

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: _____

READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE

APPROVED BY OMB 3080-0599

(1) LOCKBOX #

PAGE NO. 1 OF 1

SPECIAL USE
FCC USE ONLY
MAR 10 1993

SECTION A - PAYER INFORMATION

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card)
COMMUNICATIONS NETWORK INTERNATIONAL, LTD.
(3) TOTAL AMOUNT PAID (dollars and cents)
\$ 780.00
(4) STREET ADDRESS LINE NO. 1
53 DARBY ROAD
(5) STREET ADDRESS LINE NO. 2

(6) CITY
PAOLI
(7) STATE
PA
(8) ZIP CODE
19301
(9) DAYTIME TELEPHONE NUMBER (include area code)
(610) 647-5555
(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
(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
\$
(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
\$
(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
\$
(23D) FCC CODE 1
(24D) FCC CODE 2

SECTION D - TAXPAYER INFORMATION (REQUIRED)

(25) PAYER TIN
2 3 2 6 9 2 7 2 3
(26) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-11 IS DIFFERENT FROM PAYER NAME IN A-2
APPLICANT TIN

SECTION E - CERTIFICATION

(27) CERTIFICATION STATEMENT
I, Rebecca J. Antico (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
Rebecca J. Antico

SECTION F - CREDIT CARD PAYMENT INFORMATION

(28) MASTERCARD
VISA
MAY I authorize the FCC to charge my VISA or MASTERCARD
for the amount(s) authorized herein described?
YES NO
EXPIRATION DATE: MONTH YEAR
AUTHORIZED SIGNATURE
DATE: MONTH YEAR
SEE PUBLIC BURDEN ESTIMATE ON REVERSE
FCC FORM 159 JULY 1997 (REVISED)

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

In the Matter of

**COMMUNICATIONS NETWORK
INTERNATIONAL, LTD.**

Application for Authorization Pursuant
to Section 214 of the Communications
Act of 1934, as Amended, to Operate
Both as a Reseller and as a Facilities-
based Provider of International
Telecommunications Services
Pursuant to a Certificate of Public
Convenience and Necessity

File No. _____

**APPLICATION OF
COMMUNICATIONS NETWORK INTERNATIONAL, LTD
FOR SECTION 214 AUTHORIZATION AND
CERTIFICATE OF PUBLIC
CONVENIENCE AND NECESSITY**

Lawrence L. Willis, President
COMMUNICATIONS NETWORK INTERNATIONAL, LTD.
53 Darby Road
Paoli, PA 19301
(610) 647-5555

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D. C. 20554**

In the Matter of
**COMMUNICATIONS NETWORK
INTERNATIONAL, LTD.**

Application for Authorization Pursuant
to Section 214 of the Communications
Act of 1934, as Amended, to Operate
Both as a Reseller and as a Facilities-
based Provider of International
Telecommunications Services
Pursuant to a Certificate of Public
Convenience and Necessity

File No. _____

**APPLICATION FOR SECTION 214 AUTHORIZATION AND
CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY**

Pursuant to title II of the Communications Act of 1934, as amended, COMMUNICATIONS NETWORK INTERNATIONAL, LTD., ("Applicant" or "CNI"), a Pennsylvania corporation, hereby requests authority to operate both as a reseller and as a facilities-based provider of international telecommunications services. CNI intends to provide telecommunications services primarily through the resale of services offered by other carriers initially and, later, as a facilities-based provider of international telecommunications services.

In support of this Application, the following information is submitted:

I Public Interest Considerations

The market for interexchange telecommunications services continues to be dominated by AT&T Communications. Directly related to that dominance are economies of scale and scope realized by AT&T which cannot be achieved by other interexchange carriers. In the face of such economies favoring the dominant carrier and the struggle to establish viable competition in the interexchange telecommunications market, it is essential that the Federal Communications Commission ("FCC" or "Commission") encourage market entry by non-dominant carriers seeking success in the interexchange market. This is particularly true in the instant case where CNI intends to offer a competitively priced interexchange service for its customers while providing high quality customer service.

Over the past several years, the commission has seen graphic evidence of cost-driven pressure on carriers endeavoring to maintain a viable position in the interexchange market, in competition with AT&T, through multiple consolidations of formerly independent interexchange carriers.

In this environment of scope/scale economies and cost-driven consolidations, **CNI** believes that the entrance of new carriers into the market for international telecommunications is essential to the maintenance of a viable competitive interexchange telecommunications market.

The management and operations expertise of the **CNI** team will enable **CNI** to begin offering competitive high-quality service immediately upon the grant of the authority requested herein first as a reseller, and eventually as a facilities-based provider, in selected markets. Thus, Commission grant of this Application will significantly serve the public interest through enhanced competition in the market for interexchange telecommunications services through the addition of a well managed new entrant into the market.

II FCC Authority Sought

The Applicant requests such authority as may be required under Title II of the Communications Act of 1934, as amended, specifically Section 214 of the Act and Part 63 of the Commission's Rules, for issuance of a Certificate of Public Convenience and Necessity to **CNI** to operate both as a reseller and as a facilities-based provider of telecommunications services between the United States on the one hand and those international points listed in **CNI's** tariff designated Tariff F.C.C. No. 2 on the other hand. The Applicant requests that this Application be processed in accordance with the Commission's procedures for streamlined processing, 47 C.F.R. §63.12. Accordingly, **CNI** will hereafter address the criteria established by the Commission's Rules for approval of such a request.

To address the specific criteria established by Part 63 of the Commission's Rules for approval of the international authorization requested, the Applicant hereafter submits the information required by Section 63.18 of those rules. **CNI** notes that this Section 63.18 information is limited to the provision of international telecommunications services.

II. Section 63.18 Information

(a) Name and address of the applicant:

Lawrence L. Willis
COMMUNICATIONS NETWORK INTERNATIONAL, LTD
53 Darby Road
Paoli, PA 19301
(610) 647-5555

(b) **COMMUNICATIONS NETWORK INTERNATIONAL, LTD.** is a corporation organized under the laws of the State of Pennsylvania.

(c) Correspondence or communications concerning this Application should be directed to:

Rebecca J. Antico, Regulatory Consultant
Telecom Tariff Consultants
P. O. Box 275
Center Lovell, ME 04016
(207) 928-2144

with a copy to :

Lawrence L. Willis
COMMUNICATIONS NETWORK INTERNATIONAL, LTD
53 Darby Road
Paoli, PA 19301
(610) 647-5555

(d) Applicant has not previously received authority under Section 214 of the Communications Act of 1934.

(e) Applicant is requesting Section 214 authority to operate as a reseller of international basic switched, private line, data, television and business services pursuant to the terms and conditions of Section 63.18(e)2.

(f) Applicant is also requesting Section 214 authority to operate as a facilities-based carrier pursuant to the terms and conditions of paragraph 63.18(e)(1).

(g) Applicant does not propose to undertake any construction, extension, acquisition or operation of transmission facilities. Moreover, the proposed project is categorically excluded as defined by 47 CFR 1.1306, because the Applicant's proposal does not involve high intensity lighting or a site location specified in 47 CFR 1.307(b).

(h) The Applicant does not have an affiliation with a foreign carrier. The Applicant does not have an affiliation with any U.S. facilities-based international carrier whose services will be resold. All shareholders are U.S. citizens. Officers, and shareholders holding 10% or greater interest in the company as follows:

Name	Address	Citizenship	Principal Business
<i>Lawrence L. Willis</i>	<i>53 Darby Raod Paoli, Pa 19301</i>	<i>United States</i>	<i>Telecommunications</i>
<i>Joseph Coffey</i>	<i>700 Long Lane Upper Darby, Pa 19082</i>	<i>United States</i>	<i>Telecommunications</i>
<i>Curtis A. Cooke</i>	<i>53 Darby Road Paoli, Pa 19301</i>	<i>United States</i>	<i>Telecommunications</i>

(i) **CNI** has agreed not 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 the Applicant may serve under the authority granted under this part and will not enter into any such agreements in the future.

(j) No party to this Application is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

In summary, **CNI** submits that this Application is clearly non-controversial. The carrier for which Section 214 authority is sought will be one of a number of non-dominant carriers providing international service under the Commission's jurisdiction. Moreover, the vitality of the competitive market for international telecommunications services is dependent on Commission encouragement of new entrants into the market.

Attached are the Applicant's certifications that the Applicant is not affiliated with the U.S. facilities-based international carriers the Applicant will be reselling, is not affiliated with any foreign carrier, has agreed to not accept special concessions directly or indirectly from any foreign carrier, and has not been denied funds from the federal government under Section 53-01 of the Anti-Drug Abuse Act of 1988.

WHEREFORE, COMMUNICATIONS NETWORK INTERNATIONAL, LTD.

respectfully urges the Commission to promptly grant this Application for such authority as may be required pursuant to Section 214 of the Act and grant a Certificate of Public Convenience and Necessity to **COMMUNICATIONS NETWORK INTERNATIONAL, LTD.**

Respectfully submitted,

COMMUNICATIONS NETWORK INTERNATIONAL, LTD.

By: 

Rebecca J. Antico, Regulatory Consultant

For Lawrence L. Willis, President

COMMUNICATIONS NETWORK INTERNATIONAL, LTD.

53 Darby Road

Paoli, PA 19301

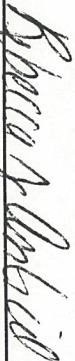
(610) 647-5555

CERTIFICATION OF APPLICANT

I hereby certify that the statements contained in the attached **COMMUNICATIONS NETWORK INTERNATIONAL, LTD.**'s Application for Authorization Pursuant to Section 214 of the Communications Act of 1934, as Amended, to Operate both as a Reseller and Facilities-based Provider of International Telecommunications Services Pursuant to a Certificate of Public Convenience and Necessity are true and correct to the best of my knowledge and are made in good faith.

COMMUNICATIONS NETWORK INTERNATIONAL, LTD.

By:



Rebecca J. Antico, Regulatory Consultant

For Lawrence L. Willis, President

COMMUNICATIONS NETWORK INTERNATIONAL, LTD.

53 Darby Road

Paoli, PA 19301

(610) 647-5555

CERTIFICATION OF APPLICANT

Section 63.18(j)

I hereby certify that **COMMUNICATIONS NETWORK INTERNATIONAL, LTD.** has not been denied funds from the federal government under Section 53-01 of the Anti Drug Abuse Act of 1988.

COMMUNICATIONS NETWORK INTERNATIONAL, LTD.

By:



Rebecca J. Antico, Regulatory Consultant

For Lawrence L. Willis, President

COMMUNICATIONS NETWORK INTERNATIONAL, LTD.

53 Darby Road

Paoli, PA 19301

(610) 647-5555

CERTIFICATION OF APPLICANT

Section 63.18(i)

I hereby certify that **COMMUNICATIONS NETWORK INTERNATIONAL, LTD.** has agreed not to accept special concessions directly or indirectly from any foreign carrier of administration with respect to traffic or revenue flows between the U.S. and any foreign country which the Applicant may serve under the authority granted under this part and will not enter into any such agreements in the future.

COMMUNICATIONS NETWORK INTERNATIONAL, LTD.

By:



Rebecca J. Amico, Regulatory Consultant

For Lawrence L. Willis, President

COMMUNICATIONS NETWORK INTERNATIONAL, LTD.

53 Darby Road

Paoli, PA 19301

(610) 647-5555

CERTIFICATION OF APPLICANT

Section 63.18(h)(i)

I hereby certify that **COMMUNICATIONS NETWORK INTERNATIONAL, LTD.** is
not affiliated with any foreign carrier.

COMMUNICATIONS NETWORK INTERNATIONAL, LTD.

By:



Rebecca J. Antico, Regulatory Consultant
For Lawrence L. Willis, President
COMMUNICATIONS NETWORK INTERNATIONAL, LTD.
53 Darby Road
Paoli, PA 19301
(610) 647-5555

CERTIFICATION OF APPLICANT

I hereby certify that **COMMUNICATIONS NETWORK INTERNATIONAL, LTD.** is not affiliated with any U.S. facilities-based international carriers whose services are being resold.

COMMUNICATIONS NETWORK INTERNATIONAL, LTD.

By:



Rebecca J. Antico, Regulatory Consultant

For Lawrence L. Willis, President

COMMUNICATIONS NETWORK INTERNATIONAL, LTD.

53 Darby Road

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