

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: _____

HARBOR CONSULTING GROUP INC.

REGULATORY CONSULTANTS

4312 92ND AVENUE NORTHWEST
GIG HARBOR WASHINGTON 98335

TELEPHONE: 253.265.3910
FACSIMILE: 253.265.3912
E-MAIL: hcgfi@nwflink.com

FCC/MELTON JAN 7 7 1999

Mark Nyhus

VIA OVERNIGHT DELIVERY

8 January 1999

Mr. William F. Caton, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

RE: ComPlus, L.L.C. - Application for Section 214 Authority

Dear Mr. Caton:

Enclosed are an original and five (5) copies of ComPlus, L.L.C.'s Application for Section 214 Authority, filed pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214 and § 63.01 *et seq.*, of the Rules of the Federal Communications Commission.

A check made payable to the Federal Communications Commission in the amount of \$780.00 to cover the filing fee, an FCC Remittance Advice Form 159 and the original of this letter have been delivered via overnight delivery to the Federal Communications Commission c/o the Mellon Bank, Three Mellon Bank Center, 525 William Penn Way, 27th Floor, Room 153-2713, Pittsburgh, Pennsylvania 15259-0001, Attention: Wholesale Lockbox Shift Supervisor.

Please acknowledge receipt of this filing by file-stamping the additional copy of the first page of the application and returning it in the self addressed stamped envelope provided for the purpose. Questions concerning this application may be directed to me.

Sincerely,

Harbor Consulting Group Inc.


Mark Nyhus
Director - Regulatory Affairs

Enclosures

cc: Chief, International Facilities Division
Ms. Christina Fincher

Pursuant to § 63.18 of the Commission's rules, 47 C.F.R. § 63.18, Applicant submits the following information in support of its Application for authority:

1. § 63.18(a). The name, address, telephone number and facsimile number of the

Applicant are:

ComPlus, L.L.C.
2100 North Highway 360, No. 1904
Grand Prairie, Texas 75050

Telephone: 972.336.0808
Facsimile: 972.602.7477

2. § 63.18(b). The Applicant was incorporated under the laws of the State of Texas on July 20, 1998.

3. § 63.18(c). Correspondence concerning this Application should be addressed to:

Ms. Kristin Larson Doyle
c/o Harbor Consulting Group Inc.
4312 92nd Avenue Northwest
Gig Harbor, Washington 98335

Telephone: 253.265.3910
Facsimile: 253.265.3912

and

Ms. Christina Fincher
2100 North Highway 360, No. 1904
Grand Prairie, Texas 75050

Telephone: 972.336.0808
Facsimile: 972.602.7477

4. § 63.18(d). The Applicant has not previously received authority under Section 214 of the Act.

5. § 63.18(e)(1) through (5). Applicant requests authority to operate as a facilities-based international carrier, pursuant to Section 214 of the Act and the Commission's Foreign Carrier Entry Order¹. The Applicant would acquire and operate international facilities for the provision of international switched service to those countries found by the Commission to provide equivalent resale opportunities. It will operate those facilities in accordance with the terms and conditions of §§ 63.18(e)(1) and 63.21 of the rules, as well as any other applicable rules and regulations of the Commission.
- Applicant further requests authority pursuant to Section 214 of the Act to resell the international switched and private line services of authorized U.S. common carriers for the provision of international switched and basic private line services to all permissible international points deemed by the Commission to afford equivalent resale opportunities to U.S. carriers.
6. § 63.18(f). This Application is subject to the Commission's streamlined processing rules. The Applicant is a non-dominant carrier which qualifies for non-dominant regulation pursuant to § 63.12, 47 C.F.R. § 63.12, as it is not affiliated with a foreign carrier within the meaning of § 63.18(h)(1)(i) in a destination market for its facilities-based or resold services as set forth below.

7. § 63.18(g). Not applicable.

¹ In the Matter of Market Entry and Regulation of Foreign-Affiliated Entities ("Report and Order"), IB Docket No. 95-22, FCC 95-475, 11 FCC Rcd. 3873 (1995).

8. § 63.18(h)(1) and (3). By its executed certification attached hereto, Applicant hereby certifies that it has no affiliation with foreign carriers, as defined in §§ 63.18(h)(1)(i) and (ii) of the Commission's Rules.

9. § 63.18(h)(2). Applicant's ownership is as follows:

Name: Ladia

Address: 28 Cedar Street
Duxbury, Massachusetts 02332

Ownership: 33.33 percent

Name: Mr. Doug Copley

Address: 2100 North Highway 360, No. 1904
Grand Prairie, Texas 75050

Ownership: 33.33 percent

Name: Mr. Marko Mendez

Address: 2100 North Highway 360, No. 1904
Grand Prairie, Texas 75050

Ownership: 33.33 percent

10. § 63.18(i). Applicant further certifies that it has not accepted, nor will it agree 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 Applicant may serve under the authority granted pursuant to this Application.

11. § 63.18(j). Pursuant to 47 C.F.R. §§ 1.2001 through 1.2003, by certification attached hereto, Applicant certifies that no party to the Application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act on 1988, 21 U.S.C. § 853a.
12. Applicant will comply with the accuracy requirements of this section if authorized to provide international communications service.
13. As demonstrated herein, Applicant is legally and technically qualified to provide the services for which it requests authority. For the reasons stated above, Applicant submits that the public interest, convenience and necessity would be furthered by a grant of this Section 214 Application.

WHEREFORE, ComPlus, L.L.C. respectfully requests that the Commission issue the requested Section 214 authorization for the purpose of providing global facilities-based telecommunications services and resold international switched and private-line services of authorized U.S. common carriers for the provision of international service to all permissible international points deemed by the Commission to afford equivalent resale opportunities to U.S. carriers.

Respectfully submitted, this 31st day of December, 1998.

ComPlus, L.L.C.

By:



Doug Copley

Vice President of Sales and Marketing
2100 North Highway 360, No. 1904
Grand Prairie, Texas 75050

Telephone: 972.336.0808

Facsimile: 972.602.7477

Harbor Consulting Group Inc.
4312 92nd Avenue Northwest
Gig Harbor, Washington 98335

Telephone: 253.265.3910

Facsimile: 253.265.3912

Applicant's Regulatory Consultants

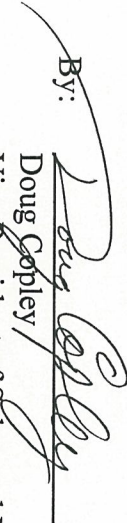
CERTIFICATION OF APPLICANT

I hereby certify that the statements in the foregoing Application for Section 214 authority are true, complete and correct to the best of my knowledge, information and belief and are made in good faith. I hereby certify that ComPlus, L.L.C. ("ComPlus") is not affiliated with any foreign carrier and is not affiliated with any facilities-based carrier whose services ComPlus intends to resell. I hereby certify that ComPlus will not 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 ComPlus may serve under the authority granted under this part. I also hereby certify that no party to the foregoing Application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act on 1988, 21 U.S.C. § 853a.

Dated this 31st day of December, 1998.

ComPlus, L.L.C.

By:

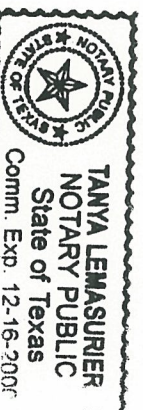

Doug Copley

Vice President of Sales and Marketing
2100 North Highway 360, No. 1904
Grand Prairie, Texas 75050

Subscribed and sworn to before me this 31st day of December, 1998.

Tanya Le Masurier

Notary Public in and for the State of Texas





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TELEPHONE: 253.265.3910
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FACSIMILE COVER SHEET

Date: March 16, 1999

To: Ms. Fran Eisenstein

Company: FCC

Facsimile Number: 202.418.2824

From: Kristin Doyle

No. of Pages Including Cover: 1

If there is any difficulty in receiving this transmission, please call 253.265.3910.

NOTES: Per your request for citizenship information regarding the individuals who are owners of ComPlus, L.L.C., both Marko Mendez and Doug Copley are U.S. citizens.

CONFIDENTIALITY NOTICE

This transmittal and accompanying documents are intended only for the use of the individual or entity to which they are addressed, and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, the reader is hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone to arrange for the retrieval of these documents. Thank you.

LADIA, L.L.C.

February 25, 1999

Mr. Marko Mender
5519 Timber Canyon
San Antonio, TX 78290

Re: ComPlus Communications: Ownership of Ladia, LLC

Dear Mr. Mender:


You have inquired of us in connection with certain applications for telecommunications licenses, questions of the equity ownership of Ladia, LLC.

This will confirm that there exists no owner, direct or indirect, beneficial or otherwise, of Ladia, LLC that in aggregate owns five or more percent of Ladia, LLC and that is not a domiciliary of the United States of America.

It is understood and expected that the above certification will be entered by the United States Federal Communications Commission, and possibly to other regulatory agencies, with the expectation that it will be relied upon by such agencies.

Kindly contact me with any further questions.

Very truly yours,


Frances Lynch
Chief Records Officer

28 Cedar Street
Dulbury, MA 02132
Tel: (781) 524-0280
Tel: (781) 524-0062