

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: _____

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D.C. 20554

In the Matter of **Bitro Telecommunications, Inc.**)
)
Application for authority pursuant)
to Section 214 of the Communications)
Act of 1934, as amended, to resell)
service of other common carriers)
to provide switched voice services)
from the contiguous United States,)
Hawaii, Puerto Rico, and the U.S.)
Virgin Islands to international)
points.)

File No.)
FCC/MELLON)
APR 09 1999)

APPLICATION

Pursuant to Section 214 of the Communications Act of 1934, as amended, and Section 63.18 of the Federal Communications Commission's ("FCC") Rules, 47 C.F.R. §§63.18 et seq., Bitro Telecommunications, Inc. ("Bitro") by its undersigned attorney, hereby requests authority to operate as a resale carrier pursuant to the terms and conditions in Section 63.18(e)(2) between the United States and various international points. 47 C.F.R. §§63.18(e)(2). Bitro further requests that this Application be granted according to the streamlined processing procedures set forth in 47 C.F.R. §§63.12.

Bitro, a corporation organized under the laws of the State of California, is a nonfacilities-based carrier that intends to purchase telephone access services from underlying carriers to provide residential and commercial low cost telecommunication services within the United States and to international points as well. Bitro believes a significant potential exists for continued growth in the international voice market and that this market expansion will be accelerated by additional competition by new entrants.

This position is consistent with the FCC decisions In the Matter of TMC Communications, Inc., 5 FCC Rcd 2466, fn. 9 (1990); See. Teltec Saving Communications Co., mimeo No. 3548, released April 4, 1986 and cases cited therein (competition in international markets is beneficial, competition will be in the public interest and that additional competitors will enhance that competition). The FCC has authorized new entrants that propose to resell international services. [See e.g. Marsch Communications Management, Inc., 3 FCC Rcd 821, erratum, 3 FCC Rcd 1685 (Int.Fac.Div.1988); International Telecharge, Inc. et.al., 2 FCC Rcd 1782 (Int.Fac.Div. 1987)]

Bitro believes that the added competition its entry will bring to the market will benefit the consumers of United States overseas 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.

Bitro submits the following information in support of its request for authorization pursuant to Section 63.18 of the FCC's Rules, 47 C.F.R. §§63.18.

- (a) Name, address, and telephone number of applicant:
- Bitro Telecommunications, Inc.
3200 Wilshire Blvd., Suite 1200, N. Tower
Los Angeles, CA 90010
Telephone: (213) 739-5050

(b) Applicant is incorporated under the laws of the State of California.

(c) Correspondence concerning this application should be sent to:

Michael W. Mlinar, Esq.
Communications Consulting Services
1374 Danielson Road
Santa Barbara, CA 93108
Phone: (805) 565-3338
Facsimile: (805) 565-1547

- (d) Bitro has never received authority under Section 214 of the Act.
- (e)(2)(i) Bitro seeks authority to resell the international services of authorized U.S. common carriers for the provision of international basic switched, private line, data, television and business services to all international points pursuant to Section 63.18(e)(2).

(e)(2)(ii) In support of this request, Applicant states that it will comply with 47 C.F.R. §§63.18(e)(2)(ii)(A),

§§63.18(e)(2)(ii)(B), and §§63.18(e)(2)(ii)(C).

- (h) Bitro certifies that it is not affiliated with any foreign carriers. In support of this certification, Bitro provides the name, address, citizenship, and principal businesses of its ten percent or greater direct or indirect shareholders or other equity holders and the identity of any interlocking directorates:

Jason Kim
Chief Executive Officer
3200 Wilshire Blvd., Suite 1200, N. Tower
Los Angeles, CA 90010
Telephone: (213) 739-5050
Percentage Ownership in Bitro: 100%
Principal Business: Bitro Telecommunications, Inc.

No interlocking directorates exist. 47 C.F.R. §§ 63.18(h)(2).

Pursuant to 47 C.F.R. §§63.18(h), Bitro further certifies that neither it or any of its shareholders are (1)

affiliated with the U.S. carrier whose facilities-based services Bitro proposes to resell or (2) affiliated with a foreign carrier in any of Bitro's proposed destination markets.

- (j) Applicant Bitro hereby certifies that neither the Applicant nor any party to the Applicant is subject to a denial of Federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988.
- (i) Bitro certifies that it has not agreed to take any special concessions from a foreign carrier.

CONCLUSION

As demonstrated in this application Bitro Telecommunications, Inc.. is legally, financially, and technically qualified to provide the services for which it requests authority. For the reasons stated above, Bitro Telecommunications, Inc. 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 Bitro Telecommunications, Inc. for the purpose of providing resold switched voice communications between the United States and the overseas points herein specified.

Respectfully submitted,




Michael W. Mlinar, Esq.
Communications Consulting Services
1374 Danielson Road
Montecito, CA 93108

Telephone and facsimile: (805) 565-3338

CERTIFICATION OF APPLICANT

I hereby certify that the statements in the foregoing application for Section 214 authority are true, complete, and correct to the best of my knowledge and are made in good faith.

Bitro Telecommunications, Inc.


Michael W. Milnak

Regulatory Counsel

April 8, 1999

From: "Michael W. Milnar" <milnar@silcom.com>
To: "Fran Eisenstein" <feisenst@fcc.gov>
Date: Wed, Apr 28, 1999 3:57 PM
Subject: Bitro Telecommunications, Inc.

Fran:

Attached is a replacement page 3 of the application for Bitro Telecommunications, Inc.

Jason Kim, CEO of Bitro Telecommunications, Inc. is a citizen of the United States.

Would you please return email to me the ITC number assigned as soon as possible. The client needs this number to complete a contract negotiation and it would be very helpful if I could get it to Bitro today.

Thanks for all of your help, and the help by Jackie Ponti and Alicia Smothers.

Mike Milnar

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- (e)(2)(ii) In support of this request, Applicant states that it will comply with 47 C.F.R. §§63.18(e)(2)(i)(A), §§63.18(e)(2)(i)(B), and §§63.18(e)(2)(i)(C).
- (h) Bitro certifies that it is not affiliated with any foreign carriers. In support of this certification, Bitro provides the name, address, citizenship, and principal businesses of its ten percent or greater direct or indirect shareholders or other equity holders and the identity of any interlocking directorates:

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Citizenship: U.S.
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