

**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

*FBT*

Description of Application: \_\_\_\_\_

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NOV 18 1999

RECEIVED

**PAUL, HASTINGS, JANOFSKY & WALKER LLP**

A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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LEONARD S. JANOFSKY  
CHARLES M. WALKER  
LEE G. PAUL  
November 16, 1999

ARK MORI BUILDING  
12-32, AKASAKA 1-CHOME  
MINATO-KU, TOKYO 107, JAPAN  
TELEPHONE (03) 3586-4711

WRITER'S DIRECT ACCESS

OUR FILE NO

(202) 508-9530

31284.99547

**BY SAME DAY DELIVERY COURIER**

Federal Communications Commission  
International Bureau Telecommunications Division  
Post Office Box 358115  
Pittsburgh, Pennsylvania 15251-5115

Re: Application of Telecommunications Global Partners, LLC for Authority Pursuant to Section 214 of the Communications Act of 1934, as amended, for Global Facilities-Based and Global Resale Authority

Dear Sir or Madame:

We represent Telecommunications Global Partners, LLC ("Telecommunications Global"), which requests authority pursuant to Section 214 of the Communications Act, 47 U.S.C. § 214, and Section 63.18 of the Commission's Rules, 47 C.F.R. § 63.18, for global facilities-based and global resale authority between the United States and various international points.

On behalf of Telecommunications Global, we respectfully submit herewith for filing with the Commission one original and six (6) copies of Telecommunications Global's Application pursuant to Section 214 and the Commission's Rules. In addition, Telecommunications Global requests streamlined treatment of this Application pursuant to 47 C.F.R. § 63.12(c)(1)(i), in that the Applicant qualifies for a presumption of non-dominance under 47 C.F.R. § 63.10(a)(1), because the applicant has no foreign carrier affiliations. A completed FCC Form 159 ("Remittance Advice") is also enclosed.

On behalf of Telecommunications Global, there is also enclosed with this letter a check made payable to the order of the Commission in the amount of Seven Hundred Eighty Dollars and No Cents (\$780.00). This check constitutes payment in full of the processing fee for the Application herewith submitted for filing.

PAUL, HASTINGS, JANOFSKY & WALKER LLP

Federal Communications Commission  
November 16, 1999  
Page 2

Please date stamp the extra copy of this Application as having been received by the Commission's application processing fee payment facility at the Mellon Bank in Pittsburgh, Pennsylvania as of the date of such receipt, and return the date-stamped "File Copy" of this letter to our messenger.

In the event that the Commission or its staff should have any questions concerning the Application herewith submitted for filing, kindly refer them to Telecommunications Global's undersigned counsel.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Michelle W. Cohen".

Michelle W. Cohen  
for PAUL, HASTINGS, JANOFSKY & WALKER LLP

Enclosures



READ INSTRUCTIONS CAREFULLY  
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION  
**REMITTANCE ADVICE**

APPROVED BY OMB 3060-0589

(11) LOCKBOX # 358115

PAGE NO. 1 OF 1

SPECIAL USE  
FCC USE ONLY

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card)  
Telecommunications Global Partners, LLC

SECTION A - PAYER INFORMATION

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

(4) STREET ADDRESS LINE NO. 1

2601 S. Bayshore Drive

(5) STREET ADDRESS LINE NO. 2

Suite 700

(6) CITY

Coconut Grove

(7) STATE  
FL

(8) ZIP CODE  
33133

(9) DAYTIME TELEPHONE NUMBER (include area code)

(305) 856-9444

(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

(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

(20B) PAYMENT TYPE CODE (PTC)

(21B) QUANTITY

(22B) FEE DUE FOR (PTC) IN BLOCK 20B

FCC USE ONLY

(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

(20B) PAYMENT TYPE CODE (PTC)

(21B) QUANTITY

(22B) FEE DUE FOR (PTC) IN BLOCK 20B

FCC USE ONLY

(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

(20C) PAYMENT TYPE CODE (PTC)

(21C) QUANTITY

(22C) FEE DUE FOR (PTC) IN BLOCK 20C

FCC USE ONLY

(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

(20D) PAYMENT TYPE CODE (PTC)

(21D) QUANTITY

(22D) FEE DUE FOR (PTC) IN BLOCK 20D

FCC USE ONLY

SECTION D - TAXPAYER INFORMATION (REQUIRED)

(25) PAYER TIN  
0 6 5 0 9 4 1 5 6 3

(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, Michelle W. Cohen (PRINT NAME), 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 Michelle Cohen

(28) MASTERCARD

MASTERCARD/VISA ACCOUNT NUMBER

SECTION F - CREDIT CARD PAYMENT INFORMATION

EXPIRATION DATE:

MONTH YEAR

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

Look for National Data found on the front of this check and the integrated logo on back. If not present, do not cash.

TELECOMMUNICATION GLOBAL 08-99

1470

PARTNERS, LLC  
2601 S. BAYSHORE DR., STE. 700  
COCONUT GROVE, FL 33155

Date 11/15/99

63-27/631 FL  
923

Pay to the Order of FCC \$ 780.00

Seven Hundred Eighty Dollars and 00/100 Dollars



**NationsBank**

NationsBank, N.A.

ACH R/T 063100277

For 214 License TRP David Pyzdrowski

⑈001170⑈ ⑆063100277⑆ 003060834556⑈





following information pursuant to Section 63.18 of the Commission's Rules:

(a) Name, address and telephone number of Applicant:

Telecommunications Global Partners, LLC  
2601 S. Bayshore Drive  
Suite 700  
Coconut Grove, FL 33133  
Attention: Mr. David Godwin  
Chief Executive Officer  
(305) 856-9444 (telephone)  
(305) 856-9546 (facsimile)

(b) Telecommunications Global is a limited liability company organized under the laws of the state of Delaware.

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

Telecommunications Global Partners, LLC  
2601 S. Bayshore Drive  
Suite 700  
Coconut Grove, FL 33133  
Attention: Mr. David Godwin  
Chief Executive Officer  
(305) 856-9444 (telephone)  
(305) 856-9546 (facsimile)

with a copy to:

Paul, Hastings, Janofsky & Walker LLP  
1299 Pennsylvania Avenue, NW  
10th Floor  
Washington, D.C. 20004  
Attention: Michelle W. Cohen, Esq.  
(202) 508-9530 (telephone)  
(202) 508-9700 (facsimile)

(d) Telecommunications Global has not previously applied for nor been granted authority under Section 214 of the Communications Act.

(e)(i) Telecommunications Global is requesting global Section 214 authority to operate as a facilities-based carrier pursuant to the terms and conditions of

Section 63.18(e)(1) of the Commission's Rules. There are no countries for which the applicant does not request authorization. Telecommunications Global certifies that it will comply with the conditions contained in Sections 63.21 and 63.22 of the Commission's Rules.

(e)(ii) Telecommunications Global is also requesting global Section 214 authority to resell the international services of authorized U.S. common carriers pursuant to the terms and conditions of Section 63.18(e)(2) of the Commission's Rules. There are no countries for which the applicant does not request authorization. Telecommunications Global certifies that it will comply with the conditions contained in Sections 63.21 and 63.23 of the Commission's Rules.

(f) As set forth above, applicant is applying for global authority under Sections 63.18(e)(1) and 63.18(e)(2) of the Commission's Rules.

(g) Not applicable.

(h) The name, address, citizenship, principal businesses of Telecommunications Global's ten percent or greater direct and indirect shareholders or other equity holders, and the percentage of equity owned by each shareholder are as follows:

Name:	Overseas Group, LLC
Address:	2601 S. Bayshore Drive Suite 700 Coconut Grove, FL 33133
Principal Business:	Telecommunications Holding Co.
Percentage Equity:	60 Percent



Name: Lampert Group, LLC  
Address: 2601 S. Bayshore Drive  
Suite 700

Principal Business: Coconut Grove, FL 33133  
Telecommunications Holding Co.  
Percentage Equity: 40 Percent

All of the above shareholders are U.S. entities.

There are no interlocking directorates with foreign carriers.

(i) By this certification, Telecommunications Global certifies that it is not affiliated with any foreign carriers.

(j) Telecommunications Global is not a foreign carrier and is not affiliated with any foreign carriers.

(k) This section is not applicable. The applicant is not a foreign carrier and is not affiliated with any foreign carriers.

(l) This section is not applicable. The applicant is not a foreign carrier and is not affiliated with any foreign carriers.

(m) Telecommunications Global seeks to be classified as non-dominant on all routes, as it is not a foreign carrier and is not affiliated with any foreign carriers.

(n) Telecommunications Global certifies that it has not agreed to accept special concessions (as defined in Section 63.14(b) of the Commission's Rules) directly or indirectly, from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route and will not enter into such agreements in the future.

(o) Pursuant to Sections 1.2001 through 1.2003 of the Commission's

Rules, this certifies that no party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

(p) The applicant qualifies for streamlined treatment of this application pursuant to Section 63.12 in that there are no foreign carrier affiliations.



**CONCLUSION**

The Commission has recognized that increased competition in international markets is beneficial and that those markets will support additional carriers. Additional market entry will promote lower prices, innovative services, increased customer choice, and efficient utilization of telecommunications resources. Telecommunications Global expects to support these goals through the provision of high-quality, competitive international communications services. A grant of Telecommunications Global's application, therefore, will serve the public interest, convenience and necessity.

Respectfully submitted,

Telecommunications Global Partners, LLC

By:



David Godwin

Title: Chief Executive Officer

Dated: November 15, 1999

LAW OFFICES OF  
**PAUL, HASTINGS, JANOFSKY & WALKER LLP**

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ROBERT P. HASTINGS (1910-1998)  
ESQUIRE

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December 13, 1999

WRITER'S DIRECT ACCESS

OUR FILE NO.

(202)508-9530  
mwcohen@phiw.com

31284.99547

**VIA MESSENGER AND FACSIMILE**

Ms. Fran Eisenstein  
Federal Communications Commission  
International Bureau  
Room CY-A257  
The Portals 2 Building  
445 12th Street, SW  
Washington, D.C. 20054

Re: Request of Telecommunications Global Partners, LLC for Global Authority Pursuant to Section 214 of the Communications Act of 1934, as amended, to Operate as an International Global Facilities-Based and Global Resale Carrier: Supplemental Clarifying Information

Dear Ms Eisenstein:

Pursuant to your request, Telecommunications Global Partners, LLC ("Telecom Global"), by its undersigned counsel, submits this letter to clarify certain information pertaining to Telecom Global's above-referenced application for authority pursuant to Section 214 of the Communications Act of 1934, as amended.

Specifically, with regard to Telecom Global's response to information required by § 63.18(h), the name, address, citizenship and principal business of the shareholders that control ten (10) percent or more of Telecom Global are:



**PAUL HASTINGS, JANOFSKY & WALKER LLP**

Ms. Fran Eisenstein  
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Page 2

Name: Nancy Ruffing  
Address: 9841 Airport Boulevard  
Suite 1524  
Los Angeles, CA 90045  
U.S.  
Citizenship: U.S.  
Principal Business: Telecommunications  
Percentage Equity: 15%

Name: Nadeem Eliah  
Address: 2601 South Bayshore Drive  
Suite 700  
Miami, FL 33133  
Pakistan  
Citizenship: Pakistan  
Principal Business: Telecommunications  
Percentage Equity: 15%

Name: Bill Bader  
Address: 9841 Airport Boulevard  
Suite 1524  
Los Angeles, CA 90045  
U.S.  
Citizenship: U.S.  
Principal Business: Telecommunications  
Percentage Equity: 15%

Name: David Goodwin  
Address: 2601 South Bayshore Drive  
Suite 700  
Miami, FL 33133  
U.S.  
Citizenship: U.S.  
Principal Business: Telecommunications  
Percentage Equity: 15%

Name: Lampert Group, LLC  
Address: 2601 S. Bayshore Drive  
Suite 700  
Cocoanut Grove, FL 33133  
Citizenship: Texas limited liability company  
Principal Business: Telecommunications holding company  
Percentage Equity: 15%

PAUL, HASTINGS, JANOFSKY & WALKER LLP

Ms. Fran Eisenstein

Federal Communications Commission

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Page 3

Name: PrinVest Corp.  
Address: 3 Princess Road  
Lawrenceville, NJ 08648  
Citizenship: New Jersey corporation  
Principal Business: Telecommunications holding company  
Percentage Equity: 15%

Please feel free to contact me should you have any questions concerning the foregoing.

Respectfully submitted,



Michelle W. Cohen

for PAUL, HASTINGS, JANOFSKY & WALKER LLP

Counsel for Telecommunications Global Partners, LLC