

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

*Exempt (7 exemptions)
(see p. 1)*

Description of Application: _____

ERD

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OCT 05 1998

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October 5, 1998

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

Attn: Diane J. Cornell, Chief

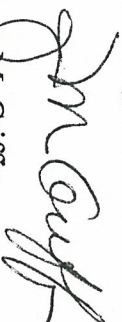
Re: Application of Singapore Telecom USA, Inc. for Authority Pursuant to Section 214 of the Communications Act of 1934, as Amended, to Operate as a Facilities-Based Carrier and as a Resale Carrier for the Provision of International Switched and Private Line Services to All Foreign Points Except Singapore, Australia, Thailand, Sri Lanka, Hong Kong, the United Kingdom, and the Philippines

Dear Sir or Madam:

Singapore Telecom USA, Inc., by its attorneys, hereby submits for filing an original and five (5) copies of its above-captioned application. Enclosed is a duplicate of this filing and a return envelope. Please date-stamp the duplicate upon receipt and return it in the envelope provided. Also enclosed is a check in the amount of \$780.00 for the filing fee.

Please do not hesitate to call me at the above-referenced number if you should have any questions regarding this matter.

Sincerely,



Joan M. Griffin
Senior Counsel

Enclosures

knowledge and belief, SingTel USA has no affiliation with any foreign carrier in any of the destination countries for which authority is requested, nor is SingTel USA affiliated with any U.S. facilities-based carrier. Thus, pursuant to Section 63.10(a)(1) of the Commission's Rules, SingTel USA should be classified as a nondominant carrier in its provision of international service to these locations. Furthermore, this Application is entitled to streamlined processing under Section 63.12 of the Commission's Rules.

Pursuant to Section 63.18 of the Commission's Rules, SingTel USA sets forth the following information in support of this Application:

- (a) The name, address, and telephone number of the Applicant is:
Singapore Telecom USA, Inc.
777 South Figueroa Street
27th Floor
Los Angeles, CA 90017
- (b) SingTel USA is a corporation organized under the laws of the State of California.
- (c) Correspondence concerning this Application should be sent to:

Jung Hui Tan
Joan M. Griffin
Singapore Telecom USA, Inc.
320 Post Road West, Suite 100
Westport, CT 06880
(203) 454-6814

with copies to:

Robert J. Aamoth
Joan M. Griffin
Kelley Drye & Warren, LLP
1200 19th Street, NW
Washington, DC 20036
(202) 955-9600

(d) SingTel USA has not previously received Section 214 authority from the Commission. An application for authority to provide facilities-based and resale services to Australia, Thailand, Sri Lanka, and the Philippines pursuant to Section 63.18(e)(6) is being filed concurrent with the submission of this Application.

(e) SingTel USA is applying for authority to operate as a facilities-based carrier pursuant to the terms and conditions of Section 63.18(e)(1) of the Commission's Rules and as a resale carrier pursuant to the terms and conditions of Section 63.18(e)(2) of the Commission's Rules. SingTel USA seeks authority to provide service to all points *except* Singapore, Australia, Thailand, Sri Lanka, and the Philippines.

(f) No response required.

(g) SingTel USA will use previously authorized facilities to provide its facilities-based services and thus this Application is categorically excluded from environmental assessment pursuant to Section 1.1306 of the Commission's Rules.

(h) (1) As evidenced by the certification provided in Attachment 1, SingTel USA is affiliated with foreign carriers in the countries listed in Attachment 1.

(2) SingTel USA is wholly-owned subsidiary of Singapore Telecommunications Limited ("SingTel"), a corporation organized under the laws of Singapore.² The principal business of SingTel is the provision of local, intercity, and international communications services in Singapore. Temasek Holdings (Private) Limited ("Temasek") holds an approximately 80 percent ownership interest in SingTel.³ Temasek is wholly-owned by the Minister for Finance (Incorporated) in Singapore; it is an investment holding company with diverse interests in a wide spectrum of industries including media, financial services, transportation, ship repair and engineering, properties, hotels, property management and consultancy, construction, leisure and recreation.⁴ No other stockholder holds 10 percent or more of the stock of SingTel. There are no interlocking directorates with any other U.S. carriers.

² The address of SingTel is 31 Exeter Road, Concentre, Singapore 239732.

³ The address of Temasek is 8 Shenton Way, #38-03, Temasek Tower, Singapore 068811.

⁴ To the best of SingTel USA's knowledge and belief, Temasek holds ownership interests in other telecommunications companies in Singapore which are competitors of SingTel and which hold certain licenses to provide mobile cellular telephone and radio paging services in Singapore. However, SingTel is uncertain as to whether Temasek holds ownership interests in telecommunications companies in other countries.

- (3) As evidenced by the certification provided in Attachment 1, SingTel USA has no affiliation with any U.S. carrier whose facilities-based services SingTel USA may resell.
- (4) No response required.
- (5), (6), (7), (8) Not applicable; SingTel USA is not affiliated or otherwise related to any foreign carrier on any of the routes SingTel USA proposes to serve in this Application.
- (i) As evidenced by the certification provided in Attachment 1, SingTel USA 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) As evidenced by the certification provided in Attachment 1, 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) SingTel USA requests streamlined processing pursuant to Section 63.12 of the Commission's Rules. This Application is eligible for streamlined processing because SingTel USA is not affiliated with foreign carriers on any route for which authority is sought nor is SingTel USA requesting authority to provide switched services over private lines to countries not previously authorized for this service.

For these reasons, SingTel USA requests that the Commission grant this Application.

Respectfully Submitted,

SINGAPORE TELECOM USA, INC.

By:


Robert J. Aamo

Joan M. Griffin

KELLEY DRYE & WARREN LLP

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Suite 500

Washington, D.C. 20036

(202) 955-9600

Its Attorneys

Date: 9/23/98

⁵ Pursuant to Section 1.743(b) of the Commission's Rules, this Application is signed by SingTel USA's counsel on its behalf as all SingTel USA representatives that are authorized to sign the Application are absent from the U.S.

ATTACHMENT 1

CERTIFICATE

The undersigned hereby certifies, on behalf of Singapore Telecom USA, Inc.

(“SingTel USA”) with respect to the foregoing application for authority to provide international service, that:

1. SingTel USA is not affiliated (as that term is defined in Section 63.18(h)(1) of the Commission’s Rules) with any U.S. carrier whose facilities-based service SingTel USA may resell.
2. SingTel USA is affiliated with foreign carriers (as those terms are defined in Section 63.18(h)(1) of the Commission’s Rules) in the countries listed in Annex A to this Certificate.
3. SingTel USA 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.
4. No party to this application is subject to a denial for Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853(a).

By:


Robert J. Aamoith¹

Joan M. Griffin

KELLEY DRYE & WARREN LLP

1200-19th Street, N.W., Suite 500

Washington, D.C. 20036

(202) 955-9600

Its Attorneys

Date:

9/23/98

¹ Pursuant to Section 1.743(b) of the Commission’s Rules, this Application is signed by SingTel USA’s counsel on its behalf as all SingTel USA representatives that are authorized to sign the Application are absent from the U.S.

ANNEX A

COUNTRIES IN WHICH SINGAPORE TELECOM USA
HAS A FOREIGN AFFILIATE

Singapore
Thailand
Sri Lanka
Australia
Philippines
Hong Kong
The United Kingdom