

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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March 16, 1999

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**ERIC FISHMAN**  
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## VIA R&S COURIER

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

Re: Section 214 Application of Edge Communications, Inc.

Dear Sir or Madam:

Transmitted herewith in triplicate on behalf of Edge Communications, 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 Edge Communications, Inc.

efj;ewd

Enclosure

SECURITY FEATURES INCLUDED. DETAILS ON BACK.

⑈003737⑈ ⑆052001533⑆ 39331823⑈

AUTHORIZED SIGNATURE

MP

TO THE  
ORDER  
OF:

Federal Communications Commissi

PAY Seven Hundred Eighty and 0/100 Dollars

Memo: FCC 214 Lincense

Mar 11, 1999 \*\*\*\*\*\$780.00\*

AMOUNT

DATE

EDGE COMMUNICATIONS INC.  
P.O. BOX 5533  
ROCKVILLE, MD 20855  
PH (301) 527-1600

NATIONSBANK, N.A.  
MARYLAND  
7-163/520

3737





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

Edge is a corporation organized under the laws of the State of Maryland for the purpose of providing telecommunications services. Its sole shareholder is DCI Telecommunications, Inc., a publicly traded corporation organized under the laws of the State of Colorado.

Edge 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).

Edge 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.<sup>1</sup> 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, Edge 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.

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<sup>1</sup> 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.

Edge 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 Edge'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:  
Edge Communications, Inc.  
19225 Orbit Drive  
Gaithersburg, MD 20879  
Attention: Donnie Gross, President  
Telephone No.: (301) 527-1600

(b) Applicant is a corporation organized under the laws of the State of Maryland.

(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:  
Donnie Gross, President  
Edge Communications, Inc.  
19225 Orbit Drive  
Gaithersburg, MD 20879  
(301) 527-1600



- (d) Applicant has not previously received authority under Section 214 of the Communications Act, as amended. By grant of this Application, Edge would become a nondominant international carrier for the provision of interexchange service, subject to Section 214 of the Act.
- (e) Edge 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 Edge's telecommunications services from the United States to international points which Edge 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 Edge 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, Edge is legally, financially and technically qualified to provide the service for which it requests authority. For the reasons stated above, Edge 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 Edge 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:

The sole shareholder of Edge Communications is DCI Telecommunications, Inc., a publicly traded corporation organized under the laws of the State of Colorado. The majority shareholders of DCI Telecommunications, holding a greater than 10% interest in that company's stock, 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 which is certificated as a telecommunications common carrier under Section 214 of the Act. An application by DCI Telecommunications, for separate authority to operate as a telecommunications common carrier under Section 214 of the Act, is currently pending before the Commission. Public Notice, Report No. TEL-00071S, released March 5, 1999 (File No. ITC-214-19990216-00086).

According to its SEC filings, 10% or greater ownership interests in IXC are held by: Trustees of General Electric Pension Trust (26.6%) and all directors and officers of IXC Communications as a group (15 persons) (21.6%).

The officers and directors of Edge are Donnie Gross (President, Director) and Stephen Gross (Vice President, Director), and Lansing Freeman (Director), all of whom are U.S. citizens.

Interlocking Directorates. Edge has no interlocking directorates.

Foreign Affiliations. Edge is a wholly-owned subsidiary of DCI Telecommunications, Inc. which, in turn, is also 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. Edge hereby certifies that none of the above-described affiliated foreign carriers has the ability to discriminate against unaffiliated U.S. international carriers through control of bottleneck services or facilities in the named foreign countries. Edge 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.



Edge 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:

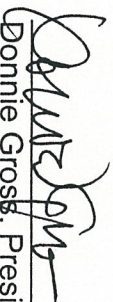


Donnie Gross, President  
Edge Communications, Inc.  
19225 Orbit Drive  
Gaithersburg, MD 20879  
(301) 527-1600

CERTIFICATION

Pursuant to Section 1.2002 of the Commission's rules, Edge Communications, 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:



Donnie Gross, President  
Edge Communications, Inc.  
19225 Orbit Drive  
Gaithersburg, MD 20879  
(301) 527-1600



DECLARATION

I, Donnie Gross, am President of Edge Communications, 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:



Donnie Gross, President  
Edge Communications, Inc.  
19225 Orbit Drive  
Gaithersburg, MD 20879  
(301) 527-1600

*March 10*  
~~January~~ \_\_, 1999