Categories of Services for 214 Applications (Streamline/Non-streamline)

	Des							X		
	Description of Application:	SUBMARINE CABLE LANDING LICENSE	SPECIAL TEMPORARY AUTHORITY	ASSIGNMENT OF LICENSE	INTERNATIONAL SPECIAL PROJECT SWITCHED RESALE SERVICE	INMARSAT AND MOBILE SATELLITE SERVICE	INDIVIDUAL FACILITIES-BASED SERVICE INTERCONNECTED PRIVATE LINE RESALE SERVICE	D	LIMITED/GLOBAL FACILITIES-BASED SERVICE	LIMITED/GLOBAL RESALE SERVICE

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

In the Matter of)	
INTERNATIONAL TELECOMMUNICATIONS, LLC	File No. ITC-
Application for Authorization Pursuant to Section 214 of the Communications Act of 1934 to	
Provide International Facilities-Based Services,)	
And International Switched Resale Services, On A	
Global Basis	

APPLICATION OF INTERNATIONAL TELECOMMUNICATIONS, LLC

and international switched resale services, on a global basis to Section 214 of the Communications Act of 1934, as amended ("Act") and Sections 63.12 and 63.18 of the Commission's Rules, for authority to provide international facilities-based services. International Telecommunications, LLC ("InTel") hereby applies for authority pursuant

marketplace. This will further the Commission's procompetitive policies and serve the public (1953); Telocator Network of America v. F.C.C., 691 F.2d 525 (D.C. Cir. 1982); and Authorized entrants to the international marketplace. RCA Communications, Inc. v. F.C.C., 346 U.S. 86 interest by bringing the benefits of the increased customer choice and alternative services by new User Policy, 100 FCC 2d 177 (1985). A grant of this application will enable InTel to enter into the global competitive

for a presumption of non-dominance under Section 63.10(a)(4) of the Commission's Rules the Commission's Rules. In Tel has no affiliation with any U.S. or foreign carrier, and qualifies This application is eligible for streamlined processing procedures under Section 63.12 of

provisions of Section 63.18 of the Commission's Rules: The following information is set forth in response to the corresponding relevant lettered

- and its place of business is 55 Asbury Park, Sugar Land, Texas 77479. Its telephone number is (713) 412-9565 (a) The name of the applicant is International Telecommunications, LLC ("InTel");
- Texas. **(b)** InTel is a limited liability corporation organized under the laws of the State of
- <u>O</u> Robert E. Conn Correspondence regarding this application should be addressed to:

Kobert E. Conn
Shaw Pittman
2300 N Street, N.W.
Washington, D.C. 20037
(202) 663-8093

- (d) InTel has not previously received authority under Section 214 of the Act
- acquire interests in all appropriately licensed U.S. common carrier and non-common carrier pursuant to the terms and conditions of Section 63.18(e)(1). except to those points indicated on the Commission's exclusion list. basic switched, private line, data, television and business services to all international points facilities, and any necessary overseas connecting facilities as needed, to provide international 63.22 of the Commission's Rules Certifications, InTel will comply with the terms and conditions contained in Sections 63.21 and (e) Ξ InTel is requesting authority to operate as a facilities-based carrier The authority requested is to As indicated in the attached
- authorized U.S. common carriers, subject to Section 63.23, for the provision of international (e) \mathcal{O} InTel is also requesting authority to resell the international services of

services over private lines countries at the foreign ends of the private lines which appear now, or in the future, on a pursuant to Section 63.16, to provide switched services over its authorized private lines to those the terms and conditions contained in Sections 63.21 and 63.23. In Tel is requesting authority pursuant to the terms and conditions Section 63.18(e)(2), except to those points indicated on the Commission list of destinations to which the FCC has authorized the provision of switched Commission's exclusion list. As indicated in the attached Certifications, InTel will comply with basic switched, private line, data, television and business services to all international points

- (g) This section is not applicable
- principal business will be telecommunications, and whose address is 55 Asbury Park, Sugar Land, Texas 77479. (h) InTel is wholly-owned by Deborah Milam Scraper, a U.S. citizen, whose There are no interlocking directorates with any carrier, foreign or otherwise
- carrier; nor is InTel a foreign carrier Ξ As indicated in the attached Certifications, InTel is not affiliated with a foreign
- provide international telecommunications services to any destination country where InTel operates as a foreign carrier or is affiliated with any foreign carrier, within the meaning of Sections 63.18(j)(1), (2), (3), and (4). As indicated in the attached Certifications, InTel does not seek or intend to
- (k) This section is not applicable
- said U.S. carrier is a foreign carrier or is affiliated with a foreign carrier carrier for the purpose of providing international telecommunications services to a country where Ξ InTel does not propose to resell the international switched services of any U.S
- (m) This section is not applicable

route where the foreign carrier possesses market power on the foreign end of the route, and InTel concessions directly or indirectly from any foreign carrier with respect to any U.S. international will not enter into such agreements in the future (E) As indicated in the attached Certifications, InTel has not agreed to accept special

benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988 As indicated in the attached Certifications, InTel is not subject to a denial of Federal

necessity will be served by a prompt grant of this application, pursuant to streamlined processing under Section 63.12. WHEREFORE, InTel respectfully submits that the public interest, convenience and

Respectfully submitted

INTERNATIONAL TELECOMMUNICATIONS, LLC

By:

Robert E. Conn Shaw Pittman 2300 N Street, N.W. Washington, D.C. 20037

Its Attorney

(202) 663-8093

February 3, 2000

Document #: 886172 v.1

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CERTIFICATIONS

- ali of its certificanous: and (b) Section 63.22, including without limitation, In lei's Section 63.21, including without huntation, in Tel's responsibility for the continuing accuracy of LLC ("InTel") certifies that it will comply with the forms and conditions comained in. (a) responsibilines regarding facilities-based international services. Pursuant to Section 63.18(c)(1) of the FCC Rules, International Telecomorquications,
- 2. Pursuant to Section 63.18(e)(2)(iii) of the FCC Rules, inTel certifies that it will comply with the terms and conditions contained in: (a) Section 63.21, including without Section 63.23, including without limitation, InTel's responsibilities regarding resold international limitation, InTel's responsibility for the continuing accuracy of all of its certifications, and (b)
- 3. Pursuant to Section 63.18(t) of the FCC Rules, InTel certifies that it is not a foreign carrier, nor is it affiliated with any foreign carrier.
- InTel operates as a foreign carner or is affiliated with any foreign carrier, within the meaning of intend to provide international telecommunications services to any destination country where Sections 63.18(j)(1), (2), (3), and (3). Pursuant to Section 63.18(j) of the FCC Rules, In Tel certifies that it does not seek or
- route, and InTel Will not eater into such agreements in the future international route where the foreign eartier possesses market power on the foreign end of the accept special concessions directly or indirectly from any foreign owner with respect to any U.S. 5. Pursuant to Section 63.18(a) of the FCC Rules, InTel certifies that it has not agreed to
- subject to a demal of Federal benetits that include FCC benefits pursuant to Section 5301 of the Ann-Drug Abuse Act of 1988. Pursuant to Sections 1.2001-1.2003 of the FCC Rules, in Tel certifies that it is not

February 5, 2000

International Telecommunications, LLC

Deborah Milam Scraper
Chief Executive Officer

Dotamant & Esplad v 1

CERTIFICATIONS

- responsibilities regarding facilities-based international services. all of its certifications; and (b) Section 63.22, including without limitation, InTel's Section 63.21, including without limitation, InTel's responsibility for the continuing accuracy of LLC ("InTel") certifies that it will comply with the terms and conditions contained in: (a) 1. Pursuant to Section 63.18(e)(1) of the FCC Rules, International Telecommunications,
- Section 63.23, including without limitation, InTel's responsibilities regarding resold international limitation, InTel's responsibility for the continuing accuracy of all of its certifications; and (b) comply with the terms and conditions contained in: (a) Section 63.21, including without 2. Pursuant to Section 63.18(e)(2)(iii) of the FCC Rules, InTel certifies that it will
- carrier; nor is it affiliated with any foreign carrier. 3. Pursuant to Section 63.18(i) of the FCC Rules, InTel certifies that it is not a foreign
- Sections 63.18(j)(1), (2), (3), and (4). InTel operates as a foreign carrier or is affiliated with any foreign carrier, within the meaning of intend to provide international telecommunications services to any destination country where 4. Pursuant to Section 63.18(j) of the FCC Rules, InTel certifies that it does not seek or
- route, and InTel will not enter into such agreements in the future accept special concessions 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 5. Pursuant to Section 63.18(n) of the FCC Rules, InTel certifies that it has not agreed to
- subject to a denial of Federal benefits that include FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. Pursuant to Sections 1.2001-1.2003 of the FCC Rules, InTel certifies that it is not

			By:
International Telecommunications, LLC	Chief Executive Officer	Deborah Milam Scraper	

February 3, 2000

CERTIFICATE OF SERVICE

3rd day of February, 2000, by first class mail, postage prepaid, on the following: I hereby certify that I have caused copies of the foregoing Application to be served this

Deputy Assistant Secretary of
Defense (Telecommunications)
Office of the Assistant Secretary
Of Defense
Pentagon, Room 3E160
Washington, D.C. 20401

National Security Agency G042, NSA, EMC Center Room 1C166 9800 Savage Road Fort George Meade, MD 20755

U.S. Coordinator and Director
Office of International Communications
Policy (EB-TD)
Department of State
21st and C Streets, N.W.
Washington, D.C. 20305-2000
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Chief Regulatory Counsel
Defense Communications Agency
Washington, D.C. 20305-2000
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National Telecommunications and Information Administration 14th & Constitution Avenue, N.W. Room H 417
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Jeanette Solomon

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