

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: _____

FBI

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March 11, 1999

VIA BERRY BEST COURIER

Federal Communications Commission
International Bureau - Telecommunications
P.O. Box 358115
Pittsburgh, PA 15251-1511

Re: H.K. 1618 Comm Ltd.

Application for Authority Under Section 214
of the Communications Act of 1934, as Amended

Dear Sirs:

On behalf of H.K. 1618 Comm Ltd. ("HK"), we hereby submit its application, pursuant to Section 214 of the Communications Act of 1934, as amended, for global authority to resell the international services of U.S. common carriers for the provision of international services between the United States and all permissible foreign points.

A check in the amount of \$780.00 is attached to cover the required filing fee.

Please direct all questions and correspondence regarding this filing to the undersigned counsel.

Very truly yours,



Laura B. Sherman
Attorney for H.K. 1618 Comm Ltd.

Attachment

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

In the Matter of)
)
H.K.1618 Comm Ltd.)

File No. I-T-C-__-__

Application pursuant to Section 214 of the)
Communications Act of 1934, as amended, for)
global authority to resell the international services)
of U.S. common carriers for the provision of)
international services between the United)
States and all permissible foreign points)

APPLICATION

H.K.1618 Comm Ltd. (hereinafter referred to as "HK 1618") hereby applies for authority, pursuant to Section 214 of the Communications Act of 1934, as amended, and Section 63.18(e)(2) of the Commission's Rules and Regulations (the "Rules"), to resell the international services of authorized U.S. common carriers -- including, consistent with the Commission's Report and Order and Order on Reconsideration in Rules and Policies on Foreign Participation in the U.S. Telecommunications Market,^{1/} the resale of private line services for the provision of international basic switched services to certain countries -- to all international points. Under Section 63.12 of the Rules, this application is subject to the Commission's streamlined processing rules as HK1618 is a non-dominant carrier, pursuant to Section 63.10 of the Rules, and is not otherwise affiliated with a foreign carrier.

^{1/} FCC 97-398, released November 26, 1997 (the "Foreign Participation Order").

In accordance with Section 63.18(e)(2) of the Rules, HK1618 submits the following information in support of its application:

- (a) The applicant is H.K. 1618 Comm Ltd. The address of the Company's registered office is: Room 3202, East Tower, Shun Tak Centre, 168-200 Connaught Road Central, Hong Kong. The phone number at that address is (852) 2110-1618.

(b) HK1618 is a Hong Kong corporation.

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

Flora Cheng, Director
H.K. 1618 Comm Ltd.
Room 3202, East Tower
Shun Tak Centre
168-200 Connaught Road, Central
Hong Kong
(852) 2110-3611

With a copy to:

Laura B. Sherman, Esq.
Paul, Weiss, Rifkind, Wharton & Garrison
1615 L Street, N.W., Suite 1300
Washington, D.C. 20036
(202) 223-7300

- (d) HK1618 has not previously received any authorization under Section 214 to provide service in the United States.
- (e) HK1618 hereby requests Section 214 authority pursuant to the terms and conditions of Sections 63.18(e)(2) and 63.21 of the Rules, as well as to any and all other provisions of the Rules applicable hereto, to resell international services, between the United States and all permissible points -- including, consistent with the Foreign Participation Order, the resale of private line

services for the provision of international basic switched services to certain countries.

The authorization sought in this application will be used to provide a full range of telecommunications services, including switched voice and data, private line and business services, between the United States and all permissible foreign points.

- (f) HK1618 hereby certifies, under penalty of perjury, that it has no affiliation with any foreign carrier. The following owns and controls more than 10 percent of the equity of HKNet, through holding companies incorporated in the British Virgin Islands and Cayman Islands:

Mak Shiu Tong
Chairman, CCT Telecom Holdings Limited
3201 East Tower
Shun Tak Centre
168-200 Connaught Road Central
Hong Kong

Nationality: U.K. ✓
Principal Business: Telecommunications service provider; manufacture and sale of telecommunications consumer products; brokerage services and investment banking

HK1618 certifies that it has no affiliation with any United States carrier whose facilities-based services it proposes to resell. No member of HKNet's board of directors sits on the board of any other unaffiliated telecommunications company.

- (g) HK1618 hereby certifies, under penalty of perjury, that it has not agreed to accept -- nor will it agree 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 that HK1618 may serve under the authority granted pursuant to Part 47 of the Rules.

- (h) Pursuant to Sections 1.2001 through 1.2003 of the Rules, HK1618 certifies that no party to this application is subject to a denial of Federal benefits that includes FCC benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

As demonstrated herein, HK1618 is legally and technically qualified to provide the services for which it requests authority. The grant of this application will serve the public interest by promoting increased competition in the international telecommunications marketplace.

21100238

FROM :

PHONE NO. : 21100238

Mar. 10 1999 05:42PM P4

*original sent out on
10/3/99 by DML*

By this application, H.K. 1618 respectfully requests that the Commission grant it authority to resell the international services of authorized U.S. common carriers -- including, consistent with the Foreign Participation Order, the resale of private line services for the provision of international basic switched services to certain countries -- to all international points.

Respectfully submitted,

H.K. 1618 Comm Ltd.

By:  _____

Date: March 10, 1999

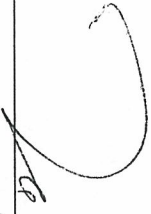
Of Counsel

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Telephone: 202-223-7300

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Respectfully submitted,

H.K. 1618 Comm Ltd.

By:  _____

Date: March 10, 1999

Of Counsel

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