

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: \_\_\_\_\_

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1006 Hamilton Avenue  
Milpitas, CA 95035  
408-719-8883 (T)  
408-719-8884 (F)

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**Paragon Global Communications LLC**


**BY OVERNIGHT DELIVERY**

November 20, 1998

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

Re: Paragon Global Communications LLC  
Application for Global Section 214 Authority

Dear Sir/Madam:

  
Pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, and Section 63.18 of the Rules of the Federal Communications Commission ("FCC"), 47 C.F.R. § 63.18, Paragon Global Communications LLC ("Paragon") hereby submits an original and five copies of its application for global authority to provide international facilities-based and resale services. Also enclosed are a completed FCC Form 159 and a check in the amount of the required filing fee of \$780.

Acknowledgment of the date of receipt is requested, and an additional copy of the application is provided for this purpose. Please direct any correspondence or inquiries regarding this matter to the undersigned. Thank you for your assistance in this matter.

Sincerely,

*Lou Muscarella*

Louis J. Muscarella  
Chief Executive Manager



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

Louis J. Muscarella, Chief Executive Manager  
Paragon Global Communications LLC  
1006 Hamilton Avenue  
Milpitas, CA 95035  
(408) 719-8883 (T)  
(408) 719-8884 (F)

- (d) Paragon has not received authority previously under Section 214 of the Communications Act.

- (e) Paragon requests global facilities-based and resale Section 214 authority pursuant to the terms and conditions of Section 63.18(e)(1) and (e)(2) of the Commission's rules.

- (f) At this time, Paragon seeks no other authorization available under Section 63.18(e).

- (g) Not applicable.

- (h) Paragon certifies that it is not affiliated with any foreign or U.S. facilities-based carrier.

In support of this certification, the following are the names, addresses, citizenship, and principal businesses of the shareholders who control ten percent or more of Paragon:

<u>Name &amp; Address</u>	<u>Citizenship</u>	<u>Equity</u>	<u>Principal Business</u>
Louis J. Muscarella 1006 Hamilton Avenue Milpitas, CA 95035	U.S.	47.5%	Telecommunications
John C. Do 1006 Hamilton Avenue Milpitas, CA 95035	U.S.	47.5%	Telecommunications

- (i) Paragon certifies that it has not agreed and will not agree to accept any direct or indirect special concessions from a foreign carrier or administration with regards to traffic or revenue flows between the United States and any foreign country which Paragon is authorized to serve.

- (j) Paragon certifies that no party to this application has been denied federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1998.

Based on the foregoing, Paragon respectfully submits that the public interest, convenience, and necessity would be served by the grant of this application, which will promote competition in the international services market. Competition will benefit U.S. consumers by increasing service options and lowering prices.

Respectfully submitted,

Paragon Global Communications LLC

By:

Lon Muscarella / 1998

Louis J. Muscarella  
Chief Executive Manager

Date: November 20, 1998

OFFICIAL CHECK

CTIBANK

CTIBANK FEDERAL SAVINGS BANK

1220

16-2988

FEDERAL COMMUNICATION COMMISSION

DRAWER: CTIBANK FEDERAL SAVINGS BANK

MEMORANDUM

LOUIS MUSCARELLA/PAYSON GLEN CON

AUTHORIZED SIGNATURE

BY *[Signature]* AUTHORIZED SIGNATURE

By Integrated Payment Systems Inc. Englewood, Colorado

via through Citibank Intl. Los Angeles, CA for Citibank (NY State) Buffalo, NY

⑆ 1220 29587⑆ 681⑆ 052581 385858121

VARIABLE TONE BACKGROUND AREA OF THIS DOCUMENT CHANGES COLOR GRADUALLY AND SMOOTHLY FROM DARKER TONES AT BOTH TOP AND BOTTOM TO THE LIGHTEST TONE IN THE MIDDLE.

2180 15<sup>th</sup> St. #2  
San Francisco, CA 94114  
415-437-1969 (T)

.....  
**LEGACY Telecommunications, Inc.**


**BY OVERNIGHT DELIVERY**

December 22, 1998

Ms. Fran Eisenstein  
Federal Communications Commission  
International Bureau - Telecommunications  
2000 M St., Room 843  
Washington, D.C. 20554

Re: Paragon Global Communications LLC  
Application for Global Section 214 Authority

Dear Ms. Eisenstein:



Paragon Global Communications LLC ("Paragon") and LEGACY Telecommunications, Inc. ("LEGACY") hereby submit an original and five copies of an amended application for global Section 214 authority to provide international facilities-based and resale services. The original application was filed initially on November 23, 1998, and was placed on Public Notice dated December 4, 1998. Paragon and LEGACY respectfully request that the original application for global Section 214 authority be amended to substitute LEGACY in place of Paragon as the applicant.

Acknowledgment of the date of receipt is requested, and an additional copy of the amended application is provided for this purpose. Please direct any correspondence or inquiries regarding this matter to the undersigned. Thank you for your assistance in this matter.

Sincerely,

Paragon Global Communications LLC      LEGACY Telecommunications, Inc.

By: *Lou Muscarella*  
Louis J. Muscarella  
Chief Executive Manager

By: *Phuong N. Pham*  
Phuong N. Pham  
Chief Executive Officer





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

Phuong N. Pham  
LEGACY Telecommunications, Inc.  
2180 15<sup>th</sup> St. #2  
San Francisco, CA 94114  
(415) 437-1969 (T)

(d) LEGACY has not received authority previously under Section 214 of the Communications Act.

(e) LEGACY requests global facilities-based and resale Section 214 authority pursuant to the terms and conditions of Section 63.18(e)(1) and (e)(2) of the Commission's rules.

(f) At this time, LEGACY seeks no other authorization available under Section 63.18(e).

(g) Not applicable.

(h) LEGACY certifies that it is not affiliated with any foreign or U.S. facilities-based carrier.

In support of this certification, the following are the names, addresses, citizenship, and principal businesses of the shareholders who control ten percent or more of LEGACY:

<u>Name &amp; Address</u>	<u>Citizenship</u>	<u>Equity</u>	<u>Principal Business</u>
Phuong N. Pham 2180 15 <sup>th</sup> St. #2 San Francisco, CA 94114	U.S.	72%	Telecommunications
Maria Salvacion Colmenares 4372 Stone Canyon Dr. San Jose, CA 95136	U.S.	14%	Telecommunications
Robert Grabau 12840 Butterfly Dr. Nevada City, CA 95959	U.S.	14%	Telecommunications

(i) LEGACY certifies that it has not agreed and will not agree to accept any direct or indirect special concessions from a foreign carrier or administration with regards to traffic or revenue flows between the United States and any foreign country which LEGACY is authorized to serve.

(j) LEGACY certifies that no party to this application has been denied federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1998.

Based on the foregoing, LEGACY respectfully submits that the public interest, convenience, and necessity would be served by the grant of this application, which will promote competition in the international services market. Competition will benefit U.S. consumers by increasing service options and lowering prices.

Respectfully submitted,

LEGACY Telecommunications, Inc.

By:



Phuong N. Pham  
Chief Executive Officer

Date: December 22, 1998