

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

ITC-214-19990125-00036

- 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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January 25, 1999

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FCC/INTEL

JAN 25 1999

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

Hand Delivered

Re: Section 214 Application
CEO California Telecommunications, Inc.

Gentlemen/Ladies:

Transmitted herewith, on behalf of CEO California Telecommunications, Inc., are an original and five copies of an application for Section 214 authority to provide facilities-based and resold international telecommunications services between the United States and all authorized international points. This application is entitled to streamlined processing under Section 63.12 of the Commission's Rules.

Attached to the face of this application are a completed FCC Form 159; a check for \$780.00 payable to the Federal Communications Commission to cover the requisite filing fee; and an additional copy of the filing marked "Stamp and Return," which I would appreciate your stamping and returning to me via my messenger.

In the event there are questions concerning this matter, please contact me.

Very truly yours,



R. Edward Price

Enclosure

cc (w/enc.): Ms. Alicia Smothers

interconnected to the public switched network at one or both ends, between the United States and all authorized international points.

I. Introduction

Through this application, CEOC, a California corporation, seeks authority to provide IMTS and IPL service as a facilities-based and resale carrier between the United States and all authorized international points. The public interest in more competitive and economical international communication services is well established and has been addressed by the Commission in numerous decisions. The Commission also has routinely approved applications by common carriers to acquire capacity in private international facilities and has granted applications to resell the IPL services of carriers for the provision of switched services — i.e., International Simple Resale (ISR) — along all approved routes. CEOC therefore submits that streamlined grant of this application is in the public interest pursuant to Section 63.12 of the Commission's Rules.

II. Section 63.18 Information

In accordance with Section 63.18 of the Commission's Rules, the following information is submitted:

- (a) The applicant's name, address and telephone number are as follows:

CEO California Telecommunications, Inc.
223 East De La Guerra Street
Santa Barbara, California 93101
(805) 899-1962

- (b) The applicant is a corporation organized under the laws of California.

- (c) Correspondence concerning this application should be sent to:
- Gregory C. Staple, Esq.
R. Edward Price, Esq.
Koteen & Naffalin, L.L.P.
1150 Connecticut Avenue, N.W.
Suite 1000
Washington, D.C. 20036-4104
(202) 467-5700 (tel.)
(202) 467-5700 (fax)
- (d) The applicant does not currently hold Section 214 authority.
- (e)-(f) The applicant requests facilities-based Section 214 authority pursuant to the terms and conditions of Section 63.18(e)(1) of the Commission's Rules and resale Section 214 authority pursuant to the terms and conditions of Section 63.18(e)(2) of the Commission's Rules to provide service between the United States and all authorized points. The applicant only seeks authority to resell international private lines connected to the switched network where such International Simple Resale (ISR) services have been authorized.
- (g) Inapplicable. The applicant seeks authority to acquire an interest in facilities previously authorized by the Commission.
- (h) (1)-(2) *See* Exhibit 1.
- (3) The applicant is affiliated with STAR Telecommunications, Inc., a non-dominant U.S. international telecommunications carrier, and may resell certain of STAR's switched and private line telecommunications services.
- (4) The applicant will update the information provided in this application as necessary.
- (5)-(6) The United Kingdom and Germany are members of the World Trade Organization.
- (8) *See* Exhibit 1.
- (i) The applicant certifies that it 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) See Exhibit 1.

(k) This application is entitled to streamlined processing under Section 63.12 of the Commission's Rules, 47 C.F.R. § 63.12, because the applicant is non-dominant and all of its foreign carrier affiliates are non-dominant as well. Additionally, the applicant does not seek authority to provide International Simple Resale (ISR) services on routes that have not been approved by the Commission.

III. Conclusion

In view of the information stated above, expeditious grant of this application, pursuant to streamlined processing under Section 63.12 of the Commission's Rules, is warranted and would serve the public interest, convenience and necessity.

Respectfully submitted,

CEO CALIFORNIA
TELECOMMUNICATIONS, INC.

By: _____


Gregory C. Staple
R. Edward Price

KOTTEEN & NAFTALIN, L.L.P.
1150 Connecticut Avenue, N.W.
Suite 1000
Washington, D.C. 20036-4104
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Its Attorneys

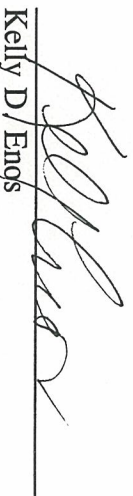
January 25, 1999

CEO California Telecommunications, Inc.
Section 214 Application

EXHIBIT 1 — Section 63.18 Certification

I hereby certify to the following:

- (1) Foreign Carrier Affiliates. CEO California Telecommunications, Inc. (CEOOC) has two foreign carrier affiliates: (1) STAR Europe Ltd., which holds licenses in the United Kingdom to provide facilities-based and resold international services; and (2) STAR Telecommunications Deutschland GmbH, which holds a license in Germany to provide facilities-based international services. Neither of these foreign affiliates have market power in their respective countries. STAR Europe Ltd.'s traffic represents less than five percent of the traffic on the U.S.-U.K. route. STAR Deutschland GmbH only began service recently and also is estimated to have less than five percent of traffic on the U.S.-Germany route.
- (2) CEOOC Ownership. CEOOC is 100% owned by STAR Telecommunications, Inc. (STAR). The only ten percent or greater shareholder of STAR is Christopher E. Edgecomb, 223 East De La Guerra Street, Santa Barbara, California 93101. Mr. Edgecomb is a U.S. citizen and his principal business is telecommunications.
- (3) Interlocking Directorates. Mary Casey, president and a director of CEOOC, is also president and a director of STAR and CEO Telecommunications, Inc. (CEO), another U.S. international carrier subsidiary of STAR. Kelly D. Enos, chief financial officer and secretary of CEOOC, is also chief financial officer, treasurer and a director of STAR and is the secretary and a director of CEO. James Kolstrud, vice president and a director of CEOOC, is also executive vice president of STAR and vice president and a director of CEO.
- (4) Special Concessions. CEOOC 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.
- (5) Anti-Drug Abuse Act Certification. In accordance with the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, and Sections 1.2001-1.2003 of the Commission's Rules, 47 C.F.R. § 1.2001-1.2003, neither CEOOC nor any of its officers, directors, or five percent of greater shareholders is subject to a denial of U.S. federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
- (6) I am authorized to make this certification on behalf of CEOOC.



Kelly D/ Enos

Chief Financial Officer

January 13, 1999

CEO California Telecommunications, Inc.