

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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**PC/MELLOW**

**MAR 11 1999**

LAW OFFICES OF  
**PAUL, HASTINGS, JANOFSKY & WALKER LLP**

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March 11, 1999

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WRITER'S DIRECT ACCESS

OUR FILE NO.

(202) 508-9530

28974.89836

**BY SAME DAY DELIVERY COURIER**

Federal Communications Commission  
International Bureau Telecommunications Division  
Post Office Box 358115  
Pittsburgh, Pennsylvania 15251-5115

Re: Application of World Connect Communications, Inc. for Global Authority  
Pursuant to Section 214 of the Communications Act of 1934, as amended,  
to Operate as an International Global Facilities-Based and Global Resale  
Authority \_\_\_\_\_

Dear Sirs or Mesdames:

We represent World Connect Communications, Inc. ("World Connect"), which requests authority pursuant to Section 214 of the Communications Act, 47 U.S.C. § 214, and Section 63.18 of the Commission's Rules, 47 U.S.C. § 63.18, for global facilities-based and global resale authority to operate as, among other things, a provider of calling card services.

On behalf of World Connect, we respectfully submit herewith for filing with the Commission one original and six (6) copies of an Application pursuant to Section 214 and the Commission's Rules. In addition, World Connect requests streamlined treatment of this Application pursuant to 47 C.F.R. § 63.12. A completed FCC Form 159 ("Remittance Advice") is also enclosed.

On behalf of World Connect, there is also enclosed with this letter a check made payable to the order of the Commission in the amount of Seven Hundred Eighty

PAUL, HASTINGS, JANOFSKY & WALKER LLP

Federal Communications Commission  
March 11, 1999  
Page 2

Dollars and No Cents (\$780.00). The check constitutes payment in full of the processing fee for the Application herewith submitted for filing.

Please date stamp the extra copy of this application as having been received by the Commission's application processing fee payment facility at the Mellon Bank in Pittsburgh, Pennsylvania as of the date of such receipt, and return the date-stamped "File Copy" of this letter to our messenger.

In the event that the Commission or its staff should have any questions concerning the Application herewith submitted for filing, kindly refer them to World Connect's undersigned counsel.

Very truly yours,



Michelle W. Cohen  
for PAUL, HASTINGS, JANOFSKY & WALKER LLP

Enclosures

cc: William Zimmerling, Esq.

PAUL, HASTINGS,

2273

JANOFSKY & WALKER LLP

1299 Pennsylvania Avenue, N.W. • Washington, DC 20004 • 202-508-9500  
Operating Account

DATE March 9, 1999

15-52/540

PAY TO THE ORDER OF Federal Communications Commission, International Bureau, Telecom. \$ 780.00

Seven hundred eighty and 00/100-----

DOLLARS

**CRESTAR**  
Crestar Bank  
Washington, DC

*Marian D. Jones*

⑆00002273⑆ ⑆054000522⑆ 208641958⑆

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WASHINGTON OFFICE

DETACH AND RETAIN THIS STATEMENT  
FOR YOUR RECORDS. IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DELUXE - FORM DVCP-3 V-2

DATE	DESCRIPTION	AMOUNT
3/9/99	Federal Communications Commission, International Bureau, Telecom FCC Section 214 Authority 29874.89836/Michelle Cohen	Check #2273 \$780.00

READ INSTRUCTIONS CAREFULLY  
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION

REMITTANCE ADVICE

APPROVED BY OMB 3060-0589

(1) LOCKBOX # 358115

PAGE NO 1 OF 1

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)  
Paul, Hastings, Janofsky & Walker LLP

(3) TOTAL AMOUNT PAID (dollars and cents)  
\$ 780.00

(4) STREET ADDRESS LINE NO. 1  
Attention: Michelle W. Cohen, Esq.

(5) STREET ADDRESS LINE NO. 2  
1299 Pennsylvania Avenue, N.W., Tenth Floor

(6) CITY Washington (7) STATE DC (8) ZIP CODE 20004

(9) DAYTIME TELEPHONE NUMBER (include area code) (10) COUNTRY CODE (if not in U.S.A.)  
(202) 508-9530

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)  
World Connect Communications, Inc.

(12) STREET ADDRESS LINE NO. 1  
3025 South Parker Road

(13) STREET ADDRESS LINE NO. 2 Suite 711 (14) CITY Aurora (15) STATE CO (16) ZIP CODE 80014

(17) DAYTIME TELEPHONE NUMBER (include area code) (18) COUNTRY CODE (if not in U.S.A.)  
(303) 369-5100

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

(19B) FCC CALL SIGN/OTHER ID (20B) PAYMENT TYPE CODE (PTC) (21B) QUANTITY (22B) FEE DUE FOR (PTC) IN BLOCK 20B  
\$ FCC USE ONLY

(19C) FCC CALL SIGN/OTHER ID (20C) PAYMENT TYPE CODE (PTC) (21C) QUANTITY (22C) FEE DUE FOR (PTC) IN BLOCK 20C  
\$ FCC USE ONLY

(19D) FCC CALL SIGN/OTHER ID (20D) PAYMENT TYPE CODE (PTC) (21D) QUANTITY (22D) FEE DUE FOR (PTC) IN BLOCK 20D  
\$ FCC USE ONLY

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

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

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

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

SECTION D - TAXPAYER INFORMATION (REQUIRED)

(23) PAYER TIN 0952209675 (23) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-11 IS DIFFERENT FROM PAYER NAME IN A-2) APPLICANT TIN 0061538993

SECTION E - CERTIFICATION

(27) CERTIFICATION STATEMENT (PRINT NAME)  
I, Michelle W. Cohen, 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 Michelle W. Cohen

SECTION F - CREDIT CARD PAYMENT INFORMATION

(23) MASTERCARD/VISA ACCOUNT NUMBER: EXPIRATION DATE: MONTH YEAR

MASTERCARD VISA AUTHORIZED SIGNATURE DATE

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

SEE PUBLIC BURDEN ESTIMATE ON REVERSE

FCC FORM 159 JULY 1997 (REVISED)



**Section 63.18 Information**

In support of World Connect's application, it submits the following information pursuant to Section 63.18 of the Commission's Rules:

(a) Name, address and telephone number of Applicant:  
World Connect Communications, Inc.  
3025 South Parker Road, Suite 711  
Aurora, CO 80014  
(303) 369-5100

(b) World Connect is a corporation organized under the laws of Delaware.

(c) Correspondence concerning this application should be sent to:  
World Connect Communications, Inc.  
3025 South Parker Road, Suite 711  
Aurora, CO 80014  
Attention: William H. Zimmerling  
(303) 369-5100

with a copy to:

Paul, Hastings, Janofsky & Walker LLP  
1299 Pennsylvania Avenue, NW  
10th Floor  
Washington, D.C. 20004  
Attention: Michelle W. Cohen, Esq.  
(202) 508-9530

(d) World Connect has not previously applied for nor been granted authority under Section 214 of the Communications Act.

(e) World Connect is requesting global Section 214 authority to operate as a facilities-based carrier pursuant to the terms and conditions of Section 63.18(e)(1) of the Commission's Rules. World Connect is also requesting global Section 214 authority to operate as a resale carrier pursuant to the terms and conditions of Section 63.18(e)(2) of the Commission's Rules.

(f) As set forth above, applicant is applying for global authority under

Sections 63.18(e)(1) and 63.18(e)(2) of the Commission's Rules. At this time, World Connect seeks no other authorization available under Section 63.18(e).

(g) Not applicable.

(h)(1) By this certification, World Connect certifies that it is affiliated with the following "start-up" non-dominant foreign carriers: Voice & Data Communications (Hong Kong) Ltd., which holds a certificate granted by the Commission in ITC 98-601. Voice & Data Communications (Hong Kong) Ltd. is a start-up carrier in Hong Kong and does not expect to exercise market power. As such, Voice & Data Communications (Hong Kong) Ltd. lacks sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market. Hong Kong is a member of the WTO and has agreed to open its telecommunications markets to competition. In addition, an affiliate of the Applicant, Masatepe Communications, U.S.A., L.L.C. ("Masatepe"), filed a notification of an affiliation with a foreign entity (but not a foreign carrier) pursuant to Section 63.11 of the Commission's rules. Masatepe holds a greater than 25% interest in Masatepe Communications S.A., which acts as a gateway for inbound satellite traffic in Nicaragua. Nicaragua is a member of the WTO. Masatepe was granted authority under Section 214 by the Commission in ITC 98-209.

(h)(2) The name, address, citizenship, and principal businesses of ten percent or greater direct and indirect shareholders or other equity holders and any interlocking directorates of World Connect are as follows:

Name:	VDC Telecommunications, Inc. (100% Owner)
Address:	75 Holly Hill Lane Greenwich, CT 06830
Citizenship:	Delaware corporation
Principal Business:	Telecommunications



The name, address, citizenship, and principal businesses of ten percent or greater direct and indirect shareholders or other equity holders in VDC Telecommunications, Inc. are:  
Name: VDC Communications, Inc. (100% Owner)

Address: 75 Holly Hill Lane  
Greenwich, CT 06830

Citizenship: Delaware Corporation

Principal Business: Telecommunications

(h)(3) By this certification, World Connect certifies that it is affiliated, as defined in 47 C.F.R. § 63.18(h)(1)(i), with the following United States carriers whose services World Connect might resell. Specifically, World Connect might resell the services of affiliate VDC Telecommunications, Inc., (formerly “Blue Sky Telecommunications, Inc.”), and of Masatepe and Voice & Data (Hong Kong) Ltd.

(h)(4) World Connect will comply with the Section 63.18(h)(4) obligation for the continuing accuracy of paragraphs (h)(1) - (3) of Section 63.18.

(h)(5) The Applicant’s foreign carrier affiliations are as follows: (i) Voice & Data Communications (Hong Kong) Ltd., which holds a certificate granted by the Commission in ITC 98-601. Voice & Data Communications (Hong Kong) Ltd. is a start-up carrier in Hong Kong and does not expect to exercise market power. As such, Voice & Data Communications (Hong Kong) Ltd. lacks sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market. Hong Kong is a member of the WTO and has agreed to open its telecommunications markets to competition. In addition, an affiliate of the transferee, Masatepe Communications, U.S.A., L.L.C. (“Masatepe”) filed a notification of an affiliation with a foreign entity (but not a foreign carrier) pursuant to Section 63.11 of the Commission’s rules. Masatepe holds a greater than 25% interest in Masatepe Communications S.A., which acts as a

gateway for inbound satellite traffic in Nicaragua. Nicaragua is a member of the WTO. Masatepe was granted authority under Section 214 by the Commission in ITC 98-209.

(h)(6) See (h)(5) above.

(h)(7) Not applicable.

(h)(8) World Connect seeks to be classified as non-dominant on all routes, as it is not affiliated with any dominant foreign carriers.

(i) Pursuant to Section 63.18(i), World Connect certifies that it has not agreed to accept special concessions (as defined in Section 63.14(b) of the Commission's Rules) 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) Pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules, this certifies that 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.

(k) The applicant qualifies for streamlined treatment of this application pursuant 47 C.F.R. § 63.12(c)(1)(i), in that the applicant qualifies for a presumption of non-dominance under 47 C.F.R. § 63.10(a)(3) because World Connect is not affiliated with a foreign carrier that is a monopoly provider of communications services and the applicant's affiliates lack sufficient market power on the foreign end of the routes to affect competition adversely in the U.S. market.

## CONCLUSION

The Commission has recognized that increased competition in international markets is beneficial and that those markets will support additional carriers. Additional market entry will promote lower prices, innovative services, increased customer choice, and efficient utilization of telecommunications resources. World Connect expects to support these goals through the provision of high-quality, competitive international communications services. A grant of World Connect's application, therefore, will serve the public interest, convenience and necessity.

Respectfully submitted,

World Connect Communications, Inc.

By:   
William H. Zimmerling  
Title: Chairman and CEO

Dated: March 5, 1999

LAW OFFICES OF  
**PAUL HASTINGS, JANOPSKY & WALKER LLP**

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March 31, 1999

WRITER'S DIRECT ACCESS

OUR FILE NO.

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28974.89836

rwcohen@phjw.com

**VIA MESSENGER AND FACSIMILE**

Ms. Fran Eisenstein  
 Federal Communications Commission  
 International Bureau  
 2000 M Street  
 8<sup>th</sup> Floor  
 Washington, D.C. 20054

Re: **Request of World Connect Communications, Inc. for Global Authority Pursuant to Section 214 of the Communications Act of 1934, as amended, to Operate as an International Global Facilities-Based and Global Resale Carrier: Supplemental Clarifying Information**

Dear Ms Eisenstein:

Pursuant to your request, World Connect Communications, Inc. ("World Connect"), by its undersigned counsel, submits this letter to clarify certain information pertaining to World Connect's above-referenced application for authority pursuant to Section 214 of the Communications Act, as amended.

Specifically, with regard to World Connect's response to information required by § 63.18(h)(2), the name, address, citizenship and principal business of the shareholders that control ten (10) percent or more of VDC Communications, Inc., a parent company of the applicant, are as follows:

PAUL, HASTINGS, JANOFSKY & WALKER LLP

Ms. Fran Eisenstein  
Federal Communications Commission  
March 31, 1999  
Page 2

Name: Frederick A. Moran  
Address: 75 Holly Hill Lane  
Greenwich, CT 06830  
Citizenship: U.S.A.  
Principal Business: Telecommunications  
Name: PortaCom Wireless, Inc.  
Address: 10061 Talbert Avenue  
Suite 200  
Fountain Valley, CA 92708  
Citizenship: Delaware corporation  
Principal Business: Telecommunications

Please feel free to contact me should you have any questions concerning the foregoing.

Respectfully submitted,  


Michelle W. Cohen  
for PAUL, HASTINGS, JANOFSKY & WALKER LLP  
Counsel for World Connect Communications, Inc.

cc: Troy Tanner, Esq. (via facsimile)