

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

- LIMITED/GLOBAL RESALE SERVICE
- LIMITED/GLOBAL FACILITIES-BASED SERVICE
- LIMITED/GLOBAL FACILITIES-BASED/RESALE SERVICE
- INDIVIDUAL FACILITIES-BASED SERVICE
- INTERCONNECTED PRIVATE LINE RESALE SERVICE
- INMARSAT AND MOBILE SATELLITE SERVICE
- INTERNATIONAL SPECIAL PROJECT
- SWITCHED RESALE SERVICE
- TRANSFER OF CONTROL
- ASSIGNMENT OF LICENSE
- PRO FORMA TRANSFER/ASSIGNMENT
- SPECIAL TEMPORARY AUTHORITY
- SUBMARINE CABLE LANDING LICENSE

Description of Application: _____

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

FCC/MELTON FEB 09 2000

In the Matter of

Cincinnati Bell Long Distance Inc.

File No. ITC-00-_____

Application Pursuant to Section 214 for
Global Authority to Provide International
Facilities-Based and Resale Services

APPLICATION FOR SECTION 214 AUTHORIZATION

Cincinnati Bell Long Distance Inc. ("CBLD") hereby applies, pursuant to Section 214 of the Communications Act of 1934, for global authority to provide facilities-based and resale services. The proposed services will include international basic switched, non-interconnected private line, data, television, and business services to all international points. These services will also include international basic switched services via private lines to authorized countries.

This Application qualifies for streamlined processing because, while CBLD is affiliated with foreign carriers, these foreign carriers control far less than 50 percent of the relevant international transport and local markets, and thus CBLD qualifies for a presumption of non-dominance on all international routes.¹

¹ 47 C.F.R. §§ 63.12(c)(1)(ii) & 63.10(a)(3).

The following information is provided in compliance with Section 63.18 of the Commission's Rules:

The name, address, and telephone number of the Applicant is:

Cincinnati Bell Long Distance Inc.
201 E. Fourth Street, 102-715
Cincinnati, Ohio 45201-2301
(513) 397-6351

(b) CBLD is a corporation organized under the laws of the State of Delaware.

(c) Correspondence concerning this Application should be directed to:

Christopher J. Wilson
Cincinnati Bell Inc.
201 E. Fourth Street, 102-715
Cincinnati, Ohio 45201-2301

with a copy to:

Alfred M. Mamlet
Colleen A. Sechrest
Steptoe & Johnson, LLP
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036
(202) 429-3000

(d) CBLD currently does not have global Title II authority.

(e) In this Application, CBLD requests authority pursuant to 47 C.F.R. § 63.18(e)(1), (2) & (4) to provide international facilities-based and resale services to all international points, including affiliated countries. CBLD certifies by signature to this Application that it will comply with the conditions contained in 47 C.F.R. §§ 63.21-23.

(f) At this time, CBLD seeks no other authorization available under 47 C.F.R. § 63.18(e).

(g) CBLD is seeking facilities-based and resale authority under 47 C.F.R. § 63.18(e) to provide international services to all international points. The grant of this Application will not constitute a major action as defined in 47 C.F.R. § 1.1305. Accordingly, no environmental information is required to be submitted with this Application under 47 C.F.R. § 1.1311.

(h) CBLD is a wholly-owned subsidiary of Cincinnati Bell Inc. ("CBI"). CBI's principal business is the provision of communications services. CBI is a publicly traded corporation. ~~No person or entity owns, directly or indirectly, 10 percent or more~~ of CBI. Neither CBLD nor CBI have interlocking directorates with foreign carriers.

The principal place of business of CBI is:

Cincinnati Bell Inc.
201 E. Fourth Street, 102-715
Cincinnati, OH 45201-2301
(513) 397-6351

(i) CBLD certifies, by signature to this Application, that it is affiliated with the following two carriers:

First, CBLD is affiliated with MarcaTel S.A. de C.V. ("MarcaTel"), a Mexican carrier in which CBI has an indirect 32.06 percent interest. MarcaTel is authorized in Mexico to provide international and pre-subscribed long distance telecommunications services. As a competitive carrier, MarcaTel has only minimal market share.

Second, CBLD is affiliated with Storm Telecommunications, Limited (“Storm”), through CBI’s indirect 40% interest. Storm is a competitive international telecommunications carrier incorporated in the United Kingdom. Storm is registered to provide telecommunications services in Norway, the Netherlands, and Switzerland, and it holds licenses to offer services in the United Kingdom, France, Germany and Austria. Storm began operating in France, Germany, the Netherlands, and the United Kingdom on June 15, 1998 and currently has minimal market share in these countries. Storm plans to begin operations in Austria and Switzerland soon.

(j) Other than as stated above, CBLD certifies, by signature to this Application, that it does not seek to provide service to any country in which (1) CBLD is a foreign carrier; or (2) CBLD controls a foreign carrier; or (3) two or more foreign carriers (or parties that control foreign carriers) together own more than 25 percent of CBLD and are parties to, or beneficiaries of, a contractual relation affecting the provision or marketing of international basic telecommunications services in the United States.

(k) CBLD is affiliated with foreign carriers in Mexico (MarcaTel) and the United Kingdom (Storm). Both Mexico and the United Kingdom are members of the World Trade Organization (“WTO”), as are all countries in which MarcaTel operates or intends to operate in the near future.

(l) As demonstrated in paragraph (m) below, CBLD is entitled, pursuant to 47 C.F.R. § 63.10(a)(3), to non-dominant status on all international routes, included affiliated routes.

(m) Pursuant to 47 C.F.R. § 63.10(a)(3), CBLD is entitled to non-dominant status on all routes. CBLD's two affiliates, MarcaTel and Storm, both control far less than 50 percent of the local access and international transport markets in the countries in which they operate. Accordingly, both MarcaTel and Storm lack sufficient market power to affect competition adversely in the U.S. market.

(n) CBLD certifies, by signature to this Application, that it has not agreed to accept special concessions directly or indirectly from any foreign carrier or administration with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future.

(o) Additionally, CBLD certifies, pursuant to 47 C.F.R. §1.2002, that neither CBLD nor any other party to this Application is subject to a denial of any federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. See 21 U.S.C. § 853a.

(p) This Application qualifies for streamlined processing pursuant to Section 63.12(c)(1)(i) of the Commission's Rules because CBLD's foreign affiliates, MarcaTel and Storm, control far less than 50 percent of the relevant international transport and local markets, and thus CBLD qualifies for a presumption of non-dominance on all international routes pursuant to 47 C.F.R. § 63.10(a)(3).

I. CONCLUSION


For the reasons set out above, CBID requests that the Commission promptly grant this Application for global authority to provide international facilities-based and resale services.

Dated: February 4, 2000

Respectfully submitted,

CINCINNATI BELL LONG DISTANCE INC.

By:


Christopher J. Wilson

Alfred M. Mamlet
Colleen A. Sechrest
STEPTOE & JOHNSON LLP
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036

**Counsel for Cincinnati Bell
Long Distance Inc.**