

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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READ INSTRUCTIONS CAREFULLY  
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION  
**REMITTANCE ADVICE**

APPROVED BY OMB 3060-0589

FOR DEPOSIT ON OF 1 JAN 11 1999

SPECIAL USE  
FCC USE ONLY



(1) LOCKBOX # 358115

SECTION A - PAYER INFORMATION

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card) **COMLINK, Inc.** (3) TOTAL AMOUNT PAID (dollars and cents) **780.00**

(4) STREET ADDRESS LINE NO. 1  
**100 Eyster Blvd.**

(5) STREET ADDRESS LINE NO. 2

*ITC-214-19990111-00009*

(6) CITY **Rockledge** (7) STATE **FL** (8) ZIP CODE **32955**

(9) DAYTIME TELEPHONE NUMBER (include area code) **407-636-7400** (10) COUNTRY CODE (if not in U.S.A.)

**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)

(12) STREET ADDRESS LINE NO. 1

(13) STREET ADDRESS LINE NO. 2

(14) CITY (15) STATE (16) ZIP CODE

(17) DAYTIME TELEPHONE NUMBER (include area code) (18) COUNTRY CODE (if not in U.S.A.)

**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 (22A) FEE DUE FOR (PTC) IN BLOCK 20A (22A) FEE DUE FOR (PTC) IN BLOCK 20A (22A) FEE DUE FOR (PTC) IN BLOCK 20A  
C U T 1 \$ 780.00

(23A) FCC CODE 1 (24A) FCC CODE 2

(19B) FCC CALL SIGN/OTHER ID (20B) PAYMENT TYPE CODE (PTC) (21B) QUANTITY (22B) FEE DUE FOR (PTC) IN BLOCK 20B (22B) FEE DUE FOR (PTC) IN BLOCK 20B (22B) FEE DUE FOR (PTC) IN BLOCK 20B (22B) FEE DUE FOR (PTC) IN BLOCK 20B  
\$ \$ \$ \$ \$ \$

(23B) FCC CODE 1 (24B) FCC CODE 2

(19C) FCC CALL SIGN/OTHER ID (20C) PAYMENT TYPE CODE (PTC) (21C) QUANTITY (22C) FEE DUE FOR (PTC) IN BLOCK 20C (22C) FEE DUE FOR (PTC) IN BLOCK 20C (22C) FEE DUE FOR (PTC) IN BLOCK 20C (22C) FEE DUE FOR (PTC) IN BLOCK 20C  
\$ \$ \$ \$ \$ \$

(23C) FCC CODE 1 (24C) FCC CODE 2

(19D) FCC CALL SIGN/OTHER ID (20D) PAYMENT TYPE CODE (PTC) (21D) QUANTITY (22D) FEE DUE FOR (PTC) IN BLOCK 20D (22D) FEE DUE FOR (PTC) IN BLOCK 20D (22D) FEE DUE FOR (PTC) IN BLOCK 20D (22D) FEE DUE FOR (PTC) IN BLOCK 20D  
\$ \$ \$ \$ \$ \$

(23D) FCC CODE 1 (24D) FCC CODE 2

**SECTION D - TAXPAYER INFORMATION (REQUIRED)**

(25) PAYER TIN **0593038709** (26) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-11 IS DIFFERENT FROM PAYER NAME IN A-2  
APPLICANT TIN **0**

SECTION E - CERTIFICATION

(27) CERTIFICATION STATEMENT I, \_\_\_\_\_, (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

(28) MASTERCARD/VISA ACCOUNT NUMBER: \_\_\_\_\_ EXPIRATION DATE: \_\_\_\_\_

MASTERCARD  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)

**IRWIN, CAMPBELL & TANNENWALD, P.C.**

ATTORNEYS AT LAW  
1730 RHODE ISLAND AVENUE, N.W.  
SUITE 200  
WASHINGTON, D.C. 20036  
(202) 728-0400  
FAX (202) 728-0354

MICHELLE A. McCLURE  
(202) 728-0401 Ext. 115

January 11, 1999

VIA MESSENGER

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

Re: Application for Authority Under Section 214 of the Communications Act of 1934,  
as amended, to Provide Telecommunications Services Between the United States  
and International Points

Dear Sir or Madam:

Enclosed for filing are the original and five copies of the above referenced application of COMLINK, Inc. Also enclosed is an FCC Form 159 and a check in the amount of \$780.00 to cover the appropriate filing fee. This application is filed under streamlined filing requirements for international resellers.

Please acknowledge receipt of this transmittal and filing fee by returning a date-stamped copy of the enclosed cover letter duplicate in the return envelope provided for that purpose.

Thank you for your attention in this matter. Questions regarding this filing should be directed to the undersigned.

Sincerely,



Michelle A. McClure

Enclosure

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

In the Matter of )  
 )  
 )  
COMLINK, Inc. ) ITC 99 -  
 )

Application for Authority Under Section 214 )  
of the Communications Act of 1934, as )  
amended, to Provide Telecommunications )  
Services Between the United States and )  
International Points )  
 )

To: Chief, International Bureau

**APPLICATION FOR SECTION 214 AUTHORITY**

COMLINK, Inc. ("COMLINK"), hereby respectfully requests authority pursuant to Section 214 of the Communications Act of 1934, as amended ("Act"), 47 U.S.C. § 214, and Section 63.18 of the Commission's Rules, 47 C.F.R. § 63.18, to provide global international resold basic switched services for the carriage of customer traffic, including voice, facsimile, video, Internet and data service, between the United States, Hawaii, Puerto Rico, the U.S. Virgin Islands and international points. The instant application meets the requirements of 47 C.F.R. § 63.12 and thus is eligible for streamlined processing.

**I. INTRODUCTION**

COMLINK, headquartered in Rockledge, Florida, proposes to enter the business of providing international switched communications services (including voice, Internet, facsimile and data) through the resale of existing international common carrier services. Based on its review of the market for international services among groups to which it markets its service, COMLINK has

determined that significant demand exists for additional international telecommunications service offerings to the international points it proposes to serve to justify its entering into that business.

COMLINK believes that there is substantial potential for continued growth in the international switched voice and data markets and that this expansion will be accelerated by additional competition due to new entrants. Moreover, the Commission has determined that increased competition in the international market is in the public interest and, as a result, has routinely authorized new entrants upon making such findings.<sup>1</sup> More importantly, the Commission has also found that increased competition through the resale of international switched voice service is also in the public interest.<sup>2</sup>

International services to overseas points are currently offered by a large number of other facilities-based and resale carriers. Existing international facilities and services are inadequate insofar as additional entry of international resale carriers will further stimulate demand and encourage more efficient service at lower cost. Absent a grant of the instant application, international telecommunications users will not be able to benefit from the increased service option and competitive prices which will be offered by COMLINK.

COMLINK proposes to obtain the requisite capacity from underlying carriers to provide quality international telecommunications services between the United States and international points. COMLINK would compete with other carriers that already provide international telecommunications

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<sup>1</sup>See, e.g., International Telecom. Inc., 6 FCC Rcd 1964 (1991) (citing Teltec Savings Communications Co., File No. ITC-86-062, Mimeo No. 3548 (released Apr. 4, 1986) and cases cited therein.)

<sup>2</sup>See, e.g., Argo Communications International, Inc., 1 FCC Rcd 578 (1986) and TDX Systems, Inc., File No. ITC-86-108, Mimeo No. 6609 (released Sept. 2, 1986).

services by reselling the service over existing international facilities. COMLINK would compete with other carriers that already provide similar international telecommunications services to overseas points.

COMLINK believes that the added competition its entry would bring to the market will benefit the consumers of telecommunications services between the United States and other international points. These benefits include competitive pricing and the increased availability of a variety of service options. The grant of this authorization will therefore further the public interest.

## **II. SECTION 63.18 SHOWING**

In support of COMLINK's request for authorization, the following information is submitted pursuant to Section 63.18 of the Commission's Rules:

- (a) Name and address and telephone number of applicant:  
  
COMLINK, Inc.  
100 Eyster Blvd.  
Rockledge, FL 32955
  
- (b) COMLINK is a corporation organized and existing under the laws of the state of Florida.
  
- (c) Correspondence concerning this application should be directed to:

Lloyd D. Brownhill  
COMLINK, Inc.  
100 Eyster Blvd.  
Rockledge, FL 32955

with a copy to:

Michelle A. McClure, Esq.  
Irwin, Campbell & Tannenwald, P.C.  
1730 Rhode Island Ave., N.W., Suite 200

Washington, DC 20036  
Tel: (202) 728-0400

- (d) COMLINK has no existing facilities nor has it previously received authorizations under Section 214 to provide service between these or any other points. Pursuant to this application, COMLINK will operate as a non-dominant international resale common carrier subject to Section 214 of the Act.
- (e) COMLINK requests global resale Section 214 authority pursuant to the terms and conditions of Section 63.18(e)(2) of the Commission's rules.
- (f) At this time, COMLINK seeks no other authorization available under Section 63.18(e).
- (g) Not applicable.
- (h) COMLINK certifies that it is not affiliated with any foreign or U.S. facilities-based carrier as that term is defined in Section 63.18(h)(1)(i) of the Commission's rules. In support of this certification, COMLINK has provided as Exhibit A the name, address, citizenship and principal business of its 10 percent or greater shareholders or other equity holders and has identified any interlocking directorates. COMLINK further certifies that it has no affiliation with the underlying carrier(s) whose services it intends to resell (either directly or indirectly through the resale of another reseller's service) in the instant application.
- (i) COMLINK certifies that it has not agreed and will not agree in the future 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 countries that COMLINK is authorized to serve.

- (j) COMLINK certifies that no party to this application has been denied federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

### III. CONCLUSION

COMLINK has demonstrated that it is qualified to provide the services for which it requests authority and eligible for streamlined processing. Moreover, COMLINK submits that the public interest, convenience and necessity would be furthered by a grant of its application. Thus, COMLINK respectfully requests that it be authorized to provide resold switched communications services, including voice, Internet, facsimile and data, between the United States, Hawaii, Puerto Rico and the U.S. Virgin Islands and various international points.

Respectfully submitted,

COMLINK, INC.

By:   
Lloyd D. Brownhill, President

Dated: 1/7/99



Exhibit A

**10 Percent or Greater Shareholders or Other Equity Holders**

<u>Name</u>	<u>Address</u>	<u>Citizenship</u>	<u>Principal Business</u>
Lloyd D. Brownhill	4370 Canard Rd. Melbourne, FL 32955	U.S.	Telecommunications

**Officers and Directors of COMLINK**

Lloyd D. Brownhill, President, Secretary and Treasurer

**Interlocking Directorates**

None

F.C.C.

Check Number: 13013 **013013**  
Check Date: Jan 8, 1999  
Check Amount: \$780.00

Item to be Paid - Description  
Application for Section 214

Discount Taken      Amount Paid  
                                 780.00

ORIGINAL DOCUMENT IS PRINTED ON CHEMICAL REACTIVE PAPER & HAS A MICROPRINTED BORDER

**COMLINK, INC.**  
P.O. BOX 561287  
ROCKLEDGE, FL 32956-1287  
(407)636-7400



FIRST UNION NATIONAL BANK  
OF FLORIDA  
W. MELBOURNE, FLORIDA 32904  
63-751/631

**013013**  
NUMBER

PAY: Seven Hundred Eighty and 0/100 Dollars

DATE

AMOUNT

Jan 8, 1999      \*\*\*\*\*\$780.00

TO THE      F.C.C.  
ORDER  
OF

THE REVERSE SIDE OF THIS DOCUMENT INCLUDES AN ARTIFICIAL WATERMARK - HOLD AT AN ANGLE TO VIEW

013013 0631075131 209000047430