

Categories of Services for 214 Applications
(Streamlined/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: _____

FBI

COPY

FCC/MELTON
MAR 08 2000

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

In the Matter of)
)
Pyramid Communications, Inc.)
)
) File No. _____
Application for Authority Pursuant)
to Section 214 of the Communications)
Act of 1934, as Amended, to Operate as an)
International Resale Carrier)
)

APPLICATION

Pyramid Communications, Inc. (“Pyramid”) hereby requests authority pursuant to Section 214 of the Communications Act of 1934, as amended, 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 resell the international telecommunications services of other common carriers between the United States and various international points.

Pyramid is incorporated under the laws of the state of Delaware. Pyramid intends to resell the international telecommunications facilities of other common carriers and to offer international basic switched and private line services, including both voice and data transmission services. Pyramid is not a facilities-based carrier. The international resale service will include pre-subscribed, dial-around and/or pre-paid calling card service for residential and business customers. Pyramid will allow these customers to initiate calls from locations within the United States to other countries, and will offer customers the ability to terminate calls from foreign locations to served locations in the United States. Although Pyramid requests global resale authority, it initially intends to focus on the provision of telecommunications services to and

from central and south Asian countries including India, Bangladesh, Sri Lanka and Turkmenistan.

The provision of international service by Pyramid will not have a significant impact on the general provision of such service to the public. However, additional competition in the market, with the entry of Pyramid, will benefit consumers of international telecommunications services. Specifically, the benefits of competition include lower prices, greater consumer choice among service providers and the availability of a wider variety of service options. Consequently, the grant of this authorization is consistent with the public interest.

In support of this request for authorization, the following information is submitted pursuant to Section 63.18 of the Commission's rules, 47 C.F.R. § 63.18:

(a) The name of the applicant is Pyramid Communications, Inc. Its address and telephone number are:

1350 Beverly Road
Suite 115-121
McLean, VA 22101
Telephone: (703) 749-2238

(b) Pyramid is incorporated under the laws of the state of Delaware.

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

Mr. Javed S. Khan
1350 Beverly Road
Suite 115-121
McLean, VA 22101
Telephone: (703) 749-2238
Fax: (703) 749-0993
E-mail: jskhan@usa.net

as well as:

J.G. Harrington, Esq.
Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036
Telephone: (202) 776-2758
Facsimile: (202) 776-2222
E-Mail: jharrington@dlalaw.com

- (d) Pyramid has never sought or received any previous authorization to provide international telecommunications services pursuant to Section 214 of the Act.
 - (e) Pyramid requests Section 214 authority to operate as a resale carrier pursuant to Section 63.18(e)(2) of the Commission's rules. Specifically, Pyramid is applying for authority to resell the international services of authorized U.S. common carriers for the provision of international basic switched and private line services to all international points. Pyramid certifies that it will comply with the terms and conditions contained in Sections 63.21 and 63.23 of the Commission's rules.
 - (g) Not applicable for resale applications.
 - (h) Persons or entities holding a ten percent or greater interest in Pyramid Communications, Inc., and the percentage of equity interest held by each are as follows:

Mr. Javed S. Khan	750 shares, 75%
1350 Beverly Road	
Suite 115-121	
McLean, VA 22101	
- citizenship: Pakistani (U.S. permanent resident)
- principal business: Mr. Khan is Chairman of the Saif Group of Companies, a highly diversified industrial and services group in Pakistan.

250 shares, 25%

Omar Khan
1350 Beverly Road
Suite 115-121
McLean, VA 22101

citizenship: Pakistani (U.S. permanent resident)
principal business: self-employed

- (i) Pyramid certifies that it is not a foreign carrier and that it is not affiliated with any foreign carrier.
- (j) Pyramid does not seek to provide international telecommunication services to any destination country for which any statement contained in Section 63.18(j)(1)-(4) of the Commission's rules is true.
- (n) Pyramid 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 market power on the foreign end of the route and that it will not enter into such agreement in the future.
- (o) Pyramid certifies that neither Pyramid nor any party to this application is subject to the denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853a.
- (p) Pyramid requests streamlined processing of its application. Pyramid qualifies for streamlined processing under Section 63.12 of the Commission's rules because none of the exclusionary factors contained in Section 63.12(c) is applicable to Pyramid's application or circumstances. Specifically, Pyramid is not affiliated with a foreign carrier in a destination market, is not affiliated with a dominant U.S. carrier whose international switched or private line services Pyramid seeks authority to resell directly or indirectly,

and does not seek to provide switched basic service over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines.

Conclusion

Based on the foregoing, Pyramid asserts that the public interest, convenience and necessity would be furthered by a grant of this Section 214 application. Accordingly, Pyramid respectfully requests that the Commission grant this application for Section 214 authorization for Pyramid to provide international resale services.

Respectfully submitted,

PYRAMID COMMUNICATIONS, INC.



Javed S. Khan
Pyramid Communications, Inc.

Raymond G. Bender, Jr., Esq.
J.G. Harrington, Esq.
Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036
(202) 776-2000

Its Attorneys

February 29, 2000

READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE

APPROVED BY OMB 3060-0589

(1) LOCKBOX # 358115

PAGE NO. 1 OF 1

SPECIAL USE
FCC USE ONLY

SECTION A - PAYER INFORMATION

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card)
Dow, Lohnes & Albertson, PLLC (3) TOTAL AMOUNT PAID (dollars and cents) **780.00**
(4) STREET ADDRESS LINE NO. 1
1200 New Hampshire Avenue, NW
(5) STREET ADDRESS LINE NO. 2

(6) CITY **Washington** (7) STATE **DC** (8) ZIP CODE **20036**
(9) DAYTIME TELEPHONE NUMBER (include area code) **(202) 776-2058** (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)
Pyramid Communications, Inc.
(12) STREET ADDRESS LINE NO. 1
1350 Beverly Road
(13) STREET ADDRESS LINE NO. 2
Suite 115-121
(14) CITY **McLean** (15) STATE **VA** (16) ZIP CODE **22101**
(17) DAYTIME TELEPHONE NUMBER (include area code) **(703) 749-2238** (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 **Section 214** (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 **0530186774** (26) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-11 IS DIFFERENT FROM PAYER NAME IN A-2
APPLICANT TIN **0541965796**

SECTION E - CERTIFICATION

(27) CERTIFICATION STATEMENT
David Martin, (PRINT NAME) **David Martin**, 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 *David Martin*

SECTION F - CREDIT CARD PAYMENT INFORMATION

(28) MASTERCARD/VISA ACCOUNT NUMBER:
EXPIRATION DATE: MONTH YEAR
MASTERCARD VISA AUTHORIZED SIGNATURE

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

Dow, Lohnes & Albertson, PLLC

1200 New Hampshire Avenue, N.W., SUITE 800
Washington, D.C. 20036
(202) 776-2000

FIRST UNION NATIONAL BANK

WASHINGTON, D.C. 20036
15-122
00480

94803

Date: February 18, 2000

Pay: Seven hundred eighty and 00/100***** \$ 780.00***

VOID AFTER 6 MONTHS

Federal Communications Commission

A. S. Finau

TWO SIGNATURES REQUIRED FOR AMOUNTS OVER \$5,000.00

PAY TO THE ORDER OF:

THE REVERSE SIDE OF THIS DOCUMENT INCLUDES AN ARTIFICIAL WATERMARK - HOLD AT AN ANGLE TO VIEW

⑈094803⑈ ⑆054001220⑆2086700434109⑈