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February 18, 1999

VIA FACSIMILE

Alicia Smothers
Telecommunications Division
International Bureau
Federal Communications Commission
2000 M Street, N.W.
Washington, DC 20554

Re: Application of Lightship Telecom, LLC for Global Authority Pursuant to Section
214 of the Communications Act of 1934, as amended, to Operate as an
International Facilities-based Carrier and as an International Resale Carrier –
ITC-214-19990203-00056

Dear Ms. Smothers:

In the context of the above-referenced application, you have asked that Lightship Telecom, LLC ("Lightship") explain the ownership of Osprey Partners, L.L.C. and DNK Partners, which were listed as holders of ten percent (10%) or greater direct or indirect shareholder or other equity interests in Lightship.

As the Application explains, Lightship is a wholly-owned subsidiary of Lightship Holdings, L.L.C. ("Lightship Holdings"). Osprey Partners, L.L.C. has a greater than ten percent interest in Lightship Holdings. Therefore, Osprey Partners has a greater than ten percent (10%) interest in Lightship. The members of Osprey Partners that are ten percent or greater (10%) indirect holders of an interest in Lightship are DNK Partners and a trust administered by the Market Street Trust Company, which are listed in the application. DNK Partners, in turn, is owned by James D. Houghton and Nina Houghton, who are also listed in the application as holders of a ten percent (10%) or greater direct or indirect shareholder or other equity interest in Lightship.

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If you have any additional questions, please do not hesitate to call me at (202) 424-7657.

Sincerely,



Morton J. Posner

Counsel for Lightship Telecom, LLC

cc: Kevin O'Hare

Paul Garnett