

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:

*Letter to Singapore -
request to be registered as dominant -*

PB1

READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE

APPROVED BY OMB 3060-0589

PAGE NO. 1 OF 1

SPECIAL USE
FCC USE ONLY
NOV 18 1998

(1) LOCKBOX # 358.115

SECTION A - PAYER INFORMATION

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card)
Kelley Drye & Warren LLP

(3) TOTAL AMOUNT PAID (dollars and cents)
\$ 780.00

(4) STREET ADDRESS LINE NO. 1
1200 19th Street, NW

(5) STREET ADDRESS LINE NO. 2
Suite 500

ITC-214-19981118-00808

(6) CITY
Washington, DC

(7) STATE

(8) DAYTIME TELEPHONE NUMBER (include area code)

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

(9) ZIP CODE
20036

(202) 955-9600

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)

Singapore Telecom USA, Inc.

(12) STREET ADDRESS LINE NO. 1

777 South Figueroa Street

(13) STREET ADDRESS LINE NO. 2

27th Floor

(14) CITY

Los Angeles

(15) STATE

California

(16) ZIP CODE

90017

(17) DAYTIME TELEPHONE NUMBER (include area code)

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)

(21A) QUANTITY

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

FCC USE ONLY

(23A) FCC CODE 1

C

U

Jr

\$ 780.00

(24A) FCC CODE 2

FCC USE ONLY

(19B) FCC CALL SIGN/OTHER ID

(20B) PAYMENT TYPE CODE (PTC)

(21B) QUANTITY

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

FCC USE ONLY

(23B) FCC CODE 1

(24B) FCC CODE 2

FCC USE ONLY

(19C) FCC CALL SIGN/OTHER ID

(20C) PAYMENT TYPE CODE (PTC)

(21C) QUANTITY

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

FCC USE ONLY

(23C) FCC CODE 1

(24C) FCC CODE 2

FCC USE ONLY

(19D) FCC CALL SIGN/OTHER ID

(20D) PAYMENT TYPE CODE (PTC)

(21D) QUANTITY

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

FCC USE ONLY

(23D) FCC CODE 1

(24D) FCC CODE 2

FCC USE ONLY

SECTION D - TAXPAYER INFORMATION (REQUIRED)

(28) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-1 IS DIFFERENT FROM PAYER NAME IN A-2)

PAYER TIN

0 1 3 5 3 3 5 1 0 7

APPLICANT TIN

0

SECTION E - CERTIFICATION

(27) CERTIFICATION STATEMENT
I, Robert J. Amoth

(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

MASTERCARD/VISA ACCOUNT NUMBER:

EXPIRATION DATE:

MASTERCARD

Grid for account number: 16 empty boxes

Grid for expiration date: MONTH [] [] YEAR [] []

VISA

I hereby authorize the FCC to charge my VISA or MASTERCARD for the service(s)/authorization(s) herein described.

AUTHORIZED SIGNATURE

DATE

SEE PUBLIC BURDEN ESTIMATE ON REVERSE

FCC FORM 159 JULY 1997 (REVISED)

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL ASSOCIATIONS

1200 19TH STREET, N.W.

SUITE 500

WASHINGTON, D. C. 20036

FACSIMILE

(202) 955-9792

NEW YORK, N.Y.

LOS ANGELES, CA.

MIAMI, FL.

CHICAGO, IL.

STAMFORD, CT.

PARISIPANY, N.J.

BRUSSELS, BELGIUM

HONG KONG

AFFILIATED OFFICES
NEW DELHI, INDIA
TOKYO, JAPAN

(202) 955-9600

WRITER'S DIRECT LINE
(202) 955-9786

WRITER'S E-MAIL
jgriffin@kelleydrye.com

November 18, 1998

Via Hand Delivery

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
Resale Carrier for the Provision of International Switched and Private Line
Services Between the U.S. and Singapore

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,


Robert J. Aamoth

Enclosures

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

In the Matter of

SINGAPORE TELECOM USA, INC.

Application for Authority Under
Section 214 of the Communications
Act of 1934, as Amended, to Operate
as a Resale Carrier for the Provision of
International Switched and Private
Line Services Between the U.S. and
Singapore

Docket No. TC-214-1998118-00808

APPLICATION

Singapore Telecom USA, Inc. ("SingTel USA" or "Applicant"), by its attorneys and pursuant to Section 214 of the Communications Act of 1934, as amended ("the Act"), 47 U.S.C. § 214, hereby requests authority, pursuant to Section 63.18(e)(6) of the Commission's Rules, 47 C.F.R. § 63.18 (1998), 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 between the U.S. and Singapore.¹

SingTel USA is a wholly-owned subsidiary of Singapore Telecommunications Limited ("SingTel"), the primary provider of local, intercity, and international communications services in Singapore. Since Singapore is a Member of the World Trade Organization ("WTO"), SingTel USA is entitled to a presumption in favor of entry pursuant to the rules and policies adopted by

¹ SingTel USA does not seek authority in this Application to provide switched services over private lines.

the Commission in its *Foreign Participation Order*.² Thus, the Commission's effective competitive opportunities test does not apply to this Application. With respect to regulatory treatment, SingTel USA will accept dominant carrier status. Finally, SingTel USA requests that the Commission process this Application in accordance with its streamlined processing procedures. Since Singapore is a WTO Member and SingTel USA will accept dominant carrier treatment, 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
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

² *Rules and Policies on Foreign Participation in the U.S. Telecommunications Market*, IB Docket No. 97-142, FCC 97-398, rel. Nov. 26, 1997 (“*Foreign Participation Order*”).

(d) SingTel USA has not previously received Section 214 authority from the Commission. However, two applications of SingTel USA for Section 214 authority to serve other locations are currently pending in File Nos. ITC-214-19981005-00680 and ITC-214-19981005-00681.

(e) SingTel USA seeks authority, pursuant to Section 63.18(e)(6) of the Commission's Rules, 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 Singapore. SingTel USA does not seek authority to provide switched services over private lines in this Application.

(f) No response required.

(g) Not applicable; SingTel does not request facilities-based authority in this Application.

(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 a wholly-owned subsidiary of Singapore Telecommunications Limited ("SingTel"), a corporation organized under the laws of Singapore.³ 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.⁴ 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.⁵ No other stockholder holds 10 percent or more of the stock of SingTel. There are no interlocking directorates with other U.S. common carriers.

³ The address of SingTel is 31 Exeter Road, Comcentre, Singapore 239732.

⁴ The address of Temasek is 8 Shenton Way, #38-03, Temasek Tower, Singapore 068811.

⁵ 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 USA 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) Not applicable; SingTel USA is not seeking facilities-based authority in this Application.
- (6) SingTel USA is affiliated within the meaning of Section 63.18(h)(1)(i)(B) with SingTel, a foreign carrier in Singapore. Singapore is a Member of the WTO.
- (7) SingTel USA will file quarterly traffic reports as required by Section 43.61(c) of the Commission's Rules.
- (8) Not applicable; SingTel USA will accept dominant carrier treatment on the route.
- (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 under Section 63.12(c)(1)(iii) because Singapore is a Member of the WTO and SingTel USA will accept dominant carrier treatment on the route.

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

Respectfully Submitted,

SINGAPORE TELECOM USA, INC.

By: 

Robert J. Annoth⁶

Joan M. Griffin

KELLEY DRYE & WARREN LLP

1200 19th Street, N.W.

Suite 500

Washington, D.C. 20036

(202) 955-9600

Its Attorneys

Date: 11/18/98

⁶ 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 of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853(a).

By: _____


Robert J. Annoth¹

Joan M. Griffin

KELLEY DRYE & WARREN LLP

1200 19th Street, N.W.

Suite 500

Washington, D.C. 20036

(202) 955-9600

Its Attorneys

Date: 11/18/98

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, INC.
HAS A FOREIGN AFFILIATE

Singapore
Thailand
Sri Lanka
Philippines
Australia
Hong Kong
The United Kingdom