

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: \_\_\_\_\_

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READ INSTRUCTIONS CAREFULLY  
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION

REMITTANCE ADVISE **FOR MELLOW**

SPECIAL USE FEB 14 2000

APPROVED BY OMB 3060-0589

(1) LOCKBOX # 358115

PAGE NO. 1 OF 1

FCC USE ONLY

SECTION A - PAYER INFORMATION

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card) **Coudert Brothers** (3) TOTAL AMOUNT PAID (dollars and cents) **780.00**

(4) STREET ADDRESS LINE NO. 1 **1627 I Street, N.W., Suite 1200**

(5) STREET ADDRESS LINE NO. 2

(6) CITY **Washington** (7) STATE **D.C.** (8) ZIP CODE **20006**

(9) DAYTIME TELEPHONE NUMBER (include area code) **202-736-1814** (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) **BroadBand Office Communications, Inc.**

(12) STREET ADDRESS LINE NO. 1 **2900 Telearstar Court**

(13) STREET ADDRESS LINE NO. 2

(14) CITY **Falls Church** (15) STATE **VA** (16) ZIP CODE **22042-1206**

(17) DAYTIME TELEPHONE NUMBER (include area code) **703-205-5660** (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 (24A) FCC CODE 2

(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 (24B) FCC CODE 2

(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 (24C) FCC CODE 2

(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 (24D) FCC CODE 2

SECTION D - TAXPAYER INFORMATION (REQUIRED)

(25) PAYER TIN **0131614343** (26) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-11 IS DIFFERENT FROM PAYER NAME IN A-2  
APPLICANT TIN **0943329031**

SECTION E - CERTIFICATION

(27) CERTIFICATION STATEMENT  
**I, Janet Hernandez** (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

SECTION F - CREDIT CARD PAYMENT INFORMATION

(28) MASTERCARD/VISA ACCOUNT NUMBER: \_\_\_\_\_ EXPIRATION DATE: \_\_\_\_\_

MASTERCARD

MONTH YEAR

VISA AUTHORIZED SIGNATURE DATE

I hereby authorize the FCC to charge my VISA or MASTERCARD for the service(s)/authorization(s) herein described.

SEE PUBLIC BURDEN ESTIMATE ON REVERSE

FCC FORM 159 JULY 1997 (REVISED)

081054390

MEMO

Filing fee

⑈010937⑈ ⑆256020115⑆

⑈37600347⑈

*David E. Cooper*

**COUDERT BROTHERS WASHINGTON OFFICE**

1627 I STREET NW, SUITE 1200  
WASHINGTON, D.C. 20006

**CITIBANK, F.S.B.**  
WASHINGTON, DC 20036-0967  
15-7011-2540

2/14/2000

\$\*\*780.00

PAY TO THE Federal Communications Comm.  
ORDER OF  
Seventy Eight and 00/100\*\*\*\*\*

DOLLARS

10937

Security features included. Details on back.

# COUDERT BROTHERS

ATTORNEYS AT LAW

1627 I STREET, NW,  
WASHINGTON, D.C. 20006  
TEL: 202 775-5100 FAX: 202 775-1168

February 14, 2000

## Via Courier

NEW YORK	JAKARTA
PARIS	HO CHI MINH CITY
WASHINGTON	HANOI
LONDON	BERLIN
BRUSSELS	DENVER
HONG KONG	ST. PETERSBURG
SINGAPORE	MONTREAL
SAN FRANCISCO	ALMATY
BEIJING	PALO ALTO
SYDNEY	MEXICO CITY
LOS ANGELES	ASSOCIATED OFFICE
SAN JOSE	RIOS FERRER Y
TOKYO	GUILLÉN-LLARENA, S.C.
MOSCOW	BUDAPEST
BANGKOK	ASSOCIATED OFFICE
	NAGY ÉS TRÓCSÁNYI
	ÜGYVÉDI IRODA

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: BroadBand Office Communications, Inc.;  
Application for Section 214 Authorization

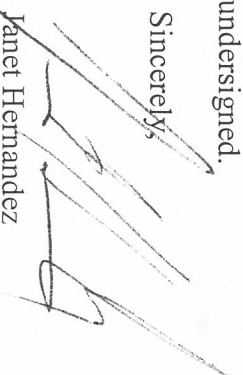
Dear Ms. Salas:

On behalf of BroadBand Office Communications, Inc. and pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214 (1999), please find enclosed an original plus six copies of BroadBand Office Communications, Inc.'s Application for Section 214 Authorization. A completed FCC Form 159 as well as a check in the amount of \$780.00, payable to the "Federal Communications Commission", are also enclosed.

Please file-stamp and return the extra copy of this filing in the pre-addressed, stamped envelope provided for this purpose.

Kindly direct questions regarding this matter to the undersigned.

Sincerely,



Janet Hernandez  
Elizabeth Holowinski,  
Counsel for BroadBand Office  
Communications, Inc.

Enclosures



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

In the matter of

BROADBAND OFFICE COMMUNICATIONS, INC.

Application for Authority  
Under Section 214 of the

Communications Act of 1934, as amended,  
for Global Authority to Operate as an  
International Facilities-Based and Resale Carrier

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

To: Chief, International Bureau

**APPLICATION**

BroadBand Office Communications, Inc. ("BroadBand Office Communications" or "Applicant"), hereby requests authority, pursuant to Section 214 of the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. §214, and Section 63.18 of the Federal Communications Commission's (the "Commission") Rules, 47 C.F.R. §63.18, to provide global international facilities-based and resale services between the United States and international points.

BroadBand Office Communications is a U.S. company which seeks to provide international telecommunications services. By granting this application, the Commission will serve the public interest, convenience and accessibility by promoting competition in the international services market. Competition will benefit U.S. consumers by increasing service options and lowering prices. Thus, the public interest will be served by the grant of Section 214 authority to BroadBand Office Communications.

Pursuant to Section 63.18 of the Commission's Rules, BroadBand Office Communications

sets forth the following information in support of its request for authorization:

- (a) The name, address, and telephone number of the Applicant are:  
BroadBand Office Communications, Inc.  
951 Mariner's Island Blvd  
Suite 700  
San Mateo, CA 94404  
Telephone: 650-356-3200

- (b) BroadBand Office Communications is a corporation organized and existing under the laws of the state of Delaware.

- (c) Correspondence regarding this application should be sent to:

Mr. Woody Traylor  
Vice President  
BroadBand Office Communications, Inc.  
2900 Telestar Court  
Falls Church, VA 22042-1206  
Telephone (703) 205-5660  
Facsimile (703) 205-5666

with a copy to:

Tara Giunta, Esq.  
Janet Hernandez, Esq.  
Coudert Brothers  
1627 I Street, N.W. Suite 1200  
Washington, D.C. 20006  
Telephone: (202) 736-1809  
Facsimile: (202) 775-1168

- (d) BroadBand Office Communications has not received authority previously under Section 214 of the Communications Act.
- (e) BroadBand Office Communications requests global international facilities-based and resale authority pursuant to terms and conditions of Section 214 of the Act and

Sections 63.18(e)(1) and (e)(2) of the Commission's Rules.

- (f) All authorities sought by BroadBand Office Communications in this application are subject to streamlined processing by the Commission.
- (g) Not applicable.

- (h) BroadBand Office Communications is not affiliated with any foreign carrier or any facilities-based United States carrier, as defined in Section 63.18(h)(1) of the Commission's Rules. In support of this certification, the name, address, citizenship and principal business of the sole shareholder that controls ten (10) percent or more of BroadBand Office Communications is as follows:

Name: BroadBand Office, Inc.  
Address: 951 Mariner's Island Blvd  
Suite 700  
San Mateo, CA 94404  
Telephone: 650-356-3200  
Citizenship: United States  
Principal Business: Communications  
Ownership Interest: 100%

As indicated above, BroadBand Office Communications is a wholly-owned subsidiary of BroadBand Office, Inc. The name, address, citizenship and principal business of the shareholders that control ten (10) percent or more of BroadBand Office, Inc. are as follows:

Name: KPCB Holdings, Inc.  
Address: 2750 Sand Hill Road  
Menlo Park, CA 94025  
Telephone: (650) 233-2750  
Citizenship: United States  
Principal Business: Venture Capital Firm  
Ownership Interest: 25.806%

Name: Crescent Real Estate Equities Limited Partnership  
Address: 777 Main Street, Suite 2100  
Ft. Worth, TX 76102  
Telephone: (817) 321-2100  
Citizenship: United States  
Principal Business: Real Estate  
Ownership Interest: 10.254%

BroadBand Office Communications has no interlocking directorates.

- (i) BroadBand Office Communications certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier 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.

- (j) BroadBand Office Communications 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, 21 U.S.C. §853a.

- (k) Not applicable.

In conclusion, BroadBand Office Communications certifies that all of the information contained in this application is accurate. For the reasons set forth herein, Applicant respectfully requests that the Commission grant the instant application following streamlined processing.



Respectfully submitted,



Mr. W. Body Traylor  
Vice President  
BroadBand Office Communications, Inc.  
2900 Telestar Court  
Falls Church, VA 22042-1206  
Telephone (703) 205-5660

Its Attorney

Tara Giunta, Esq.  
Janet Hernandez, Esq.  
Coudert Brothers  
1627 I Street, N.W. Suite 1200  
Washington, D.C. 20006  
(202) 736-1809

Date: February 14, 2000

**CERTIFICATE OF SERVICE**

I, Lynn Kimmel, a legal assistant with Coudert Brothers, hereby certify that I have caused copies of the foregoing Application to be served this 14<sup>th</sup> day of February, 2000, by first class mail, postage prepaid, on the following:

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

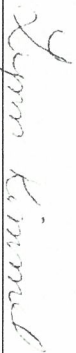
National Telecommunications and  
Information Administration  
Office of the Chief Counsel  
14<sup>th</sup> and Constitution Avenue, N.W.  
Room H4713  
Washington, D.C. 20320

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

Rebecca Arbogast  
Chief, Telecommunications Division  
International Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Room 6-A761  
Washington, D.C. 20554

U.S. Coordinator and Director  
Office of International Communications  
Policy (EB-TD)  
Department of State  
21<sup>st</sup> and C Streets, N.W.  
Washington, D.C. 20305-2000  
Attn: Code 15

Chief Regulatory Counsel  
Defense Communications Agency  
Washington, D.C. 20305-2000  
Attn: Code 115

  
\_\_\_\_\_  
Lynn Kimmel