasmussen, Esquire
O'Connor & Hannan, L.L.P.
1919 Pennsylvania Avenue, N.W.
Suite 800
Washington, D.C. 20006-3483

(d) SKB does not currently hold Section 214 authority. However, as a reseller of international switched services, SKB will be subject to Section 214 and the rules and policies applicable thereto.

(e) SKB requests Section 214 authority to operate as a resale carrier as provided for by §63.18(e)(2) of the Rules. SKB proposes to resell the international services of any authorized common carrier pursuant to tariff or contract duly filed with the Federal Communications Commission for the provision of international basic switched, private line, data and business service to all international points as authorized by the Federal Communications Commission from time to time.

(f) See Item (e) above.

(g) SKB does not seek facilities-based authority under §63.18(e)(6) of the Rules.

(h) SKB certifies that it is not a foreign carrier nor is it affiliated with any foreign carrier. SKB further certifies that it has no affiliation with any U.S. carriers whose facilities-based services SKB proposes to sell. See Certifications associated with this Application.

The following entities have an ownership interest of 10% or greater in SKB:

<u>Name</u>	<u>Citizenship</u>	<u>Ownership</u>
Bart and Lisa Bonner	U.S.	37.5%
ComHONE International ¹	U.S.	37.5%

¹ ComHONE International is a 100% foreign owned corporation organized in France. Each of its shareholders hold less than 10% of the stock of the corporation.

Keith Newkirk

U.S.

25%

(i) SKB certifies that it has not agreed to accept special concessions from any foreign carrier or administration and that it will not enter into such agreements in the future. See Certifications associated herewith.

(j) The applicant certifies that neither it nor any party to this application is subject to denial of federal benefits under the Anti-Drug Abuse Act of 1988. See associated Certifications.

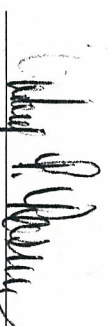
Conclusion

As demonstrated herein, SKB is legally, financially and technically qualified to provide the services for which it seeks authority and for the reasons stated above, SKB submits that grant of this application would serve the public interest, convenience and necessity.

Respectfully submitted,

SKB TELECOM, INC.

By:



Audrey H. Rasmussen
Its Attorney

O'Connor & Hannan, L.L.P.
1919 Pennsylvania Avenue, N.W.
Suite 800
Washington, D.C. 20006-3483
(202) 887-1431

Dated: September 22, 1998

69038_1.DOC


CERTIFICATIONS

The following Certifications are in support of the associated SKB Telecom Inc. application for resale authority:

1. I have read the foregoing application for resale authority and the statements contained therein are true and correct to the best of my knowledge, belief and information.
2. I hereby certify that SKB Telecom Inc. has no affiliation with any foreign carrier, nor does it have any affiliation with any U.S. facilities-based carrier whose services it proposes to resell.
3. I certify that SKB Telecom Inc. has not agreed to accept special concessions directly or indirectly from any foreign carrier or administration with respect to tariff or revenue flows between the U.S. and any foreign country which SKB may serve under the authority pursuant to this application and will not enter into such agreements in the future.
4. I hereby further certify that neither SKB Telecom Inc. nor any party to this application has ever been denied any federal benefit pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

Respectfully submitted,

SKB TELECOM INC.

By 
Bart S. Bonner

Its: President

Dated: , 1998

O'CONNOR & HANNAN, L.L.P.
Attorneys at Law
Suite 800

1919 Pennsylvania Avenue, N.W.
Washington, D.C. 20006-3483
(202) 887-1400
FAX (202) 466-2198

TELECOMMUNICATION COVER PAGE

DATE: October 28, 1998

TO: Fran Eisenstein

FAX No. : 418-2824

FROM: Audrey P. Rasmussen

TOTAL PAGES (includes cover page) : 2

Comments: As we discussed, here is the revision on the SKB Telecom Inc. Application. If you have any questions, please give me a call. Thank you, Audrey Rasmussen

IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL (202) 778-2127.

Notice of Confidentiality: The information contained in and transmitted with this facsimile is (1) subject to the Attorney-Client Privilege; (2) Attorney Work Product; or (3) Confidential. It is intended only for the individual or entity designated above. You are hereby notified that any dissemination, distribution, copying, or use of or reliance upon the information contained in and transmitted with this facsimile by or to anyone other than the recipient designated above by the sender is unauthorized and strictly prohibited. If you have received this facsimile in error, please notify O'CONNOR & HANNAN, L.L.P. by telephone (202) 778-2127 immediately. Any facsimile erroneously transmitted to you should be immediately returned to sender by U.S. Mail, or if authorization is granted by sender, destroyed.

CLIENT/MATTER NO. : 31902-001

With copies of all correspondence to:

Audrey P. Rasmussen, Esquire
O'Connor & Hannan, L.L.P.
1919 Pennsylvania Avenue, N.W.
Suite 800
Washington, D.C. 20006-3483

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(f) See Item (c) above.

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(h) SKB certifies that it is not a foreign carrier nor is it affiliated with any foreign carrier. SKB further certifies that it has no affiliation with any U.S. carriers whose facilities-based services SKB proposes to sell. See Certifications associated with this Application.

The following entries have an ownership interest of 10% or greater in SKB:

<u>Name</u>	<u>Citizenship</u>	<u>Ownership</u>
Bart and Lisa Bonner	U.S.	100%