

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: _____

FR 1.?? -
Please see history. Yes

READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE

APPROVED BY OMB 3060-0589
COPY

(1) LOCKBOX # 358115

PAGE NO. 1 OF 1
EXPIRES **MAR 29 1999**

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)
RSL Communications, Latin America, Ltd.

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

(4) STREET ADDRESS LINE NO. 1
6300 N.W. 5th Way

(5) STREET ADDRESS LINE NO. 2
Suite 100

(6) CITY
Ft. Lauderdale

(7) STATE
FL

(8) ZIP CODE
33309

(9) DAYTIME TELEPHONE NUMBER (include area code)
(954) 229-0572

(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
C U T

(20A) PAYMENT TYPE CODE (PTC)

(21A) QUANTITY

(22A) FEE DUE FOR (PTC) IN BLOCK 20A
1 \$ 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 2 2 0 9 9 2 8 6

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

SECTION E - CERTIFICATION

(27) CERTIFICATION STATEMENT
I, Eric Fishman

, Certify under penalty of perjury that the foregoing and supporting information

(PRINT NAME)

SIGNATURE

Eric Fishman

are true and correct to the best of my knowledge, information and belief.

SECTION F - CREDIT CARD PAYMENT INFORMATION

(28) MASTERCARD/VISA ACCOUNT NUMBER:

EXPIRATION DATE:

MONTH YEAR

DATE

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

AUTHORIZED SIGNATURE

SEE PUBLIC BURDEN ESTIMATE ON REVERSE

FCC FORM 159 JULY 1997 (REVISED)

Law Offices

HOLLAND & KNIGHT LLP

2100 Pennsylvania Avenue, N.W.
Suite 400
Washington, D. C. 20037-3202

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March 29, 1999

Atlanta	New York
Boca Raton	Northern Virginia
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Melbourne	Tallahassee
Mexico City	Tampa
Miami	West Palm Beach

ERIC FISHMAN
202-828-1949

Internet Address:
efishman@hklaw.com

VIA HAND DELIVERY

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

Re: Section 214 Application
RSL Communications, Latin America, Ltd.

Dear Sir/Madam:

Transmitted herewith, on behalf of RSL Communications, Latin America, Ltd., are an original and five (5) copies of its Section 214 application to operate as a facilities-based carrier and as a resale carrier. A check in the amount of \$780.00 is enclosed to cover the filing fee.

An extra copy of the application is enclosed. Please date-stamp the extra copy and return it to the courier for return to me.

Please direct any correspondence regarding this application to the undersigned counsel.

Very truly yours,

HOLLAND & KNIGHT LLP



Eric Fishman
Counsel for
RSL Communications, Latin America, Ltd.

Enclosure

R S L COMMUNICATIONS, LATIN AMERICA LTD. 6300 N W 5th Way, Ste 100 Ft Lauderdale, FL 33309 Ph 954-491-9500		1136
DATE: Feb 12, 99 BRANCH 00648 63-643/670		1136
PAY TO THE ORDER OF Federal Communications Commission <i>Seven Hundred Eighty and no/100</i>		DOLLARS <input type="checkbox"/> Security features included <input type="checkbox"/> Details on back
FIRST UNION First Union National Bank Fort Lauderdale, Florida R/T 067006432		FLEXIBLE BUSINESS BANKING
FOR 214 Rivera Application PIN # 52-2099284 0570064321: 209000 2923 10511: 1136		Roberto Alencar

countries.

RSL Latin America is a corporation organized under the laws of the Bermuda for the purpose of providing telecommunications services. The sole shareholders of RSL Latin America are RSL Communications, Ltd. ("RSL Communications"), a Bermuda corporation holding 51% of its capital stock, and Coral Gate Investments, Ltd., a British Virgin Islands company, which owns 49% of its capital stock. The company currently holds no telecommunications authorizations.

RSL Latin America 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).

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RSL Latin America 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.¹ 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, RSL Latin America 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; *AT&T Corp. et al.*, DA 98-2654, released January 4, 1999.

¹ 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.

RSL Latin America 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 RSL Latin America'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:

RSL Communications, Latin America, Ltd.
6300 N.W. Fifth Way, Suite 100
Fort Lauderdale, Florida 33309
Attention: Rodolfo Garcia, President and CEO
Telephone No.: (954) 491-9500

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

(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:

Rodolfo Garcia, President and CEO
RSL Communications, Latin America, Ltd.
6300 N.W. Fifth Way, Suite 100
Fort Lauderdale, Florida 33309
Telephone No.: (954) 491-9500

(d) Applicant has not previously received authority under Section 214 of the Communications Act, as amended. By grant of this Application, RSL Latin

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America would become a nondominant international carrier for the provision of interexchange service, subject to Section 214 of the Act.

- (e) RSL Latin America 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 RSL Latin America's telecommunications services from the United States to international points which RSL Latin America 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 RSL Latin America 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.

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- (i) See attached certification.
- (j) See attached certification.

Conclusion

As demonstrated in this Application, RSL Latin America is legally, financially and technically qualified to provide the service for which it requests authority. For the reasons stated above, RSL Latin America 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 RSL Latin America 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.

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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:

RSL Latin America was formed in 1997 as a joint venture between RSL Communications, Ltd., a Bermuda corporation, and Coral Gate Investments Ltd., a British Virgin Islands corporation, which is an affiliate of Inversiones Divitel, D.T., C.A., a Venezuelan corporation, and a member of the Cisneros Group. RSL Latin America is 51% owned by RSL Communications and 49% owned by Coral Gate. RSL Communications is a publicly held corporation (NASDAQ) whose controlling shareholders are Ronald S. Lauder, Leonard A. Lauder and Itzhak Fisher.

RSL Communications is the parent corporation of RSL Communications PLC, a corporation organized under the laws of the United Kingdom, and owns 100% of that company's capital stock. RSL Communications PLC, in turn, is the 100% shareholder of RSL COM North America, Inc. ("RSL North America," formerly known as International Telecommunications Group, Ltd.), a Delaware corporation headquartered at 767 Fifth Avenue, Suite 4200, New York, New York 10153. RSL North America, in turn, owns approximately 97% of the capital stock of RSL COM U.S.A., Inc. ("RSL USA") (formerly International Telecommunications Corporation), a Delaware corporation headquartered at 430 Park Avenue, 5th Floor, New York, New York 10022. RSL USA is a domestic

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interstate and international telecommunications provider, certified under Section 214 of the Act, and authorized to provide intrastate, interexchange service in all states except Alaska. It, in turn, is the parent corporation of RSL COM PrimeCall, Inc. (formerly Intelco, Global Information Services, Inc.) and LDM Systems, Inc., both of which provide domestic interstate and international service pursuant to Section 214 of the Act, and intrastate, interexchange service in 49 states. For purposes of this application and certification, RSL USA, RSL COM PrimeCall and LDM Systems are referred to collectively as "the RSL Subsidiaries."

The principal shareholders of RSL Communications, Ltd. are Ronald S. Lauder, Leonard A. Lauder and Itzhak Fisher, who hold direct and indirect ownership interests in the company of 32.1%, 11.7%, and 7.9%, respectively. Ronald S. Lauder, a co-founder of RSL Communications, serves as its Chairman. A former U.S. Ambassador to Austria, Mr. Ronald Lauder is a principal shareholder of The Estee Lauder Companies Inc., and is founder of Central European Media Enterprises Ltd., an owner and operator of commercial television stations and networks in Central and Eastern Europe. Leonard A. Lauder is Chief Executive Officer and Chairman of the Board of Estee Lauder. Mr. Fisher, also a co-founder of RSL Communications, has been a director, President and Chief Executive Officer of RSL Communications since its inception. Messrs. Lauder and Mr. Fisher are all U.S. citizens.

The names of the officers and directors of RSL Communications, Ltd. are attached hereto.

Coral Gate is a private corporation whose sole shareholder is Long View Finance

Ltd., a British Virgin Islands corporation. Long View's sole shareholder, in turn, is Centerville Finance Limited, a British Virgin Islands corporation. The officers and directors of Coral Gate are: Jane Melone, President; Annette Mactavious, Secretary; and Servco Limited, Director. The officers and directors of Long View Finance are: Jane Melone, President; Alfredo Martinez Tinoco, Vice President; and Servco Limited, Director. The officers and directors of Centerville Finance are: Annette Mactavious, President; Jane Melone, Secretary; Eduardo Hernandez, Assistant Secretary; and Servco Limited, Director.

The officers and directors of RSL Latin America are: Itzhak Fisher (Chairman); Steven Bandel (Vice Chairman); Cristina Pieretti (Deputy Chairman); Rodolfo Garcia (Chief Executive Officer); Nesim Bildirici (Vice President, Director); Michael B. Ashford (Secretary); Avery S. Fischer (Assistant Secretary); Jacob Schuster (Director); Sharon Burstin (Director); and Luis Avila (Director).

RSL Latin America and the RSL Subsidiaries contain the following interlocking directorates: Mark Hirschhorn (RSL USA, PrimeCall and LDM), Ed Thomas (RSL USA and PrimeCall), Nir Tarlovsky (RSL USA and PrimeCall), and Itzhak Fisher (RSL USA and PrimeCall).

RSL Latin America has the following affiliations with foreign carriers:

Asia and Pacific Rim. In Asia, RSL Communications, through its subsidiaries, operates in Australia and Japan:

Australia. RSL Australia is enrolled with the Australian Telecommunications Authority under the provisions of an International Service Providers license as a provider of services with double-ended interconnection. Double-ended interconnection allows the

company to interconnect with the Australian PSTN, to resell general carrier services, and to transmit international calls over owned international transmission facilities. The company's principal competitors in Australia are the two licensed general carriers, Telstra (the former PTT) and Optus. Each of these competitors provides a bundle of services including mobile, local and domestic and international long distance. In addition, the company faces competition from switch-based and switchless resellers.

Japan. RSL COM Japan has been granted an International Simple Resale License by Japan's Ministry of Posts and Telecommunications to provide international telephony, fax and data services to and from Japan. The Company has also received a Type II value-added network provider license and may apply for a Type I license to provide facilities-based international long distance service.

Canada. RSL COM Canada Holdings, Inc. has recently acquired Westel Telecommunications, Ltd., a Canadian facilities-based telecommunications provider, from the British Columbia Railway Company. Westel is a provider of alternative long distance voice and data telecommunications services in British Columbia; its principal competitor is BC Telecom, the dominant local access and long distance provider in British Columbia.

Europe. RSL COM Europe, Ltd. ("RSL Europe") is a wholly owned subsidiary of RSL Communications. Through its subsidiaries, RSL Europe has the following affiliations:

Austria. RSL Europe owns 90% of RSL COM Austria AG, which holds a telecommunications license from the Austria Telecom Control Gmbh. The license permits RSL COM Austria to provide a full range of telecommunications services including local calls as well as long distance and international services over RSL Communications' global

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network. RSL COM Austria's primary competitor is Post und Telecom Austria, the dominant supplier of telecommunication services in Austria. The company also competes with the local Austrian affiliates of global carriers such as British Telecom and Global One.

Belgium. RSL Europe holds a 90% interest in European Telecom S.A./N.V. and a 100% interest in RSL COM Telco Belgium S.A., which offer international long distance voice services utilizing dial-in access via autodialers and wireless services. In addition to the dial-in services it currently offers, RSL Belgium has received a license to offer international and domestic fixed wire long distance services. RSL Belgium's primary competitor is Belgacom, the former PTT and dominant supplier of telecommunications services in Belgium. The company also competes with local Belgian affiliates of global carriers such as Global One and Unisource.

Denmark. RSL Europe, through RSL Netherlands (infra) owns a 100% interest in RSL COM Denmark AS, which offers its customers international and domestic long distance services utilizing prefix dialing. The company's primary competitor is Tele Danmark, the dominant supplier of telecommunications services in Denmark. The company also competes with other carriers, including primarily Telia (the Swedish PTT), Mobilix AS (the Danish subsidiary of France Telecom) and Global One.

Finland. RSL Europe owns a 100% interest in RSL COM Finland Oy, which is a fully licensed international long distance carrier in Finland offering international and domestic long distance services. The company's primary competitor is Telecom Finland, the dominant supplier of telecommunications services in Finland. The company also competes with emerging licensed public telephone operators (who are constructing their

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own facilities-based networks), such as Finnet, Telia, Global One and Facilicom.

France. RSL Europe owns 100% of RSL COM France S.A, which was formed in 1996 for the purpose of acquiring Sprint's international voice business in France. The company recently obtained an authorization to operate a public network and to offer telephone services to the public. The company's principal competitor in France is France Telecom, the dominant supplier of telecommunications services in France, and the Modulance Partenaire International, which offers discount long distance services to the largest commercial customers. The company also faces competition from emerging licensed public telephone operators (who are constructing fiber networks in major metropolitan areas) such as AT&T and Worldcom, and from resellers.

Germany. RSL COM Deutschland GmbH ("RSL COM Germany"), a subsidiary of RSL COM Europe, has been granted a Germany-wide, Class 4 license for public switched telephony service by the federal Ministry of Post and Telecommunications (Bundes Amt fur Post und Telekommunikation-BAPT). This is the eleventh telecommunications service license issued by BAPT and permits RSL COM Germany to transmit voice traffic via its international telecommunications network. RSL COM Germany was formed in 1996 for the purpose of acquiring Sprint's international voice business in Germany. International transmission facilities are leased from Deutsche Telekom. The company has interconnect agreements with Teleglobe International Inc. for termination of its international traffic, and with TelDaFax GmbH for termination of domestic traffic. In Germany, the company competes with facilities-based carriers and resellers. Its principal competitor in Germany is Deutsche Telekom, the dominant supplier of telecommunications services in Germany.

The company also faces competition from emerging public telephone operators (who are constructing their own facilities-based networks), from resellers, and from call-back providers.

Italy. RSL Europe holds a 99.3% interest in RSL COM Italia S.r.l. ("RSL Italy"), which is authorized to provide domestic and international voice service, including dial-in access via autodialers and dedicated access lines. RSL Italy's principal competitor is Telecom Italia, the dominant supplier of telecommunications services in Italy. The company also competes with the local Italian affiliates of global carriers such as British Telecom and Global One.

Luxembourg. RSL Communications holds a 90% interest in European Telecom SARL, which offers international long distance voice services utilizing dial-in access via autodialers and wireless services. The company's principal competitor is Entreprise des Postes et des Telecommunications, Luxembourg's PTT. The company also competes with Telecom Luxembourg and Tele2 Europe.

The Netherlands. RSL Europe holds a 100% interest in RSL COM Nederland B.V. ("RSL Netherlands"), which offers international long distance services utilizing direct access, prefix dialing and dial-in access, and calling cards. The company's principal competitor in the Netherlands is PTT Telecom Netherlands, the dominant supplier of telecommunications services in the Netherlands. The company also faces competition from emerging licensed public telephone operators (who are constructing their own facilities-based networks) such as WorldCom, and from mega-carriers such as Concert and Global One.

Portugal. RSL COM Europe holds a 39% interest in Maxitel Servicos e Gestao de Telecomunicacoes, SA, which offers international and long distance services to closed user groups of companies utilizing autodialers and direct access. The company's primary competitor is Portugal Telecom, the dominant supplier of telecommunications services in Portugal. The company also competes with the local Portuguese affiliates of global carriers such as Global One, and with resellers.

Spain. RSL Europe holds a 90% interest in RSL Communications Spain, S.A., which recently received a license to provide closed-user group services in Spain. Only Telefonica de Espana and Retevision are licensed to provide international long distance services in Spain. The range of services that can currently be provided by RSL Spain, pending further deregulation, is limited to closed-user group services.

Sweden. RSL Europe holds a 100% interest in RSL COM Sweden AB, which is licensed as an international carrier in Sweden, providing long distance services domestically and internationally. The company's principal competitor is Telia, the dominant supplier of telecommunications services in Sweden. The company also competes with emerging licensed public telephone operators (which are constructing their own fiber networks), such as Tele 2 and Worldcom, and from resellers.

Switzerland. RSL Europe holds a 78.5% interest in RSL COM Schweiz AG, which provides long distance services. The company's principal competitors in Switzerland are Swisscom, DiAx, Global One, WorldCom, and other smaller resellers.

United Kingdom. RSL COM UK, Ltd. holds an International Facilities Based Telecommunications license authorizing it to acquire IRUs and MILUs on international

satellite and cable systems, resell international private lines, as well as interconnect with, and lease capacity at, wholesale rates from British Telecom and Mercury. The company also holds an international simple resale license allowing the company to resell international private lines, as well as interconnect with, and lease capacity at wholesale rates from, British Telecom and Mercury. The company's principal competitors in the U.K. are British Telecom, the dominant supplier of telecommunications services in the U.K., and Mercury. The company also faces competition from emerging licensed public telephone operators (who are constructing their own facilities-based networks) such as Enerjis, and from resellers, including Worldcom and Global One.

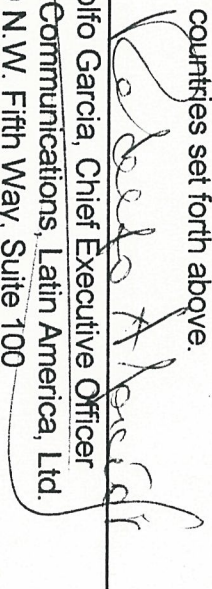
Latin America. RSL Latin America is a joint venture 51% owned by RSL Communications, Ltd. and 49% by Coral Gate. The Company recently entered into a joint venture agreement with PCM Comunicaciones, S.A. de C.V., a licensed long distance telecommunications service provider in Mexico, to provide domestic and international long distance telecommunications services primarily to small and medium-sized businesses in Mexico. RSL COM Venezuela, C.A., a wholly owned subsidiary of RSL Latin America, holds Concessions for Value Added and Data Services which allow it to provide international voice services via dedicated access provided on a private network. Its primary competitor is CANTV, the dominant supplier of telecommunications services in Venezuela. RSL Venezuela also competes with local Venezuelan affiliates of global carriers such as British Telecom, Global One and Mercury, regional competitors such as Telefonica de Espana, Impsat and Charter Communications, and callback operators.

No Special Concessions. RSL Latin America 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. RSL Latin America 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 the RSL Subsidiaries may serve, and will not enter into such agreements in the future.

RSL Latin America 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.

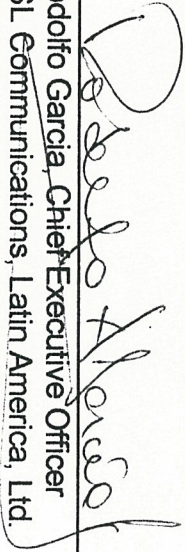
By:


Rodolfo Garcia, Chief Executive Officer
RSL Communications, Latin America, Ltd.
6300 N.W. Fifth Way, Suite 100
Fort Lauderdale, Florida 33309
Telephone No.: (954) 491-9500

CERTIFICATION

Pursuant to Section 1.2002 of the Commission's rules, RSL Communications, Latin America, Ltd. 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:



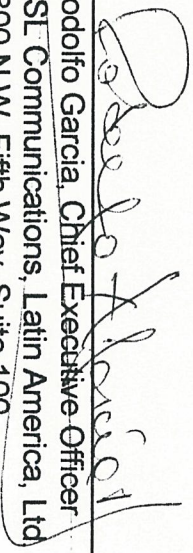
Rodolfo Garcia, Chief Executive Officer
RSL Communications, Latin America, Ltd.

6300 N.W. Fifth Way, Suite 100
Fort Lauderdale, Florida 33309
Telephone No.: (954) 491-9500

DECLARATION

I, Rodolfo Garcia, am CEO of RSL Communications, Latin America, Ltd. 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:



Rodolfo Garcia, Chief Executive Officer
RSL Communications, Latin America, Ltd
6300 N.W. Fifth Way, Suite 100
Fort Lauderdale, Florida 33309
Telephone No.: (954) 491-9500

February __, 1999

WAS1-401173