

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

PAGE NO. 1 OF 1  
FEB 17 1999  
FCC/MILLITON

COPY

APPROVED BY OMB 3060-0589

(1) LOCKBOX # 358115

SPECIAL USE  
FCC USE ONLY

SECTION A - PAYER INFORMATION

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card)  
Arter & Hadden LLP

(3) TOTAL AMOUNT PAID (dollars and cents)  
\$ 630.00

(4) STREET ADDRESS LINE NO. 1  
c/o James U. Troup

(5) STREET ADDRESS LINE NO. 2  
1801 K Street, N.W., Suite 400K

(6) CITY  
Washington

(7) STATE  
DC

(8) ZIP CODE  
20006-1301

(9) DAYTIME TELEPHONE NUMBER (include area code)  
(202) 775-7960

(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)  
Cumberland Long Distance, Inc.

(12) STREET ADDRESS LINE NO. 1  
121 Main Street

(13) STREET ADDRESS LINE NO. 2  
P.O. Box 20

(14) CITY  
Cumberland

(15) STATE  
IA

(16) ZIP CODE  
50843

(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  
C U T

(20A) PAYMENT TYPE CODE (PTC)

(21A) QUANTITY

(22A) FEE DUE FOR (PTC) IN BLOCK 20A  
\$ 630.00

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 3 4 0 7 3 2 8 8 8

(26) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-1 IS DIFFERENT FROM PAYER NAME IN A-2  
APPLICANT TIN  
0 4 2 1 4 8 1 6 8 3

SECTION E - CERTIFICATION

(27) CERTIFICATION STATEMENT  
I, Cara E. Sheppard  
(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:

MasterCard/VISA account number grid

EXPIRATION DATE:

Expiration date grid

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)

# ARTER & HADDEN LLP

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February 17, 1999

## VIA BERRY BEST SERVICES

Federal Communications Commission  
IB Telecommunications Division  
P.O. Box 358115  
Pittsburgh, PA 15251-5115

Re: Cumberland Long Distance Inc.

Dear Sir or Madam:

Enclosed herewith, pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, and Section 63.01 of the Commission's Rules, 47 C.F.R. § 63.01, are an original and five copies of the application of Cumberland Long Distance Inc. ("Cumberland") for authority to resell services of other common carriers to provide telephone services from the contiguous United States to international points. No officer, director, or stockholder of Cumberland is an agent or representative of a foreign telecommunications entity.

Attached is the statutory processing fee in the form of a personal check payable to the Federal Communications Commission in the amount of \$780.00 and F.C.C. Form 159.

Acknowledgment and date of receipt of this filing is requested. A duplicate copy of this letter is provided for this purpose.

# ARTER & HADDEN LLP

Federal Communications Commission

February 17, 1999

Page 2

All correspondence and inquiries in connection with this filing should be addressed to:

James U. Troup  
Arter & Hadden LLP  
1801 K Street, N.W.  
Suite 400K  
Washington, D.C. 20006  
(202) 775-7960

Respectfully submitted,

CUMBERLAND LONG DISTANCE INC.



James U. Troup  
Cara E. Sheppard\*

Its Attorneys

Enclosures

Admitted only in Connecticut and Maryland; supervision by James U. Troup, a member of the DC Bar.

189227

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

In the Matter of )  
                          ) )  
Cumberland Long Distance Inc.               ) ) )  
  ) )  
Application for Authority                      ) )  
to Resell International Message               ) )  
Telecommunications Service                      ) ) )  
as a Common Carrier                              ) ) )

File No. \_\_\_\_\_

APPLICATION FOR AUTHORITY UNDER  
SECTION 214 OF THE COMMUNICATIONS ACT

Cumberland Long Distance Inc. ("CLD") hereby requests, pursuant to Section 214 of the Communications Act and Sections 63.18 (e) (2) and 63.12 of the Commission's Rules,<sup>1</sup> authority to resell international message telephone service ("IMTS") between points in the United States to various international points by reselling the services of unaffiliated carriers. CLD is a wholly owned subsidiary of Cumberland Telephone Company, a rural telephone company providing service in Iowa.

Because CLD is not affiliated with a foreign carrier and is not affiliated with the U.S. facilities-based carriers whose international services it wishes to resell, CLD's application should properly qualify for streamlined treatment under Section 63.12 of the Commission's Rules unless formally opposed.<sup>2</sup>

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<sup>1</sup>See 47 U.S.C. Section 214; 47 C.F.R., Sections 63.18 (e) (2); 63.12.

<sup>2</sup>47 C.F.R. Section 63.12.

CLD's entry into the international market will promote competition and stimulate more efficient use of telecommunications resources. Moreover, CLD is legally, financially, and technically qualified to provide the requested services. In support of CLD's request for authorization, the following information is set forth pursuant to Section 63.18:

- (a) The name and address of the applicant is:  
  
Cumberland Long Distance Inc.  
Main Street P. O. Box 20  
Cumberland, Iowa 50843
- (b) CLD is incorporated under the laws of the State of Iowa.
- (c) Correspondence concerning this application should be sent to:

Bruce Rogers  
President  
Cumberland Long Distance Inc.  
Main Street P. O. Box 20  
Cumberland, Iowa 50843

With a copy to applicant's counsel:

James U. Troup  
Arter & Hadden  
1801 K Street, N.W.  
Suite 400K  
Washington, D. C. 20006  
(202) 775-7960

- (d) Applicant is not presently subject to Section 214 of the Act, but will become subject to Section 214 as a result of its proposed international service resale operations.

(e) The applicant is requesting authority to resell the international services of authorized U.S. common carriers for the provision of international basic switched, private line, data, television and business services to all international points. Thus, it is requesting authority to operate as a resale carrier pursuant to the terms and conditions of Section 63.18 (e) (2). At this time, the applicant is not seeking authority to operate as a facilities-based carrier.

#### Certifications

- (1) CLD hereby certifies that it is not owned by or affiliated with a foreign carrier for purposes of Section 63.18 (h) of the Commission's Rules.<sup>3</sup>
- (2) In support of this certification CLD provides the following stockholder information:
- CLD is a wholly owned subsidiary of Cumberland Telephone Company of Cumberland, Iowa.
  - No shareholder has ten percent or greater ownership in Cumberland Telephone Company.
  - There are no interlocking directorates.

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<sup>3</sup>47 C.F.R. Section 63.18 (h).

- (3) CLD certifies that it (1) shall maintain separate books of accounts from Cumberland Telephone Company; (2) shall not jointly own transmission or switching facilities with Cumberland Telephone Company; and (3) shall take any tariffed services from Cumberland Telephone Company pursuant to the terms and conditions of the LEC's generally applicable tariff. In addition, CLD will be treated as a non-regulated affiliate for purposes of local exchange carrier accounting under the Commission's joint cost and affiliate transactions rules as set forth in Parts 32 and 64 of the Commission's rules.
- (4) CLD hereby certifies that it is not affiliated with the U.S. carriers whose facilities-based services it proposes to resell.
- (5) CLD hereby certifies that no party to the application is subject to a denial of the Federal benefits requested herein pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.<sup>4</sup>
- (6) CLD hereby certifies that it has not agreed 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 it may serve under the authority granted under this part and will not enter into such agreements in the future.

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<sup>4</sup>21 U.S.C. Section 853 (a).



CONCLUSION

In light of the foregoing, CLD respectfully submits that the public interest, convenience and necessity would be served by a grant of the Section 214 application sought, and therefore requests that such authorization be issued to CLD for purposes of reselling IMTS between points in the United States and various international points.

Respectfully submitted,  
Cumberland Long Distance Inc.

By:   
Bruce Rogers  
President  
Cumberland Long Distance Inc.

Dated: 2-10, 1999

DETACH AND RETAIN THIS STATEMENT  
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.  
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

**Arter & Hadden LLP**  
1801 K Street, NW  
Suite 400K  
Washington, DC 20006

**310310**

**2874 Federal Communications Commission**

INVOICE DATE            INVOICE NUMBER  
02/17/99                780.00  
Section 214 Filing Fee--CESheppard

AMOUNT  
780.00

TOTAL                    \$\*\*\*\*\*780.00

000001  
002323

THIS CHECK IS VOID WITHOUT A BLUE & GREEN BACKGROUND AND AN ARTIFICIAL WATERMARK CERTIFICATION SEAL ON THE BACK - HOLD AT ANGLE TO VIEW SEAL

**Arter & Hadden LLP**  
1801 K Street, NW  
Suite 400K  
Washington, DC 20006

Bank One  
Cleveland, OH

**310310**

CHECK DATE  
02/17/99

PAY \*\*\*\*\*Seven Hundred Eighty & 00/100 DOLLARS  
\$\*\*\*\*\*780.00

Federal Communications Commission

TO THE ORDER OF

Arter & Hadden LLP

VOID AFTER ONE YEAR FROM ISSUE DATE

SIGNATURE HAS A COLORED BACKGROUND • BORDER CONTAINS MICROPRINTING

⑈0000310310⑈

⑆04415443⑆

621581347⑈