

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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FCC/MELLON

APR 02 1999

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In re Application of )  
)  
)  
NEXTLINK Long Distance Services, Inc. )  
)  
)  
for Authorization Pursuant )  
to Section 214 of the Communications Act )  
of 1934, As Amended, to Operate as )  
International Resale Carrier )

File No. \_\_\_\_\_

APPLICATION

NEXTLINK Long Distance Services, Inc. ("Applicant") hereby applies for authority pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, and Section 63.18 of the Federal Communications Commission's ("Commission") Rules, 47 C.F.R. § 63.18, to provide international communications services in the United States by reselling services of Commission-authorized carriers to all international points served by those carriers. Specifically, Applicant seeks Section 214 authority to resell all forms of international communications services permitted under and pursuant to the terms and conditions of 47 C.F.R. § 63.18 (e)(2). Additionally, Applicant seeks Section 214 authority to resell private line services to all countries that are subsequently determined by the International Bureau of the Commission to provide equivalent resale opportunities. Applicant requests streamlined processing under the Commission's international Section 214 rules.<sup>1</sup>

<sup>1</sup> Streamlining the International section 214 Authorization Process and Tariff Requirements, Report and Order, FCC 96-79, IB Docket No. 95-118 (released March 13, 1996), codified at 47 C.F.R § 63.12.

Grant of this Application will promote competition in international telecommunications services that will provide additional consumer choices and likely decrease consumer prices. Authorizing Applicant to resell international switched services is consistent with the Commission's goals of promoting competition in international telecommunications.<sup>2</sup> The Commission's Policy Statement on international accounting rate reform which confirms that international resale is in the public interest supports approval of this Application.<sup>3</sup> The Commission's approval of this Application will thus serve public convenience, necessity and interest.

#### SECTION 63.18 STATEMENT

In support of this request for authorization, the Applicant provides the following information as required by 47 C.F.R. § 63.18. The identifying letters and numerals here correspond to the subsections of 47 C.F.R. § 63.18.

- a) The Applicant seeking Section 214 authorization is:
- NEXTLINK Long Distance Services, Inc.  
500-108<sup>th</sup> Avenue NE, Suite 2200  
Bellevue, WA 98004
- b) NEXTLINK Long Distance Services, Inc. is a corporation organized in the United States of America under the laws of the State of Washington.

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<sup>2</sup> *Regulation of International Accounting Rates*, Report and Order, 7 FCC Rcd. 559 (1991). The Commission recognized that resale of international telecommunications services would provide public benefits by increasing competition, reducing prices for telecommunications services and eliminating the possibility of price discrimination. *Id* at para. 8.

<sup>3</sup> Policy Statement on International Accounting Rate Reform, FCC 96-37 (released January 31, 1996).

c) Correspondence regarding this Application should be directed to:

Daniel Gonzalez – Director, Regulatory Affairs  
NEXTLINK Communications, Inc.  
1730 Rhode Island Avenue, NW, Suite 1000  
Washington, DC 20036  
(202) 721-0999  
(202) 721-0995 (fax)

and

Doug Kinkoph – VP Regulatory & External Affairs  
NEXTLINK  
Two Easton Oval, Suite 300  
Columbus, OH 43219  
(614) 416-1468  
(614) 629-3201 (fax)

d) The Applicant does not currently have nor has it ever received international Section 214 authority from the Commission.

e) Applicant is applying for authority to resell the international services of authorized U.S. common carriers pursuant to the terms and conditions of 47

C.F.R. § 63.18 (e)(2).

f) ~~Not Applicable.~~

g) Not Applicable. This requirement is not applicable because Applicant is not seeking facilities-based authority under 47 C.F.R. § 63.18(e)(6).

h) 1) Applicant is not affiliated with a foreign carrier, as that term is defined in 47 C.F.R. § 63.18 (h)(1)(B)(ii).

2) Applicant is wholly owned by NEXTLINK Communications, Inc. Eagle River Investments, L.L.C. owns an approximate 36% equity interest in NEXTLINK Communications, Inc. Eagle River Investments, L.L.C. is majority owned and controlled by Craig O. McCaw. Ampersand Telecom, L.L.C. owns an

approximate 18% equity interest in NEXTLINK Communications, Inc.

Amperсанд Telecom, L.L.C. is majority owned and controlled by Wendy P.

McCaw. No other party owns 10% or greater interest in NEXTLINK

Communications, Inc. or in Eagle River Investments, L.L.C. The name, address, citizenship and principal business of each of the ten percent or greater direct and indirect shareholders or other equity holders in the Applicant are:

NEXTLINK Communications, Inc.  
500 – 108<sup>th</sup> Avenue NE, Suite 2200  
Bellevue, WA 98004

✓ Citizenship: USA  
Principal Business: Telecommunications

Eagle River Investments, L.L.C.  
2320 Carillon Point  
Kirkland, WA 98033

✓ Citizenship: USA  
Principal Business: Telecommunications

Craig O. McCaw  
2320 Carillon Point  
Kirkland, WA 98033

✓ Citizenship: USA  
Principal Business: Telecommunications

Amperсанд Telecom, L.L.C.  
c/o Gregory J. Parker  
1301 Santa Barbara Street  
Post Office Box 939  
Santa Barbara, CA 93102  
✓ Citizenship: USA  
Principal Business: Investment Company

Wendy P. McCaw  
c/o Gregory J. Parker  
1301 Santa Barbara Street  
Post Office Box 939  
Santa Barbara, CA 93102  
Citizenship: USA  
Principal Business: Investments

There are no interlocking directorates as contemplated by 47 CFR 63.18(h)(2).

- 3) Applicant is not affiliated with the carriers whose facilities-based services they propose to resell.
- 4) Not applicable. This requirement is not applicable because the Applicant is not affiliated with a foreign carrier.
- 5) Applicant will notify the Commission as required, pursuant to 47 C.F.R. § 63.18 (h)(5), as to changes in their business, should they occur, that is regulated under 47 C.F.R. §§ 63.18(h)(3)-(4).
- 6) Not applicable. This requirement is not applicable because Applicant does not seek to operate as a facilities-based international carrier.
- 7) Not applicable. This requirement is not applicable because the Applicant is not affiliated with a foreign carrier.
- 8) Not applicable. This requirement is not applicable because the Applicant is not affiliated with a foreign carrier.
- i) Applicant certifies that it has not agreed to accept special concessions, as defined in 47 C.F.R. § 63.18 (i), directly or indirectly from any foreign carriers or

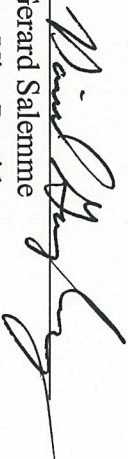
administration with respect to traffic or revenue flows between the U.S. and any foreign country which the Applicant may serve under the authority granted under this part and will not enter into such agreements in the future.

- j) Applicant certifies that, to the best of its knowledge, information and belief, it is not subject to a denial of Federal Benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

CONCLUSION

As demonstrated in this Application, the public interest, convenience and necessity would be furthered by grant of the Section 214 authorization requested by the Applicant. NEXTLINK Long Distance Services, Inc. therefore respectfully requests that the Commission grant its Application for authority to resell international telecommunications services between the United States and international locations.

Respectfully submitted,

By: 

R. Gerard Salemme  
Senior Vice President

Daniel Gonzalez

Director Regulatory Affairs  
NEXTLINK Communications, Inc.  
1730 Rhode Island Avenue, NW, Suite 1000  
Washington, DC 20036  
(202) 721-0999

Dated: 3/29/99



CERTIFICATION OF APPLICANT

(1) I hereby certify that I am Senior Vice President of NEXTLINK Long Distance Services, Inc., and that the statements in the foregoing Application for Section 214 authority to provide international telecommunications services are true, complete and correct to the best of my knowledge and are made in good faith.

(2) No party to this application, as defined in 47 C.F.R. § 1.202(b), is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

By: 

Name: R. Gerard Salemme

Title: Senior Vice President

Date: 3-29-99