

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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15-122/540  
00216

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MARY FRANCES VITO  
C/O SPRINT  
1850 M ST., N.W., STE. 1110  
WASHINGTON, D.C. 20036

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PAID TO THE  
ORDER OF

F.C.C.

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*Seven hundred eighty two and no/100*

**SPRINT**

First Union National Bank  
Washington, DC

*FOR 2214 TO CASH*

*Mary Frances Vito*

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**James W. Hedlund**  
Senior Attorney  
Federal Regulatory Affairs

601 19th Street, Northwest, Suite 600  
Washington, D.C. 20004  
Voice: 202 585 1910  
Fax: 202 585 1897  
james.w.hedlund@nml.sprint.com

March 2, 2000

Federal Communications Commission  
International Bureau - Telecommunications  
P.O. Box 358115  
c/o Mellon Bank  
Three Mellon Bank Center  
525 William Penn Way  
27<sup>th</sup> Floor, Room 153-2713  
Pittsburgh, PA 15259-0001

Attention: Wholesale Lock box Shift Supervisor

VIA COURIER

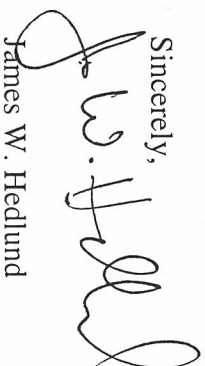
Dear Sir or Madam:

Sprint Communications Company L.P. ("Sprint") hereby applies pursuant to Section 214 of the Communications Act of 1934, as amended, and Section 63.18 of the Commission's Rules, for authority to lease and operate additional satellite facilities for service between the United States and Cuba.

Our draft in the amount of \$780.00 for the applicable fee (Payment Type Code CUT) and a completed FCC Remittance Advice (Form 159) are enclosed. Kindly stamp the return copy of the application for our files.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



James W. Hedlund

c: Rebecca Arbogast, FCC  
J. Breck Blalock, FCC  
Jack Deasy, FCC  
Frances Eisenstein, FCC  
Hal Grigsby, State Dept.  
R. Richard Newcomb, Treasury Dept.





Commerce, and State in implementing the Cuban Democracy Act with respect to telecommunications between the United States and Cuba.

## **II. INFORMATION PROVIDED PURSUANT TO THE STATE DEPARTMENT LETTER**

Pursuant to the letter, Sprint states as follows. First, the proposed facilities will be operational within a year. Second, the facilities requested herein are necessary for, and limited to, the delivery of a signal to an international telecommunications gateway in Cuba. Third, because these are private line circuits, there are no settlement payments; Sprint and its correspondent will each provide and bear the cost of matching half circuits and connecting facilities. Fourth, the proposed service will use a mode of communication (INTELSAT satellite) already in place between the United States and Cuba. Specifically, Sprint will provide international private line services by interconnecting with an authorized earth station in Franklin, New Jersey (FRN-03A) that will communicate with the INTELSAT AOR satellite at 335.5° E.L. Last, Sprint already has the necessary licenses from the Treasury Department and the Department of Commerce to provide this service under its authorization in File No. ITC 94-247.

The proposed services are already covered by Sprint's existing agreement with its correspondent, a copy of which has been supplied previously to the Commission. Sprint also attaches to this application a sworn statement by Jorge Perez-Ponce, International Manager of Sprint Communications Company L.P., stating that the foreign correspondent, Empresa de Telecomunicaciones de Cuba, S.A. ("ETECSA"), has agreed to activate the proposed circuit on the Cuban end. Copies of these documents have been provided to the U.S. Departments of State and Treasury.

### III. INFORMATION PROVIDED PURSUANT TO SECTION 63.18 OF THE COMMISSION'S RULES

Pursuant to section 63.18 of the Commission's Rules, Sprint provides the following information:

(a) The name and address and telephone number of the applicant is:

Sprint Communications Company L.P.  
Leon M. Kestenbaum, Esq.  
Vice President  
401 9<sup>th</sup> Street, N.W., Suite 400  
Washington, DC 20004  
(202) 585-1900

(b) Sprint is a limited partnership organized and existing under the laws of Delaware and is a common carrier subject to the Communications Act of 1934, as amended.

(c) All correspondence concerning this application should be addressed to:

James W. Hedlund, Esq.  
Senior Attorney  
401 9<sup>th</sup> Street, N.W., Suite 400  
Washington, DC 20004  
(202) 585-1910

(d) Sprint has previously received authority under Section 214 on many different occasions for multiple services. These authorizations are a matter of record with the Commission and include the right to provide international switched and private line services on a facilities basis. In particular, Sprint has existing authority to provide service directly to Cuba pursuant to authority granted in File No. ITC-214-19990316-00141, DA 99-903 (rel. May 17, 1999); File No. ITC-214-19981021-00739, DA 99-227 (rel. Jan. 26, 1999); and WilTel International, Inc., et al., File No. ITC 94-247, DA 94-1098, (rel. Oct. 5, 1994).



(e)(6) Sprint seeks authority to upgrade an authorized private line circuit from 256 Kbps to 2 Mbps in order to provide additional private line services. Sprint will use its own facilities to connect with an authorized earth station in Franklin, New Jersey (FRN-03A) that will communicate with the INTELSAT satellite at 335.5 degrees E. latitude. As mentioned above, the proposed services are already covered by Sprint's existing agreement with ETECSA, a copy of which is on file with the Commission.

(g) The authorization requested is categorically excluded from environmental processing under section 1.1306 of the Rules because it does not involve any of the categories listed in subsections 1.1306(b)(1)-(3). Accordingly, no environmental information need be submitted with this Application.

(h)(1) Sprint is affiliated with Global One, the global partnership formed by Sprint, France Telecom (FT) and Deutsche Telekom (DT). Global One's affiliates have ownership interests in international facilities in the U.K., Sweden, Norway, Finland, Denmark, the Netherlands, Australia, El Salvador, Guatemala, and New Zealand, each of which is or will be a new carrier in their respective countries.<sup>1</sup> Sprint is also affiliated with Call-Net, a Canadian holding company with a subsidiary that does business in Canada as Sprint Canada and which recently acquired the nondominant U.S. carrier FONOROLA; Barak, a new entrant in Israel's communications market; and Tianjin Global Communications Company, which is a new entrant that provides local service in China on

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<sup>1</sup> Sprint has reached a definitive agreement with Deutsche Telekom and France Telecom to sell Sprint's interest in Global One. See Sprint Press Release, "Sprint Reaches Agreement to Sell Stake in Global One Venture to France Telecom and Deutsche Telekom," January 26, 2000, available at <http://www3.sprint.com/Stemp/press/releases/200001/200001260937.html>.



a limited basis. Each of these entities is a new entrant in its respective market, has no market power, and no ability to discriminate against unaffiliated United States carriers. Sprint is not a foreign carrier in Cuba, does not control, and is not affiliated with, its correspondent ETESCA, the only carrier in Cuba.

(h)(2) FT and DT each have a 10 percent equity ownership interest in Sprint. FT is a provider of telecommunications services and is organized under the laws of France. Its headquarters is located at 6 place d'Alleray, 75505 Paris, France. DT is a provider of telecommunications services organized under the laws of the Federal Republic of Germany. Its headquarters is located at Godesberger Allee, D-53175, Bonn, Germany. Mr. Michel Bon, Chairman of France Telecom, and Dr. Ron Sommer, Chairman of the board of management of DT, are directors of Sprint Corporation, Sprint's parent.

(i) Sprint certifies that it has not agreed to accept special concessions directly or indirectly from ETESCA with respect to the U.S.-Cuba or any other route and will not enter into such agreements in the future.

(j) Sprint certifies that its general partner and limited partners are not subject to denial of federal benefits, including FCC benefits, under Sections 1.2001-1.2003 of the Commission's Rules and the Anti-Drug Abuse Act of 1988.

(k) Sprint requests streamlined processing of this application under Section 63.12 to the extent possible under Public Notice I-6831.

#### **IV. PUBLIC INTEREST STATEMENT**

Sprint's request for an upgrade of an existing private line circuit is consistent with the goals of the Cuban Democracy Act ("CDA"), the regulatory framework established in the Letter, and the Commission's Section 214 public interest standard. Section 1705(e)(2)

of the CDA, 22 U.S.C. §6004(e)(2), requires the authorization of facilities "in such quantity and of such quality as may be necessary to provide efficient and adequate telecommunications services between the United States and Cuba." Sprint's authorized private line facilities on the U.S.-Cuba route are no longer sufficient to provide adequate and efficient services or otherwise meet its customers' needs. In addition, multiple U.S. carriers compete in the provision of service to Cuba. A grant of this application will further the Commission's pro-competitive policies and thus serve the public interest.

Respectfully submitted,

SPRINT COMMUNICATIONS COMPANY L.P.



James W. Hedlund  
401 9<sup>th</sup> Street, N.W., Suite 400  
Washington, DC 20004  
(202) 585-1910

Its Attorney

March 2, 2000



AFFIDAVIT

1. I, Jorge M. Perez Ponce, state that I am an International Manager of Sprint Communications Company L.P. ("Sprint"). My business address is 12120 Sunset Hills Road, Reston, Virginia. I am making this affidavit in conjunction with an application by Sprint with the Federal Communications Commission to upgrade from 256 Kbps to 2 Mbps an existing private line circuit between an authorized earth station in Franklin, New Jersey (FRN-03A) and an INTEL SAT Atlantic Ocean Region Satellite (335.5° E. latitude), together with the necessary connecting facilities.

2. I have read the Section 214 application of Sprint, and the facts stated therein, except those facts of which official notice may be taken by the Commission, are true and correct to the best of my knowledge and belief.

3. I understand that the Executive Branch's general policy guidelines regarding proposals for telecommunications between the United States and Cuba require applicants to submit a sworn statement that the Cuban telecommunications entity agrees to activate the circuits and facilities proposed by applicants.

4. Empresa de Telecomunicaciones de Cuba ("ETECSA"), Sprint's foreign correspondent, has agreed to jointly activate and operate the requested facilities with Sprint for the provision of international private line services. This agreement was

reached at a meeting between Sprint and ETECOSA on February 15, 2000.

By:



Jorge M. Pérez Ponce  
International Regional Manager  
Sprint Communications Company L.P.

Subscribed and sworn to before me this 1 day of March, 2000.



Notary Public

My Commission Expires:

My Commission Expires February 29, 2001