

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: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

PB1



**DOW, LOHNES & ALBERTSON, PLLC**  
ATTORNEYS AT LAW

**COPY**

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FACSIMILE 770.901.8874

WASHINGTON, D.C.

March 23, 1999

PCC/MILLON

MAR 23 1999

**VIA COURIER**

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

**Re: IMC Telecom U.S.A., Inc. Application for Section 214 Authority to**  
**Provide International Resale Service**

Ladies and Gentlemen:

On behalf of International Multimedia Communications Telecom U.S.A., Inc. ("IMC"), we hereby submit the attached request for authority, pursuant to Section 214 of the Communications Act, as amended, to resell the international telecommunications services of other common carriers between the United States and various international points.

A check in the amount of seven hundred and eighty dollars (\$780.00) is enclosed in payment of the filing fee. In accordance with Section 63.20 of the Commission's rules, 47 C.F.R. § 63.20, an original and five copies of the attached application are being filed herewith.

If you should have any questions regarding this matter, please do not hesitate to contact the undersigned.

Respectfully submitted,



Laura H. Phillips  
Counsel for IMC Telecom U.S.A., Inc.

Enclosures

READ INSTRUCTIONS CAREFULLY  
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION

APPROVED BY OMB 3060-0589

REMITTANCE ADVICE

SPECIAL USE

FCC USE ONLY

PAGE NO. 1 OF 1

(1) LOCKBOX # 358115

SECTION A - PAYER INFORMATION

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card)  
Dow Jones & Albertson, PLLC

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

(4) STREET ADDRESS LINE NO. 1  
c/o Laura H. Phillips, Esq., DL&A

(5) STREET ADDRESS LINE NO. 2  
1200 New Hampshire Ave., N.W.

(6) CITY  
Washington

(7) STATE  
DC

(8) ZIP CODE  
20036

(9) DAYTIME TELEPHONE NUMBER (include area code)  
(202) 776-2824

(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)  
International Multimedia Communications Telecom U.S.A., Inc.

(12) STREET ADDRESS LINE NO. 1  
c/o Y. Peter Kim, Esquire

(13) STREET ADDRESS LINE NO. 2  
300 S. Grand Ave., 22nd Fl.

(14) CITY  
Los Angeles

(15) STATE  
CA

(16) ZIP CODE  
90071-3132

(17) DAYTIME TELEPHONE NUMBER (include area code)  
(213) 612-2661

(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

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 5 3 0 1 8 6 7 7 4

(26) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-11 IS DIFFERENT FROM PAYER NAME IN A-2  
APPLICANT TIN 0 9 5 4 7 2 9 8 5 5

SECTION E - CERTIFICATION

(27) CERTIFICATION STATEMENT  
I, David Martin, 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 David A. Martin

SECTION F - CREDIT CARD PAYMENT INFORMATION

(28) MASTERCARD/VISA ACCOUNT NUMBER:

EXPIRATION DATE:

MASTERCARD

Grid for MASTERCARD/VISA ACCOUNT NUMBER

Grid for EXPIRATION DATE

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)



Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

International Multimedia Communications )  
Telecom U.S.A., Inc. )  
Application for Authorization )  
Pursuant to Section 214 of )  
the Communications Act for )  
Global Authority to Operate as )  
a Resale Carrier )

File

APPLICATION OF  
INTERNATIONAL MULTIMEDIA COMMUNICATIONS TELECOM U.S.A.

International Multimedia Communications Telecom U.S.A., Inc. ("IMC") hereby requests authority to operate as a resale carrier between the United States and international points, pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, and Section 63.18(e)(2) of the Commission's Rules, 47 C.F.R. § 63.18(e)(2). The application is filed under Section 68.18(e)(2) of the Commission's Rules and is subject to streamlined processing pursuant to Section 63.12 of the Rules. IMC provides the following information in support of its request for global international resale authorization:

1. **The applicant's name, address and telephone number - Section 63.18(a)**

International Multimedia Communications Telecom U.S.A., Inc.  
c/o Y. Peter Kim, Esquire  
300 S. Grand Avenue, 22nd Fl.  
Los Angeles, CA 90071-3132  
Telephone: (213) 612-2661

2. **The Government, State, Territory under the laws of which the applicant is organized - Section 63.18(b)**

IMC is a United States corporation, incorporated in the State of California.

3. **The name, title, address and telephone number of the officer and contact point, such as legal counsel, to whom correspondence regarding the application is to be addressed - Section 63.18(c)**

Y.C. Song, Esquire  
Director IMC Telecom U.S.A.  
2nd Floor, Namdo Bldg.  
10-8, Dongbinggo-Dong, Yongsan-Gu  
Seoul 140-230  
KOREA

Telephone: 82-2-792-1232

Other contact point to whom correspondence should be addressed:

Y. Peter Kim, Esquire  
Morgan, Lewis & Bockius, LLP  
300 S. Grand Avenue, 22nd Fl.  
Los Angeles, CA 90071-3132  
Telephone: (213) 612-2661

4. **Previous authorizations - Section 63.18(d)**

IMC has not sought or received any previous authorization to provide international telecommunications services pursuant to Section 214.

5. **Statements - Section 63.18(e) and (g)**

IMC is applying for authorization to resell the international services of authorized U.S. common carriers for the provision of international basic switched and private line services to all international points subject to the terms and conditions of Section 63.18(E)(2) of the Commission's Rules.

The statement under Section 63.18(g) is not required with respect to this present application.

6. **Other authorizations sought - Section 63.18(f)**

At this time, IMC seeks no other authorization available under Section 63.18(e).

7. **Affiliation with foreign carriers - Section 63.18(h)(1) and (2)**

IMC certifies that it is not affiliated with any foreign carrier.

In support of this certification, the name, address, citizenship and principal business of the sole shareholder who controls IMC is provided herewith:

Y.C. Song, Esquire

Director

IMC Telecom U.S.A., Inc.

2nd Floor, Namdo Bldg.

10-8, Dongbinggo-Dong, Yongsan-Gu

Seoul 140-230

KOREA

principal businesses: magazine publishing and insurance  
citizenship: Korean

8. **Affiliation with U.S. carriers - Section 63.18(h)(3)**

IMC certifies that it is not affiliated with any U.S. facilities-based carrier whose services it proposes to resell.

9. **Non-dominant regulation - Section 63.10(a)(1)**

Pursuant to Section 63.10(a)(1), IMC is presumptively entitled to non-dominant regulation because (a) the resale of the service of unaffiliated U.S. carriers is entitled to non-dominant regulation under Section 63.10(a)(4) and (b) IMC is neither a foreign carrier nor affiliated with a foreign carrier in any country to which it will provide service under the authorization requested in this application.

10. **Special concessions - Section 63.18(i)**

IMC certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to traffic or revenue flows between the United States and any foreign country and IMC will not enter into such agreements in the future, except as permitted by Section 63.14 of the Commission's Rules, where such foreign carrier does not possess market power sufficient to affect competition adversely in the U.S. market.

11. **Anti-Drug Abuse Act - Section 63.18(j)**

IMC certifies that it is not subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

12. **Streamlined processing - Section 63.18(k)**

The application is subject to streamlined processing pursuant to Section 63.12 of the Commission's Rules because (i) IMC is not affiliated with a foreign carrier in any destination market for which authority is requested in this application, (ii) IMC is not affiliated with a dominant U.S. carrier whose international switched or private line services it intends to resell and (iii) IMC does not seek authority to provide switched basic services over private lines to a country for which the Commission has not authorized yet the provision of such services.

The provision of telecommunications services by IMC would increase competition in the international market place and benefit U.S. ratepayers. Accordingly, the grant of this application would serve the public interest, convenience and necessity.

Respectfully submitted,



Laura H. Phillips  
Counsel for IMC Telecom U.S.A., Inc.

Dow, Lohnes & Albertson, PLLC  
1200 New Hampshire Avenue, N.W.  
Washington, D.C. 20036  
(202) 776-2000

March 23, 1999

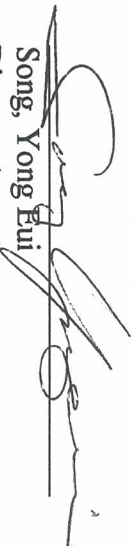


## CERTIFICATE

I, the undersigned, hereby certify that International Multimedia & Communications Telecom U.S.A., Inc. ("IMC") or its affiliates:

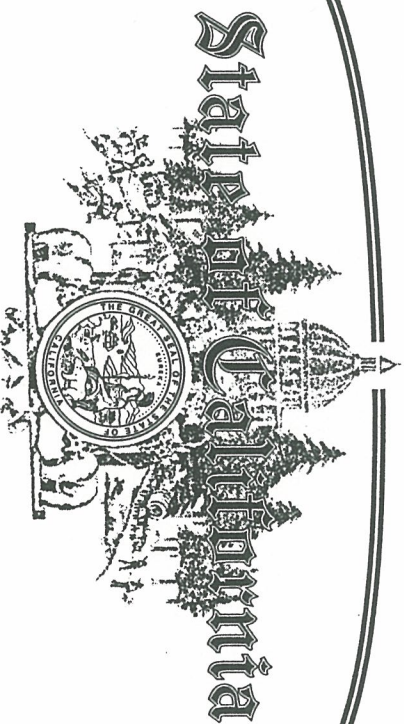
- (i) has not sought or received any previous authorizations pursuant to Section 214 of the Communication Act;
- (ii) is not affiliated with any U.S. or foreign carrier;
- (iii) has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to traffic or revenue flows between the United States and any foreign country and will not enter into such agreement in the future; and
- (iv) is not subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. & 862.

March 6, 1999



Song, Yong Eui  
Director /President  
IMC Telecom U.S.A., Inc.





**SECRETARY OF STATE**

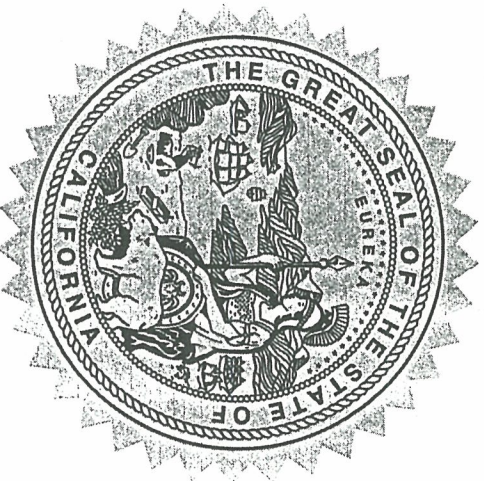
I, **BILL JONES**, Secretary of State of the State of California, hereby certify:

That the attached transcript of 2 page(s) has been compared with the record on file in this office, of which it purports to be a copy, and that it is full, true and correct.

**IN WITNESS WHEREOF**, I execute this certificate and affix the Great Seal of the State of California this day of

JAN 29 1999

Secretary of State



2131993

ENDORSED  
FILED

In the office of the Secretary of State  
of the State of California

ARTICLES OF INCORPORATION  
OF  
IMC TELECOM U.S.A., INC.

JAN 27 1999

*Richard Jones*  
Richard Jones  
Secretary of State

I.

The name of this corporation (the "Corporation") is IMC Telecom  
U.S.A., Inc.

II.

The purpose of the Corporation is to engage in any lawful act or activity  
for which a corporation may be organized under the General Corporation Law of  
California other than the banking business, the trust company business or the  
practice of a profession permitted to be incorporated by the California Corporations  
Code.

III.

The name in the State of California of the Corporation's initial agent for  
service of process is: Y. Peter Kim, c/o Morgan, Lewis & Bockius LLP, 300 South  
Grand Avenue, 22nd Fl., Los Angeles, CA 90071-3132.

IV.

The Corporation is authorized to issue only one class of shares of stock;  
and the total number of shares which this corporation is authorized to issue is  
1,000,000.

V.

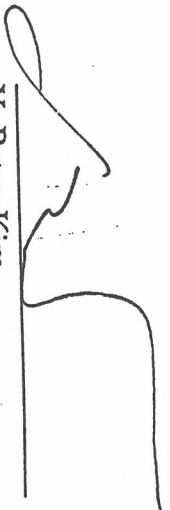
(a) The liability of directors of the Corporation for monetary  
damages shall be eliminated to the fullest extent permissible under California law.



(b) The Corporation is authorized to provide indemnification of agents (as defined in Section 317 of the California Corporations Code) through Bylaw provisions, agreements with agents, vote of shareholders or disinterested directors, or otherwise, to the fullest extent permissible under California law.

(c) Any amendment, repeal or modification of any provision of this Article V shall not adversely affect any right or protection of an agent of the Corporation existing at the time of such amendment, repeal or modification.

DATED: January 26, 1999



Y. Peter Kim  
Sole Incorporator



**DOW, LOHNES AND ALBERTSON**  
A PROFESSIONAL LIMITED LIABILITY COMPANY  
1200 NEW HAMPSHIRE AVE., N.W., SUITE 800  
WASHINGTON, D.C. 20036  
(202) 776-2000

FIRST UNION NATIONAL BANK  
WASHINGTON, D.C. 20036  
15-122  
00480

81474

March 18, 1999

PAY SEVEN HUNDRED EIGHTY AND 00/100

DOLLARS \$ 780.00

TO THE ORDER OF

Federal Communications Commission

⑈081474⑈ ⑆05400122012066700434109⑈

VOID AFTER 6 MONTHS  
TWO SIGNATURES REQUIRED FOR AMOUNTS OVER \$5,000.00

81474

**DOW, LOHNES AND ALBERTSON**  
A PROFESSIONAL LIMITED LIABILITY COMPANY  
1200 NEW HAMPSHIRE AVE., N.W., SUITE 800  
WASHINGTON, D.C. 20036  
(202) 776-2000

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.

Invoice Date	Invoice Number	Description	Vendor #	#	Amount
3/18/99	CRDLM3031899	Filing fee for Section 214 application	2094		780.00