

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

ITC-214-19981009-00694

- 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: _____

FCC/MELLOW OCT 09 1998

ARTER & HADDEN LLP

ATTORNEYS AT LAW

founded 1843

COPY

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October 9, 1998

VIA BERRY BEST SERVICES

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

Re: Phillips County Communications, Inc.

Dear Sir or Madam:

Enclosed herewith, pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, and Section 63.01 of the Commission's Rules, 47 C.F.R. § 63.01, are an original and five copies of the application of Phillips County Communications, Inc. for authority to resell services of other common carriers to provide telephone services from the contiguous United States to international points. No officer, director, or stockholder of Phillips County Communications, Inc. is an agent or representative of a foreign telecommunications entity.

Attached is the statutory processing fee in the form of a personal check payable to the Federal Communications Commission in the amount of \$780.00 and F.C.C. Form 159.

Acknowledgment and date of receipt of this filing is requested. A duplicate copy of this letter is provided for this purpose.

ARTER & HADDEN
LLP

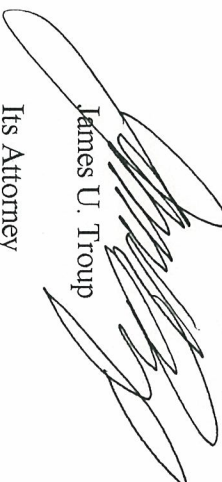
Federal Communications Commission
October 8, 1998
Page 2

All correspondence and inquiries in connection with this filing should be
addressed to:

James U. Troup
Arter & Hadden LLP
1801 K Street, N.W.
Suite 400K
Washington, D.C. 20006
(202) 775-7960

Respectfully submitted,

PHILLIPS COUNTY
COMMUNICATIONS, INC.



James U. Troup
Its Attorney

Enclosures

169006

(a) The name and address of the applicant is:

Phillips County Communications, Inc.
P.O. Box 387
240 South Interocean
Holyoke, CO 80734

(b) Phillips County Communications, Inc. is incorporated under the laws of the State of Colorado.

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

Vincent Kropp, Manager
Phillips County Communications, Inc.
P.O. Box 387
240 South Interocean
Holyoke, CO 80734
(970) 854-2201
(970) 854-2668 (facsimile)

With a copy to applicant's counsel:

James U. Troup
Arter & Hadden LLP
1801 K Street, NW
Suite 400K
Washington, DC 20006
(202) 775-7960
(202) 857-0172 (facsimile)

(d) Applicant is not presently subject to Section 214 of the Act, but will become subject to Section 214 as a result of its proposed international service resale operations.

- (e) The applicant is requesting authority to resell the international services of authorized U.S. common carriers for the provision of international basic switched, private line, data, television and business services to all international points. Thus, it is requesting authority to operate as a resale carrier pursuant to the terms and conditions of Section 63.18(e)(2).
At this time, the applicant is not seeking authority to operate as a facilities-based carrier.

Certifications

- (1) PCCI hereby certifies that it is not owned by or affiliated with a foreign carrier for purposes of Section 63.18(h) of the Commission's Rules.³
- (2) In support of this certification PCCI provides the following stockholder information:
- PCCI is a wholly owned subsidiary of Phillips County Telephone Company, a U.S. company.
 - No shareholder has ten percent or greater ownership in Phillips County Telephone Company.
 - There are no interlocking directorates.
- (3) PCCI certifies that it (1) shall maintain separate books of accounts from Phillips County Telephone Company; (2) shall not jointly own transmission or switching facilities with Phillips County Telephone Company; and (3) shall take any tariffed services from Phillips County Telephone Company pursuant to the terms and conditions of Phillips County Telephone Company's generally applicable tariff. In addition, PCCI will be treated as a nonregulated affiliate for purposes of local exchange carrier accounting under the Commission's joint cost and affiliate transactions rules as set forth in Parts 32 and 64 of the Commission's rules.

³ 47 C.F.R. § 63.18(h).

- (4) PCCI hereby certifies that it is not affiliated with the U.S. carriers whose facilities-based services it proposes to resell.
- (5) PCCI hereby certifies that no party to the application is subject to a denial of the Federal benefits requested herein pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.⁴
- (6) PCCI hereby certifies that it 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 it may serve under the authority granted under this part and will not enter into such agreements in the future.

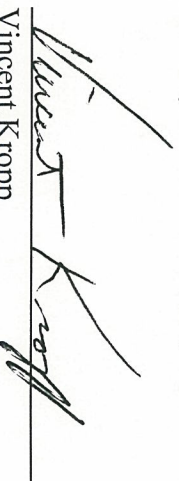
CONCLUSION

In light of the foregoing, PCCI respectfully submits that the public interest, convenience and necessity would be served by a grant of the Section 214 application sought, and therefore requests that such authorization be issued to PCCI for purposes of reselling IMTS between points in the United States and various international points.

Respectfully submitted,

Phillips County Communications, Inc.

By:



Vincent Kropp
Manager

Phillips County Communications, Inc.

Dated: October 6, 1998

⁴ 21 U.S.C. § 853 (a).

Arter & Hadden LLP
1801 K Street, NW
Suite 400K
Washington, DC 20006

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

REORDER FT 808 • U.S. PATENT NO. 5392920;5575508;564113

308266

2874 Federal Communications Commission

INVOICE DATE 10/08/98
INVOICE NUMBER 780.00
Section 214 Filing Fee - CESheppard

AMOUNT
780.00

TOTAL \$*****780.00

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THIS CHECK IS VOID WITHOUT A BLUE & GREEN BACKGROUND AND AN ARTIFICIAL WATERMARK CERTIFICATION SEAL ON THE BACK - HOLD AT ANGLE TO VIEW SEAL

Arter & Hadden LLP
1801 K Street, NW
Suite 400K
Washington, DC 20006

Bank One
Cleveland, OH

308266

CHECK DATE
10/08/98

PAY *****
Seven Hundred Eighty & 00/100 DOLLARS
\$*****780.00

TO THE ORDER OF

Federal Communications Commission

Arter & Hadden LLP

VOID AFTER ONE YEAR FROM ISSUE DATE

SIGNATURE HAS A COLORED BACKGROUND • BORDER CONTAINS MICROPRINTING

⑆00000308266⑆

⑆044115443⑆

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