

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: _____

COPY

APPROVED BY OMB 3060-0589

READ INSTRUCTIONS CAREFULLY BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE

FCC/PAGE NO. 1 OF 1 FEB 16 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) DCI Telecommunications, Inc. (3) TOTAL AMOUNT PAID (dollars and cents) 780.00

(4) STREET ADDRESS LINE NO. 1 c/o Holland & Knight LLP

(5) STREET ADDRESS LINE NO. 2 2100 Pennsylvania Avenue, N.W., Suite 400

(6) CITY Washington

(7) STATE DC

(8) ZIP CODE 20037-3202

(9) DAYTIME TELEPHONE NUMBER (include area code) (202) 828-1849

(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) C U T (21A) QUANTITY 1 (22A) FEE DUE FOR (PTC) IN BLOCK 20A 780.00 FCC USE ONLY

(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 FCC USE ONLY

(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 FCC USE ONLY

(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 FCC USE ONLY

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

SECTION D - TAXPAYER INFORMATION (REQUIRED)

(25) PAYER TIN 0 8 4 1 1 5 5 0 4 1 (26) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-1 IS DIFFERENT FROM PAYER NAME IN A-2 APPLICANT TIN 0

SECTION E - CERTIFICATION

(27) CERTIFICATION STATEMENT I, Eric Fishman, Esq. (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 *Eric Fishman*

SECTION F - CREDIT CARD PAYMENT INFORMATION

(28) MASTERCARD/VISA ACCOUNT NUMBER: MASTERCARD

EXPIRATION DATE: MONTH YEAR

VISA

AUTHORIZED SIGNATURE

I hereby authorize the FCC to charge my VISA or MASTERCARD for the service(s)/authorization(s) herein described.

Law Offices

HOLLAND & KNIGHT LLP

2100 Pennsylvania Avenue, N.W.
Suite 400
Washington, D.C. 20037-3202
202-955-3000
FAX 202-955-5564
<http://www.hklaw.com>

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Boca Raton	Northern Virginia
Fort Lauderdale	Orlando
Jacksonville	San Francisco
Lakeland	St. Petersburg
Melbourne	Tallahassee
Mexico City	Tampa
Miami	West Palm Beach

February 16, 1999

ERIC FISHMAN
202-828-1849

Internet Address:
efishman@hklaw.com

VIA R&S COURIER

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

Re: Section 214 Application of DCI Telecommunications, Inc.

Dear Sir or Madam:

Transmitted herewith in triplicate on behalf of DCI Telecommunications, Inc. is an application for authority under Section 214 of the Communications Act of 1934, as amended, to provide international telecommunications services. Also submitted is FCC Form 159 and a check for \$780.00 to cover the filing fee.

An extra copy of the filing is submitted. Please date-stamp the extra copy and return it to the undersigned counsel.

Should you have any questions regarding this filing, please feel free to contact the undersigned counsel directly.

Very truly yours,

HOLLAND & KNIGHT LLP



Eric Fishman
Counsel for DCI Telecommunications, Inc.

Enclosure

DCI TELECOMMUNICATIONS, INC.

611 ACCESS ROAD
STRATFORD, CONNECTICUT 06615
(203) 380-0910

FLEET BANK
HARTFORD, CONNECTICUT 06115

51-57/119

2159

CHECK DATE

02/11/99

CONTROL NO.

002159

AMOUNT

\$*****780.00

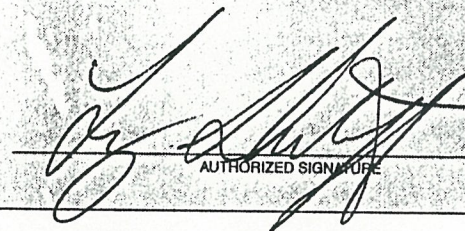
PAY

Seven Hundred Eighty and 00/100

Dollars

Federal Communications Commis.

TO THE
ORDER
OF



AUTHORIZED SIGNATURE

Security features. Details on back

⑈002159⑈ ⑆011900571⑆ 93701 76696⑈

Switzerland, Japan, Italy, Ireland and Hong Kong for the provision of switched service between the United States and those countries.

DCI is a publicly held corporation organized under the laws of the State of Colorado for the purpose of providing telecommunications services. Its majority shareholders of DCI are: Joseph J. Murphy and IXC Communications, Inc., which hold 14% and 13% ownership interests in the company, respectively.

DCI believes that there is significant potential for continued growth in the international voice, data and facsimile markets, and that this market expansion will be accelerated by additional competition by new entrants. This position is consistent with Commission findings that increased competition in international markets is beneficial. See, e.g., Teltec Saving Communications Co., Mimeo No. 3548 (released April 4, 1986), and cases cited therein. The Commission also found that the market will support additional carriers and that the added competition will be in the public interest. Accordingly, the Commission has authorized new entrants that propose to resell international services. Id. See also FTC, Inc., 6 FCC Rcd 2237 (1991).

DCI proposes by this application to provide international switched and private line services from the United States to international points through its own facilities and through the resale of other carriers' services. The Commission has determined that, as a matter of policy, introduction of additional competition in the provision of international services creates incentives for carriers to offer new and innovative services and to

reduce prices, which inure to the public interest and benefit.¹ Grant of this application would serve the Commission's purposes and accord with the Commission's commitment to open entry to the U.S. telecommunications market. Moreover, many carriers provide international services in the United States, including AT&T, MCI WorldCom, Sprint and others.

By the instant application, DCI seeks authority to resell international private lines between the United States and Canada, the United Kingdom, Australia, New Zealand, Sweden, Australia, the Netherlands, Luxembourg, Norway, Denmark, France, Germany, Belgium, Austria, Switzerland, Japan, Italy, Ireland and Hong Kong for the provision of international switched services between the United States and those countries. In *Regulation of International Accounting Rates*, 7 FCC Rcd 559 (1992), the Commission found that such resale between the United States and countries affording "equivalent opportunities" for such resale would afford numerous public interest benefits, including increased demand, reduced prices, the virtual elimination of price discrimination, and the exertion of pressure to reduce above-cost accounting rates. More recently, the Commission has determined that the aforementioned countries afford such "equivalent opportunities" and granted the applications of companies to provide resold interconnected private line services between the United States and those countries. See Public Notice Report No. TEL-00017, released October 15, 1998; *AT&T Corp.*, DA 98-2555, released December 17, 1998; *AT&T Corp.*, DA 98-2654, released January 4, 1999.

¹ See, e.g., *TDX Systems, Inc.*, File No. ITC-86-108, released September 2, 1986; *Argo Communications International, Inc.*, 1 FCC Rcd 578 (1986); *BT North America, Inc.*, ITC-95-178, released April 20, 1995.

DCI believes that the added competition that its entry will bring to the market will benefit United States consumers of overseas data and voice services. These benefits include competitive pricing and increased availability of a variety of service options. The grant of this authorization will therefore further the public interest.

In support of DCI's request for authorization, the following information is submitted pursuant to Section 63.18 of the Commission's rules, as amended, 47 C.F.R. § 63.18 (1996):

- (a) Name and address of Applicant:
DCI Telecommunications, Inc.
611 Access Road
Stratford, CT 06615
Attention: Larry Shatsoff, Vice President and COO
Telephone No.: (203) 380-0910
- (b) Applicant is a corporation organized under the laws of the State of Colorado.
- (c) Correspondence concerning this Application should be sent to:

Eric Fishman, Esq.
Holland & Knight, LLC
2100 Pennsylvania Avenue, NW
Washington, DC 20037
(202) 828-1849

with a copy to:

Larry Shatsoff, Vice President and COO
DCI Telecommunications, Inc.
611 Access Road
Stratford, CT 06615
(203) 380-0910

- (d) Applicant has not previously received authority under Section 214 of the Communications Act, as amended. By grant of this Application, DCI would become a nondominant international carrier for the provision of interexchange service, subject to Section 214 of the Act.
- (e) DCI hereby requests Section 214 authority to operate as a facilities-based carrier pursuant to the terms and conditions of Section 63.18(e)(1) of the rules, and as a resale carrier pursuant to the terms and conditions of Section 63.18(e)(2) of the rules. The authorization sought in this application will be used to extend DCI's telecommunications services from the United States to international points which DCI seeks to serve. Applicant further proposes to resell international private lines between the United States and Canada, the United Kingdom, Australia, New Zealand, Sweden, The Netherlands, Luxembourg, Norway, Denmark, France, Germany, Belgium, Austria, Switzerland, Japan, Italy, Ireland and Hong Kong for the provision of international switched services between the United States and those countries. As noted elsewhere in this Application, the Commission has previously determined that equivalent resale opportunities exist between these countries and the United States.
- (f) At this time DCI is not requesting other authorizations to construct any international facilities between the points for which it is applying to provide resold services.

- (g) Does not apply (Applicant is not seeking facilities-based authority pursuant to Section 63.18(e)(6) of the rules).
- (h) See attached certification.
- (i) See attached certification.
- (j) See attached certification.

Conclusion

As demonstrated in this Application, DCI is legally, financially and technically qualified to provide the service for which it requests authority. For the reasons stated above, DCI submits that the public interest, convenience and necessity would be furthered by a grant of this Section 214 application. The requested authorization should therefore be issued to DCI to enable it to provide international basic switched, private line, data, video and business services to all international points pursuant to Section 63.18(e)(1) of the Commission's rules, and pursuant to Section 63.18(e)(2) of the Commission's rules, to resell the international switched and private line services of authorized U.S. common carriers for the provision of international basic switched, private line, data, video and business services to all international points, including authority to resell private lines between the United States and Canada, the United Kingdom, Australia, New Zealand, Sweden, the Netherlands, Luxembourg, Norway, Denmark, France, Germany, Belgium, Austria, Switzerland, Japan, Italy, Ireland and Hong Kong for the provision of switched services between the United States and those countries.

CERTIFICATION

Applicant hereby certifies that it has no affiliation, as defined by Section 63.18 of the Commission's rules, with any foreign carriers, and that it has no interlocking directorates with other Section 214 certificated telecommunications carriers, except as set forth herein. In support of this certification, Applicant hereby states as follows:

DCI is a publicly traded corporation whose principal shareholders of DCI are: Joseph J. Murphy and IXC Communications, Inc., which hold 14% and 13% ownership interests in the company, respectively. Mr. Murphy is a U.S. citizen, and IXC Communications is a publicly traded Delaware corporation. IXC Communications is a telecommunications common carrier, certificated under Section 214 of the Act.

The names of the officers and directors of DCI are: Joseph J. Murphy (President and CEO); Larry Shatsoff (Vice President and COO); Russell B. Hintz (Vice President, CFO); Daniel J. Murphy (Vice President, Financial Planning); John J. Adams (Chief Marketing Officer, Director); Carter H. Hills (Director); and Lois Morris (Director). All of the aforementioned individuals are U.S. citizens.

Interlocking Directorates. DCI has no interlocking directorates.

Foreign Affiliations. DCI is the corporate parent of DCI Europe, Ltd., a UK corporation, which is authorized under the laws of the United Kingdom to provide telecommunications services. The company's principal competitors in the United Kingdom are British Telecom, the dominant supplier of telecommunications services in the United Kingdom, and Mercury. The company also faces competition from emerging

licensed public telephone operators, who are constructing their own facilities-based networks (such as Energis), and from resellers including WorldCom, Esprit and Global One.

No Special Concessions. DCI hereby certifies that DCI Europe lacks the ability to discriminate against unaffiliated U.S. international carriers through control of bottleneck services or facilities in the named foreign countries. DCI further certifies that neither it nor any of its subsidiaries has agreed to accept special concessions directly or indirectly from any foreign carrier or administration with respect to traffic or revenue flows between the United States and any foreign country which it may serve, and will not enter into such agreements in the future.

DCI further certifies that, with the exception of certain switches and submarine fiber facilities, none of the above-described foreign carriers owns or controls telecommunications facilities, as defined in Section 63.18(h)(4) of the Commission's rules (i.e., the underlying telecommunications transport means, including intercity and local access facilities, used by such foreign carriers to provide international telecommunications services offered to the public) in the destination countries set forth above.

By:

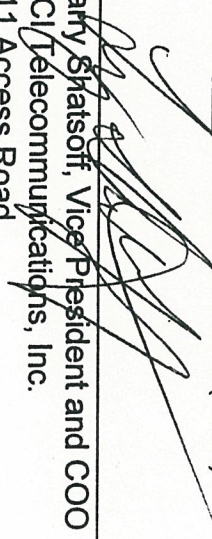


Larry Shatsoff, Vice President and COO
DCI Telecommunications, Inc.
611 Access Road
Stratford, CT 06615
(203) 380-0910

CERTIFICATION

Pursuant to Section 1.2002 of the Commission's rules, DCI Telecommunications, Inc. hereby certifies that it is not subject to a denial of Federal benefits, including FCC benefits, by Federal and/or state courts under authority granted by Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853a. See 6 FCC Rcd 7551 (1991).

By:

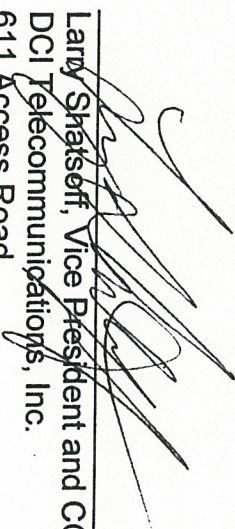


Larry Shatsoff, Vice President and COO
DCI Telecommunications, Inc.
611 Access Road
Stratford, CT 06615
(203) 380-0910

DECLARATION

I, Larry Shatsoff, am Vice President and Chief Operating Officer of DCI Telecommunications, Inc. I have read the foregoing Section 214 Application and hereby declare, under penalty of perjury, that all statements contained therein are true and correct.

By:



Larry Shatsoff, Vice President and COO
DCI Telecommunications, Inc.

611 Access Road
Stratford, CT 06615
(203) 380-0910

February
~~January~~ 11, 1999

Law Offices

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Melbourne	Tallahassee
Mexico City	Tampa
Miami	West Palm Beach

March 3, 1999

ERIC EISENMAN
202-828-1849

Internet Address:
eeisenman@hklaw.com

By Telecopy (1-202-418-2824) and Courier Delivery

Frances G. Eisenstein, Esq.
International Bureau
Federal Communications Commission
2000 M Street, N.W.
Room 843
Washington, D.C. 20554

Re: Application of DCI Telecommunications, Inc. for Section
214 Authority

Dear Ms. Eisenstein:

Pursuant to our conversation this morning, the purpose of this letter is to advise the Commission that, according to the SEC filings of IXC Communications, Inc., 10% or greater ownership interests in that company are held by the following entities:

Trustees of General Electric Pension Trust	26.6%
All directors and officers of IXC Communications as a group (15 persons)	21.6%

It is the understanding of the undersigned counsel to DCI Telecommunications, Inc. that the trustees of General Electric Pension Trust and all directors and officers of IXC Communications are U.S. citizens.

Please associate this letter with the above-captioned application of DCI Telecommunications, Inc. for global resale and facilities-based operation authority under Section 214 of the Communications Act, as amended.

Frances G. Eisenstein, Esq.
March 3, 1999
Page 2

Should any questions arise concerning this matter, please feel free to contact the undersigned counsel directly.

Sincerely,



Eric Fishman
Attorney for
DCI Telecommunications, Inc.