

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

Subsidized
Per call NA

Description of Application: _____

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VIA COURIER

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

Attention: Troy Tanner, Chief, Policy and Facilities Branch, International Bureau

Re: Application of RCN Telecom Services, Inc., on behalf of its subsidiaries, RCN Telecom Services of Arizona, Inc., RCN Telecom Services of California, Inc., RCN Telecom Services of Nevada, Inc. and all Future Wholly Owned U.S. Subsidiaries, for Global Authority Pursuant to Section 214 of the Communications Act of 1934, As Amended, to Operate as International Facilities-based Carriers and as International Resale Carriers

Dear Sir or Madam:

Enclosed for filing with the Commission are an original and six (6) copies of the application of RCN Telecom Services, Inc. requesting global authority on behalf of, and in order to enable, its subsidiaries, RCN Telecom Services of Arizona, Inc., RCN Telecom Services of California, Inc., RCN Telecom Services of Nevada, Inc., and all future wholly owned U.S. subsidiaries of RCN Telecom Services, Inc., to operate as international facilities-based carriers and international resale carriers between the United States and various international points pursuant to Section 214 of the Communications Act of 1934, as amended.

As required by the Commission's Rules, a check in the amount of \$780.00 is enclosed. Please date-stamp the extra copy of this application and return it in the enclosed self-addressed, stamped envelope. Any questions regarding the enclosed application should be addressed to the undersigned.

Respectfully submitted,



Jean L. Kiddoo
Kathy L. Cooper
Rachel D. Flam

Counsel for RCN Telecom Services, Inc.

Enclosures

cc: Michael J. Mahoney

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

In the Matter of

RCN TELECOM SERVICES, INC.

Application on behalf of its Subsidiaries, RCN)	File No. I-T-C-98-_____
Telecom Services of Arizona, Inc., RCN Telecom)	
Services of California, Inc., RCN Telecom)	
Services of Nevada, Inc., and all Future Wholly)	
Owned U.S. Subsidiaries Pursuant to Section)	97
214 of the Communications Act of 1934,)	
as amended, for Global Authority to Operate)	
as International Facilities-based and)	
International Resale Carriers)	
)	

APPLICATION

RCN Telecom Services, Inc. ("Applicant"), by its undersigned counsel, hereby requests, on behalf of its subsidiaries, RCN Telecom Services of Arizona, Inc. ("RCN-AZ"), RCN Telecom Services of California, Inc. ("RCN-CA"), RCN Telecom Services of Nevada, Inc. ("RCN-NV), and any future wholly owned subsidiaries of Applicant organized under the laws of any State of the United States (collectively, "Subsidiaries"), "global" authority pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, and Section 63.18 of the Commission's Rules, 47 C.F.R. § 63.18 (1996), to enable each of the Subsidiaries to provide international telecommunications services between the United States and international points (other than those excluded by the Exclusion List, where applicable).^{1/} Grant of the Applicants' request will directly

^{1/} Applicant has, itself, already been granted "global" Section 214 authority to operate as an (continued...)

further the Commission's policies of bringing increased competition to the United States international telecommunications services market and is, therefore, in the public interest. Pursuant to 47 C.F.R. § 63.12, this application is eligible for streamlined processing.

Information Required under Section 63.18

As required by Section 63.18 of the Commission's Rules, the Applicant submits the following information:

- (a) Name, address and telephone number:
- RCN Telecom Services, Inc.
105 Carnegie Center
Princeton, N.J. 08540
(609) 734-7500
 - RCN Telecom Services of Arizona, Inc. ✓
105 Carnegie Center
Princeton, N.J. 08540
(609) 734-7500
 - RCN Telecom Services of California, Inc. ✓
105 Carnegie Center
Princeton, N.J. 08540
(609) 734-7500
 - RCN Telecom Services of Nevada, Inc.
105 Carnegie Center

^{1/} (... continued)
international facilities-based and resale carrier. See *Application of RCN Telecom Services, Inc., RCN Telecom Services of Delaware, Inc., RCN Telecom Services of New Jersey, Inc., db/a RCN of New Jersey, RCN Telecom Services of Maryland, Inc., db/a RCN of Maryland, RCN Telecom Services of Virginia, Inc., RCN Telecom Services of Washington D.C., Inc. for Global Authority Pursuant to Section 214 of the Communication Act of 1934, as amended, to Operate as Facilities-Based and Resale Carriers*, File No. ITC-97-425 (effective September 5, 1997). Accordingly, Applicant is not, by this application, seeking authority on its own behalf. Instead, by this application, Applicant seeks the authority requested herein for the Subsidiaries.

Princeton, N.J. 08540
(609) 734-7500

As noted above, RCN Telecom Services, Inc. also seeks the authority stated herein on behalf of all future wholly owned subsidiaries of RCN Telecom Services, Inc. formed under the laws of any state of the United States.

- (b) Applicant is a corporation organized under the laws of the State of Delaware. RCN-AZ, RCN-CA and RCN-NV are corporations organized under the laws of the States of Arizona, California, and Nevada, respectively. The future wholly owned subsidiaries of Applicant for which the authority specified herein in sought will be organized under the laws of a State of the United States.

- (c) Correspondence concerning this application should be sent to:

Jean L. Kiddoo, Esq.
Kathy L. Cooper, Esq.
Rachel D. Flam, Esq.
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
Telephone: (202) 424-7790
Facsimile: (202) 424-7645

with a copy to:

Michael J. Mahoney, President and Chief Operating Officer
RCN Corporation
105 Carnegie Center
Princeton, N.J. 08540
(609) 734-7500

- (d) Applicant is, itself, already an authorized non-dominant facilities-based carrier and reseller with global authority, subject to Section 214 of the Communications Act of 1934, as amended, and the Commission's Rules. Upon grant of this application, each of the Subsidiaries will become authorized non-dominant facilities-based carriers and resellers with global authority, subject to Section 214 of the Communications Act of 1934, as amended, and the Commission's Rules. Each of the Subsidiaries lacks the market power that would allow it to control prices to the detriment of market competition.

(e) Applicant hereby requests, on behalf of each of the Subsidiaries, four types of authority, all of which are eligible for streamlined processing.^{2/} Specifically, on behalf of each of the Subsidiaries, Applicant requests: (1) global facilities-based authority pursuant to Section 63.18(e)(1) of the FCC's Rules, 47 C.F.R. § 63.18(e)(1), to acquire interests in United States-authorized facilities as well as necessary connecting facilities to provide international telecommunications services between the United States and all international points except those countries excluded by the Exclusion List;^{3/} (2) global authority pursuant to Section 63.18(e)(2) of the FCC's Rules, 47 C.F.R. § 63.18(e)(2), to resell the international switched services of all United States-authorized carriers, other than those affiliated carriers with market power on a particular route, to provide international switched services between the United States and all international points served by those carriers; (3) global authority pursuant to Section 63.18(e)(2) of the FCC's rules, 47 C.F.R. § 63.18(e)(2), to resell international private lines to provide international non-interconnected private line services between the United States and all international points; and (4) authority pursuant to Section 63.18(e)(2) of the FCC's Rules, 47 C.F.R. § 63.18(e)(2), to resell international private lines interconnected to the public switched network ("PSN") at one or both ends to provide international switched services on all international routes on which the Commission permits such services to be provided.^{4/}

^{2/} See *Streamlining the International 214 Authorization Process and Tariff Requirements*, IB Docket No. 95-118, FCC 96-79 (released March 13, 1996) (adopting streamlined 35-day processing procedures for certain international resale applications) ("*Streamlining Order*"); 47 C.F.R. § 63.12 (1996); see also *Rules and Policies on Foreign Market Participation in the U.S. Telecommunications Market*, IB Docket 97-142, *Report and Order on Reconsideration*, FCC 97-398 at ¶¶ 21, 322-29 (rel. Nov. 27, 1997) ("*Foreign Market Participation Order*").

^{3/} Applicant seeks for the Subsidiaries only authority to own circuits on facilities not excluded by the Exclusion List.

^{4/} The FCC will automatically amend all Section 214 authorizations to permit carriers to resell international private lines to provide international switched services between the United States and other countries as provision of such services becomes permitted by the Commission. See *Streamlining Order* at ¶ 34. Cf. *Foreign Market Participation Order* at ¶¶ 29-86 (declaring that, upon the effective date of the Commission's new rules, carriers reselling international private lines interconnected to the public switched network to provide international switched services between the U.S. and WTO Member countries will no longer have to meet the equivalency test if settlement rates for at least 50 percent of the U.S.-billed traffic on the route or routes in question are at or below the relevant benchmark posted in the Commission's *Benchmarks Order*). Cf. also *International Settlement Rates*, IB Docket 96-261, *Report and Order*, FCC 97-280 (rel. Aug. 18, 1997) (continued...)

- (f) Applicant seeks, for the Subsidiaries, authority to provide only services 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 1.1306 of the Commission's Rules, 47 C.F.R. § 1.1306. As such, an environmental assessment is not required for purposes of this application and is therefore not attached.
- (h) The Applicant and each of RCN-AZ, RCN-CA and RCN-NV certifies that they are not affiliated with any dominant United States carriers whose facilities-based services they propose to resell.

Applicant and the Subsidiaries are indirectly affiliated with Megacable, S.A. de C.V. ("Megacable"), a corporation in Mexico that provides cable television in twenty two (22) Mexican cities. Megacable is partly owned by RCN International Holdings, Inc., a wholly owned subsidiary of RCN Corporation, an indirect parent of the Applicant and the Subsidiaries. On August 18, 1997, Megacable received authorization from the Mexican authorities to provide local telephone service in Mexico City, Guadalajara, and Monterey. Currently, Megacable does not provide facilities-based local telephone service in Mexico, nor does it currently provide international services. Although Megacable does plan to offer facilities-based local exchange services in the near future, Megacable is a non-dominant carrier that does not now, and will not in the future, control bottleneck services or facilities in Mexico. Accordingly, Megacable does not have, nor will it have, the ability to discriminate against unaffiliated United States international carriers through control of bottleneck facilities in Mexico.⁵¹

⁴¹ (...continued)
("Benchmarks Order").

⁵¹ Commission staff has previously considered Megacable's activities in the context of Section 214 global authority applications filed by Starpower Communications, LLC and RCN-BecoCom, LLC. In each case, the applications were processed on a streamlined basis and granted. See *Application of Starpower Communications, LLC for Global Authority Pursuant to Section 214 of the Communications Act of 1934, as amended, to Operate as a Facilities-Based and Resale Carrier*, File No. ITC-98-065 (accepted for streamlined processing Jan. 28, 1998; authorization effective March 4, 1998); *Application of RCN-BecoCom, LLC for Global Authority Pursuant to Section 214 of the Communications Act of 1934, as amended, to Operate as a Facilities-Based and Resale Carrier*, File No. ITC-97-661 (accepted for streamlined processing Nov. 7, 1997; authorization effective Dec. 18, 1997).

An interlocking directorate report for Applicant and Subsidiaries RCN-AZ, RCN-CA and RCN-NV is appended hereto as Attachment A.

The following individuals hold a ten percent (10%) or greater direct or indirect shareholder or other equity interest in the **Subsidiaries RCN-AZ, RCN-CA, and RCN-NV:**

Name: RCN Telecom Services, Inc. (Applicant)
Address: 105 Carnegie Center
Princeton, NJ 08540
Telephone: (609) 734-7500
Percentage Held: 100%
Citizenship: United States
Principal Business: Telecommunications

The following individuals hold a ten percent (10%) or greater direct or indirect shareholder or other equity interest in **Applicant RCN Telecom Services, Inc.:**

Name: RCN Telecom Services of Pennsylvania, Inc. d/b/a RCN of Pennsylvania
Address: 105 Carnegie Center
Princeton, NJ 08540
Telephone: (609) 734-7500
Percentage Held: 100%
Citizenship: United States
Principal Business: Telecommunications

The following individuals hold a ten percent (10%) or greater direct or indirect shareholder or other equity interest in **RCN Telecom Services of Pennsylvania, Inc. d/b/a RCN of Pennsylvania:**

Name: RCN Corporation
Address: 105 Carnegie Center
Princeton, NJ 08540
Telephone: (609) 734-7500
Percentage Held: 100%
Citizenship: United States
Principal Business: Telecommunications

The following individuals hold a ten percent (10%) or greater direct or indirect shareholder or other equity interest in **RCN Corporation:**

Name: Level 3 Telecom Holdings, Inc.
Address: 3555 Farnam Street
Omaha, NE 68131
Telephone: 402-536-3613
Percentage Held: 45%
Citizenship: United States
Principal Business: Telecommunications

The following individuals hold a ten percent (10%) or greater direct or indirect shareholder or other equity interest in **Level 3 Telecom Holdings, Inc.**:

Name: Level 3 Holdings
Address: 3555 Farnam Street
Omaha, NE 68131
Telephone: 402-536-3613
Percentage Held: 90%
Citizenship: United States
Principal Business: Telecommunications

Name: David C. McCourt
Address: 105 Carnegie Center
Princeton, NJ 08540
Telephone: (609) 734-3700
Percentage Held: 10%
Citizenship: United States
Principal Business: Telecommunications

The following individuals hold a ten percent (10%) or greater direct or indirect shareholder or other equity interest in **Level 3 Holdings**:

Name: PKS Information Services, Inc.
Address: 11707 Millock Hills Drive
Omaha, NE 68144
Telephone: 402-498-8250
Percentage Held: 100%
Citizenship: United States
Principal Business: Information Services

The following individuals hold a ten percent (10%) or greater direct or indirect shareholder or other equity interest in **PKS Information Services, Inc.**:

Name: Level 3 Communications, Inc.

Address: 3555 Farnam Street, 14th Floor
Omaha, Nebraska 68131
Telephone: (402) 342-2052
Percentage Held: 100%
Citizenship: United States
Principal Business: Telecommunications

The following individuals currently hold a ten percent (10%) or greater direct or indirect shareholder or other equity interest in **Level 3 Communications, Inc.:**

Name: Walter Scott, Jr.
Address: 1000 Kiewit Plaza
Omaha, NE 68131
Telephone: 402-342-2052
Percentage Held: 12.0%
Citizenship: USA
Principal Business: Telecommunications

(i) Pursuant to Section 63.18 (i) of the Commission's Rules, 47 C.F.R. § 63.18(i), the Applicant and each of RCN-AZ, RCN-CA and RCN-NV certify that they have not agreed to accept nor shall they accept in the future any 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 United States and any foreign country which they are or may be authorized to serve.

(j) Neither the Applicant or any of RCN-AZ, RCN-CA and RCN-NV are subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. A certification pursuant to Section 1.2002 of the Commission's Rules (implementing the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 3301) for each is attached.

(k) Neither the Applicant or any of the Subsidiaries are affiliated, as that term is defined by Part 63 of the Commission's Rules and the Commission's recent revisions of Part 63,⁶¹ with any dominant United States carriers whose international services they will resell. None of the Subsidiaries seeks to serve any country in which they have a facilities-based affiliate with market power. Applicant and the Subsidiaries are indirectly affiliated with Megacable; however, as noted above, Megacable does not now have, nor will it have in the future, the ability to discriminate against unaffiliated

⁶¹ *Market Entry and Regulation of Foreign-affiliated Entities, Report & Order*, 11 FCC Rcd 3873 (1995).

United States international carriers through control of bottleneck services or facilities in Mexico. The Subsidiaries should, therefore, each be classified as nondominant carriers for the provision of the services for which authority is requested in this application. Moreover, none of the Subsidiaries seeks authority to use facilities on the Exclusion list or to provide international telecommunications services, pursuant to Section 63.18(e)(1) of the FCC's Rules, 47 C.F.R. § 63.18(e)(1), between the United States and countries excluded by the Exclusion List. This application is, accordingly, eligible for streamlined processing.⁷¹

⁷¹ See *Streamlining Order*, 47 C.F.R. § 63.12 (1996).

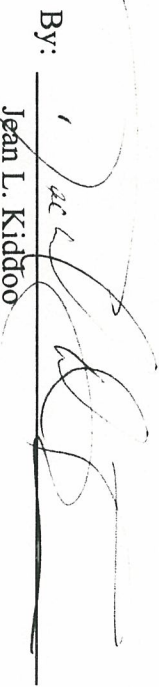
CONCLUSION

For the reasons stated above, RCN Telecom Services, Inc. respectfully submit that the public interest, convenience and necessity would be furthered by a grant of this Section 214 application.

Respectfully submitted,

RCN TELECOM SERVICES, INC.

By: _____


Jean L. Kiddoo
Kathy L. Cooper
Rachel D. Flam

Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
Tel: (202) 424-7790
Fax: (202) 424-7645

Its Counsel

Dated: October 2, 1998

ATTACHMENT A

**INTERLOCKING DIRECTORATE REPORT
of
RCN TELECOM SERVICES, INC.,
RCN-AZ, RCN-CA, and RCN-NV**

Interlocking Office/Director	Title/Position	Companies
David C. McCourt	Director, Chairman, CEO	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& other RCN Corporation Subsidiaries*) RCN Corporation Commonwealth Telephone Enterprises, Inc. Commonwealth Telephone Enterprises, Inc. Subsidiaries** Level 3 Communications, Inc. Cable Satellite Public Affairs Network (C-SPAN) Metropolitan Fiber Systems/McCourt, Inc.
Michael J. Mahoney	President, COO Director, President, COO Director	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& other RCN Corporation Subsidiaries) RCN Corporation Commonwealth Telephone Enterprises, Inc.
Dennis J. Spina	Vice Chairman, President of Internet Services	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& other RCN Corporation Subsidiaries)
Michael A. Adams	Executive Vice President, President of the Technology & Network Development Group	RCN Telecom Services, Inc., RCN-AZ, RCN-CA RCN-NV (& other RCN Corporation Subsidiaries) RCN Corporation
Mark Haverkate	Executive Vice President, Business Development	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& other RCN Corporation Subsidiaries) RCN Corporation
Bruce C. Godfrey	Executive Vice President, CFO, Corporate Secretary Director, Executive Vice President, CFO, Secretary	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& other RCN Corporation Subsidiaries) Commonwealth Telephone Enterprises, Inc. Subsidiaries RCN Corporation Commonwealth Telephone Enterprises, Inc.
Salvatore M. Quadrino	Chief Administrative Officer	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& other RCN Corporation Subsidiaries)

Interlocking Office/Director	Title/Position	Companies
John D. Filipowicz	Senior Vice President, Assistant General Counsel & Assistant Secretary	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& other RCN Corporation Subsidiaries) RCN Corporation Commonwealth Telephone Enterprises, Inc. Commonwealth Telephone Enterprises, Inc. Subsidiaries
John J. Gdovin	Senior Vice President	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& other RCN Corporation Subsidiaries)
Timothy J. Stoklosa	Senior Vice President, Treasurer	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& other RCN Corporation Subsidiaries) RCN Corporation Commonwealth Telephone Enterprises, Inc. Commonwealth Telephone Enterprises, Inc. Subsidiaries
Kenneth Knudsen	Senior Vice President of Marketing and Sales	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& RCN Corporation Subsidiaries) RCN Corporation
Michael H. Brody	Senior Vice President, Technical Operations	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& RCN Corporation Subsidiaries)
Timothy Wyllic	Senior Vice President, Construction	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& RCN Corporation Subsidiaries)
D. G. Gulati	Senior Vice President of Technology Network Development Group	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& RCN Corporation Subsidiaries)
Michael Berkley	Senior Vice President, Chief Information Officer	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& RCN Corporation Subsidiaries) RCN Corporation
Malcolm M. Burnside	Senior Vice President of Regulatory Affairs	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& RCN Corporation Subsidiaries)
Ralph S. Hromisin	Vice President, Chief Accounting Officer	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& RCN Corporation Subsidiaries) RCN Corporation Commonwealth Telephone Enterprises, Inc. Commonwealth Telephone Enterprises, Inc. Subsidiaries
James J. Saile	Vice President of Taxation	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& RCN Corporation Subsidiaries) RCN Corporation Commonwealth Telephone Enterprises, Inc. Commonwealth Telephone Enterprises, Inc. Subsidiaries
Wairman Lee	Vice President of Information Technology	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& RCN Corporation Subsidiaries)
Kevin McKenzie	Vice President of Sales	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& RCN Corporation Subsidiaries)

Interlocking Office/Director	Title/Position	Companies
Thomas K. Steel, Jr.	Vice President of Municipal Relations	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& RCN Corporation Subsidiaries)
Fernando Duenas	Vice President of Facilities	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& RCN Corporation Subsidiaries)
Jean Daniels	Vice President of Customer Service	RCN Telecom Services, Inc., RCN-AZ, RCN-CA, RCN-NV (& RCN Corporation Subsidiaries)

NOTES

* As used herein, the term "RCN Corporation Subsidiaries" refers to the following companies:

RCN Financial Management, Inc.	RCN Telecom Services of Pennsylvania, Inc.
RCN Long Distance Company	RCN International Holdings, Inc.
C-TEC Financial Services, Inc.	RCN Telecom Services of California, Inc.
RCN Telecom Services of Delaware, Inc.	RCN Telecom Services of Illinois, Inc.
RCN Telecom Services of Massachusetts, Inc.	RCN-Becom, L.L.C.
RCN Telecom Services of Maryland, Inc.	RCN Telecom Services of Michigan, Inc.
RCN Telecom Services of New York, Inc.	FNY Holdings Company, Inc.
Freedom New York L.L.C.	RCN Financial Services, Inc.
RCN Corporate Services, Inc.	RCN Telecom Services of New Jersey, Inc.
RCN Telecom Services of Virginia, Inc.	RCN Telecom Services of Philadelphia, Inc.
RCN Telecom Services of Washington, Inc.	RCN Telecom Services of Washington, D.C., Inc.
RCN Operating Services, Inc.	RCN Telecom Services of Maine, Inc.
RCN Telecom Services of New Hampshire, Inc.	RCN Telecom Services of Connecticut, Inc.
RCN Telecom Services of Vermont, Inc.	RCN Telecom Services of Rhode Island, Inc.
RCN Services, Inc.	RCN Cable Systems, Inc.
RCN of Southeast New York, Inc.	RCN of New Jersey, Inc.
Home Link Communications of Princeton, L.P.	C-TEC Cable System Services, Inc.
C-TEC Fiber Systems of New Jersey, Inc.	RCN Telecom Services of Southeast New York, Inc.
Fiberfone of Pennsylvania, Inc.	Fiberfone of New Jersey, Inc.
Fiberfone of Michigan, Inc.	TEC Air, Inc.
Starpower Communications, LLC	
ENET Holding, Inc.	
UNET Holding, Inc.	
Lancit Media Entertainment Ltd.	
JavaNet, Inc.	
Interport Communications, Corp.	

** As used herein, the term "Commonwealth Telephone Enterprises, Inc. Subsidiaries" refers to the following companies:

Commonwealth Telephone Company	Commonwealth Long Distance Company
Commonwealth Telecom Services, Inc.	SHRC, Inc.
TMH, Inc.	Keystone Telecom Company
C-TEC Cable Holdings Inc.	Mobile Plus, Inc.
Mobile Plus of Iowa, Inc.	Mobile Plus Services, Inc.
Mobilefone, Inc.	Mobile Plus Services of PA, Inc.
C-TEC Cellular Center County, Inc.	
CTE Services, Inc.	
epix Internet Services, Inc.	

CERTIFICATION OF APPLICANT

On behalf of RCN Telecom Services, Inc., and in accordance with Section 1.2001-1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-1.2003, I hereby certify that no party to this Application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. See 21 U.S.C. § 853a. I also hereby certify that the statements in the foregoing Application for Section 214 authority are true, complete, and correct to the best of my knowledge and are made in good faith.

RCN Telecom Services, Inc. has not agreed to accept nor shall it accept in the future any 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 on 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.

RCN TELECOM SERVICES, INC.

By: 

Name: Michael J. Mahoney

Title: President and Chief Operating Officer

Date: September 18, 1998

CERTIFICATION OF APPLICANT

On behalf of RCN Telecom Services of Arizona, Inc., and in accordance with Section 1.2001-1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-1.2003, I hereby certify that no party to this Application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. See 21 U.S.C. § 853a. I also hereby certify that the statements in the foregoing Application for Section 214 authority are true, complete, and correct to the best of my knowledge and are made in good faith.

RCN Telecom Services of Arizona, Inc. has not agreed to accept nor shall it accept in the future any 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 on 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.

RCN TELECOM SERVICES OF ARIZONA, INC.

By: *Michael J. Mahoney*

Name: Michael J. Mahoney

Title: President and Chief Operating Officer

Date: September 18, 1998

CERTIFICATION OF APPLICANT

On behalf of RCN Telecom Services of California, Inc., and in accordance with Section 1.2001-1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-1.2003, I hereby certify that no party to this Application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. See 21 U.S.C. § 853a. I also hereby certify that the statements in the foregoing Application for Section 214 authority are true, complete, and correct to the best of my knowledge and are made in good faith.

RCN Telecom Services of California, Inc. has not agreed to accept nor shall it accept in the future any 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 on 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

RCN TELECOM SERVICES OF CALIFORNIA, INC.

By: 

Name: Michael J. Mahoney

Title: President and Chief Operating Officer

Date: September 18, 1998

CERTIFICATION OF APPLICANT

On behalf of RCN Telecom Services of Nevada, Inc., and in accordance with Section 1.2001-1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-1.2003, I hereby certify that no party to this Application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. See 21 U.S.C. § 853a. I also hereby certify that the statements in the foregoing Application for Section 214 authority are true, complete, and correct to the best of my knowledge and are made in good faith.

RCN Telecom Services of Nevada, Inc. has not agreed to accept nor shall it accept in the future any 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 on 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.

RCN TELECOM SERVICES OF NEVADA, INC.

By: 

Name: Michael J. Mahoney

Title: President and Chief Operating Officer

Date: September 18, 1998