

Categories of Services F
(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

see to do

Description of Application:

None
All parts except

FB1



FCC/MELLON MAR 15 2000

15 March, 2000

Grier C. Raclin, Esq.
Senior Vice President,
External Affairs;
General Counsel; and
Corporate Secretary

By Hand Delivery

Global TeleSystems Group, Inc.
4121 Wilson Boulevard
8th Floor
Arlington, VA 22203 USA
Tel: 703 236 3710
Fax: 703 236 3605

Magalie Roman Salas, Secretary
Federal Communications Commission
International Bureau - Telecommunications
P.O. Box 358115
Pittsburgh, PA 15251-5115

**Re: Application of GTS Carrier Services, Inc. Under Section 214 of the
Communications Act of 1934, as amended, for Authority to Provide
Facilities-Based and Resale Services to Certain International Points**

Dear Ms. Salas,

Enclosed for filing, on behalf of GTS Carrier Services, Inc. (hereinafter the "Applicant"), are an original and five copies of an application for authorization pursuant to Section 214 of the Communications Act of 1934, as amended, and Section 63.18(e)(1)-(2) of the Commission's Rules, 47 C.F.R. § 63.18(e)(1)-(2). The Applicant seeks Commission authority to provide global facilities-based and resale switched, private line, data, television and business services between the United States and all international points except Russia.

Also enclosed is a completed Form 159 and a check payable to the FCC in the amount of \$780.00 to cover the filing fee. This request for authorization is subject to the Commission's streamlined processing rules.

Questions concerning this application should be addressed to:

Donald Connor
Senior Regulatory Advisor
Terhulpssesteenweg 6A
1560 Hoeilaart
Belgium

Telephone: 011-32-2-658-52-16
Facsimile: 011-32-2-658-51-10
Email: Donald.Connor@herten.com


and

Joel Winnik
Hogan & Hartson L.L.P.
Columbia Square
555 Thirteenth Street, N.W.
Washington, DC. 20004-1109

Telephone: 1-202-637-5600
Facsimile: 1-202-637-5910

Respectfully submitted,

GTS Carrier Services, Inc.

By: 
Grier C. Raclin
Vice President and Corporate Secretary

Enclosures

reduce dominant carriers' ability to exercise market power between their country and the United States. In light of the above, grant of the instant application is in the public interest.

Section 63.18 Information

The following information is provided by the Applicant as required by Section 63.18 of the Commission's Rules, 47 C.F.R. § 63.18.

(a) Name, Address and Telephone Number of Applicant

GTS Carrier Services, Inc.
4121 Wilson Blvd, 8th Floor
Arlington, Virginia 22203

Telephone: 1-703-236-3710

(b) Place of Incorporation

GTS Carrier Services, Inc., is a business corporation organized under the laws of the state of Delaware.

(c) Contact Points

Correspondence concerning this application should be addressed to:

Donald Connor
Senior Regulatory Advisor
Tehulpseesteenweg 6A
1560 Hoeilaart
Belgium

Telephone: 011-32-2-658-52-16
Facsimile: 011-32-2-658-51-10
Email: Donald.Connor@herren.com

With a copy of all such correspondence to:

Joel Winnik
Hogan & Hartson L.L.P.
Columbia Square
555 Thirteenth Street, N.W.
Washington, DC. 20004-1109

Telephone: 1-202-637-5600
Facsimile: 1-202-637-5910

(d) Section 214 Authorizations

The Applicant has not received authority previously under Section 214 of the Communications Act.

(e) Requested Authorizations

The Applicant is herein requesting authority to:

- (1) operate as facilities-based international carrier in order to provide international basic switched, private line, data, television and business services to all international points except Russia pursuant to the terms and conditions of Section 63.21 and 63.22 of the Commission's Rules, 47 C.F.R. § 63.21 and 63.22; and
- (2) resell the international services of authorized U.S. common carriers for the provision of international basic switched, private line, data, television and business services to all international points except Russia pursuant to the terms and conditions of Section 63.21 and 63.22 of the Commission's Rules, 47 C.F.R. § 63.21 and 63.22.

(f) At this time, the Applicant does not seek other authorizations available under Section 63.18(e) of the Commission's Rules, 47 C.F.R. § 63.18(e).

(g) Environmental Statement
Not Applicable.

(h) Ten Percent or Greater Shareholders and Interlocking Directorates

The name, address, citizenship and principal business of the Applicant's 10% or greater direct shareholder is as follows:

Shareholder Name/Address	Direct Interest Held in the Applicant	Citizenship	Principal Business
GTS European Telecommunications, Corp. 4121 Wilson Blvd, 8 th Floor Arlington, Virginia 22203	100%	Delaware	Holding Company

The name, address citizenship and principal business of the GTS European Telecommunications Corporation's (hereinafter "GTEC") direct shareholder that has a 10% or greater indirect interest in the Applicant is as follows:

Shareholder Name/Address	Percentage Held in GTEC	Citizenship	Principal Business
Global TeleSystems Group, Inc. 4121 Wilson Blvd, 8 th Floor Arlington, Virginia 22203	100%	Delaware	Holding Company

The name, address citizenship and principal business of Global TeleSystems Group, Inc.'s (hereinafter "GTSG") 10% or greater direct shareholder is set forth below:

Shareholder	Percentage Held in GTSG *	Citizenship	Principal Business
AXA Assurances Mutuelle 9 Place Vendome 7501 Paris France	20.21%	France	Insurance

* Percentage stakes represents holdings of several separately managed funds and are based on filings to the Securities and Exchange Commission.

Robert J. Amman and Grier C. Raclin are directors of GTS Carrier Services, Inc., and Global TeleSystems Europe BV. Grier C. Raclin is a director of GTS Carrier Services, Inc., and C-Datacom International, Inc.

(i) Foreign Countries in which the Applicant is or, or is Affiliated with a Foreign Carrier

The Applicant certifies that it is not a foreign carrier in any foreign country, within the meaning of Section 63.18(j)(1) of the Commission's Rules, 47 C.F.R. § 63.18(j)(1).

The Applicant certifies that it controls foreign carriers, within the meaning of Section 63.18(j)(2) of the Commission's Rules, 47 C.F.R. § 63.18(j)(2), in Austria, Belgium, Czech Republic, Denmark, Finland, France, Germany, Italy, Luxembourg, Norway, Spain, Sweden, Switzerland, the Netherlands, and the United Kingdom.

The Applicant certifies that it is affiliated with foreign carriers, within the meaning of Section 63.18(j)(3) of the Commission's Rules, 47 C.F.R. § 63.18(j)(3), in Czech Republic, Belgium, France, Germany, Hungary, India, Ireland, Italy, Kazakhstan, Luxembourg, Norway, Poland, Romania, Russia, Slovak Republic, Spain, Sweden, Switzerland, the Netherlands, Ukraine and the United Kingdom.

The Applicant certifies that it does not have any foreign carrier affiliations within the meaning of Section 63.18(j)(4) of the Commission's Rules, 47 C.F.R. § 63.18(j)(4).

(j) Destination Countries for which this Authorization is Requested and the Applicant is, or is Affiliated with a Foreign Carrier

As previously stated, this application is submitted in order to authorize the Applicant to provide global facilities-based and resale switched, private line, data, television and business services between the United States and all international points except Russia.

The Applicant controls foreign carriers, within the meaning of Section 63.18(j)(2) of the Commission's Rules, 47 C.F.R. § 63.18(j)(2), in Austria, Belgium, Czech Republic, Denmark, Finland, France, Germany, Italy, Luxembourg, Norway, Spain, Sweden,

Switzerland, the Netherlands, and the United Kingdom. The Applicant certifies that the following foreign carriers are controlled by it:

Foreign Carrier	Foreign Country	Principal Business
GTS Europe BV ¹	Austria, Belgium, Denmark, Finland, France, Germany, Italy, Luxembourg, Norway, Spain, Sweden, Switzerland, the Netherlands, and the United Kingdom	Carriers' Carrier
GTS Carrier Services (Czech) s.r.o.	Czech Republic	International Carriers' Carrier
GTS Finland OY	Finland	Voice Telephony
Interaktieve Media Services BV	Netherlands	International and National Long Distance
Global TeleSystems (Austria) GmbH ²	Austria	Local Access Services
Global TeleSystems (Nederland) BV ³	Belgium, Netherlands	International and National Long Distance Services
Global TeleSystems (Norge) AS ⁴	Norway	Voice Telephony
Global TeleSystems (Denmark) AS	Denmark	Voice Telephony
FLAG Atlantic (France) SARL ⁵	France	Transatlantic Capacity
FLAG Atlantic (UK) Ltd.	United Kingdom	Transatlantic Capacity

The Applicant certifies that it is affiliated with foreign carriers, within the meaning of Section 63.18(j)(3) of the Commission's Rules, 47 C.F.R. § 63.18(j)(3), in Czech Republic, Belgium, France, Germany, Hungary, India, Ireland, Italy, Kazakhstan, Luxembourg, Norway, Poland, Romania, Russia, Slovak Republic, Spain, Sweden, Switzerland, the Netherlands, Ukraine and the United Kingdom. The Applicant certifies that the following foreign carriers are affiliated, within the meaning of Section 63.18(j)(3) of the Commission's Rules, 47 C.F.R. § 63.18(j)(3), with it:

Foreign Carrier	Foreign Country	Principal Business
Global TeleSystems (Belgium) S.A.	Belgium	Voice Telephony
GTS Benelux BV ⁶	Netherlands	Voice Telephony
WestCom fur Telekommunikation GmbH	Germany	Value Added Services
GTS Benelux SARL	Luxembourg	Voice Telephony

¹ Formerly Hermes Europe Railtel BV

² Formerly GTS Access Services (Vienna) GmbH

³ Formerly Esprit Telecom Benelux BV

⁴ Formerly GTS Business Services (Norway) AS

⁵ FLAG Atlantic (France) SARL has applied for a telecommunications license in France, and is expected to be granted a telecommunications license in France by the second quarter of 2000

⁶ Formerly Nelsource Telecom Benelux BV

GTS Business Services (Ireland) Ltd. ⁷	Ireland	Voice Telephony
Global TeleSystems (UK) Limited ⁸	United Kingdom	International and National Long Distance Services
Global TeleSystems (Deutschland) GmbH ⁹	Germany	International and National Long Distance Services
Global TeleSystems Netzwerk GmbH Co. KG ¹⁰	Germany	International and National Long Distance Services
Global TeleSystems (España) SA ¹¹	Spain	International and National Long Distance Services in Gerona, Madrid and Barcelona
Esprit Telecom France SA	France	International and National Long Distance Voice Telephony
GTS Italia Srl ¹²	Italy	Voice Telephony
GTS Omnicom S.A. ¹³	France	Voice Telephony
GTS Access Services (Switzerland) SA	Switzerland	Local Access
GTS Business Services (UK) Ltd.	United Kingdom	Domestic Value Added Services and International Voice
Global TeleSystems (Sverige) AB ¹⁴	Sweden	Voice Telephony and Mobile
GTS-Hungary Telecommunications Ltd.	Hungary	VSAT Network, National Microwave Network and Local Access Services in Budapest
Proner Communications Sp.z.o.o. ¹⁵	Poland	International Long Distance Data Communications
ATOM SA	Poland	International and Domestic Data Services
Internet Technologies Polska Sp.Z.o.o.	Poland	Internet Access
Data Net Telecom Ltd.	Hungry	VSAT Network
Stiel-VSAT s.r.o.	Slovak Republic	VSAT Network
GTS Slovakia s.r.o.	Slovak Republic	Data Services
GTS Ince s.r.o.	Czech Republic	Internet Access
Netforce s.r.o.	Czech Republic	Internet

⁷ Formerly International Telecommunications Ltd.

⁸ Formerly Esprit Telecom UK Limited

⁹ Formerly Esprit Telecom Deutschland GmbH

¹⁰ Formerly PLUSNET GmbH Co. KG

¹¹ Formerly Esprit Telecom España SA

¹² Formerly Esprit Telecom Italia Srl

¹³ Formerly Omnicom S.A.

¹⁴ Formerly NetSource Sverige AS

¹⁵ Formerly Catalina Sp.z.o.o.

GTS CzechNet s.r.o.	Czech Republic	Data Services, VSAT Network and Leased Lines
GTS CzechCom s.r.o.	Czech Republic	Data Services
SC GTS Romania SRL	Romania	VSAT Network
Datel a.s.	Czech Republic	Domestic Public Voice and Internet Access
EDN Sovintel LLC	Russia	International Long Distance and Local Access
Vostok Mobile, B.V. ¹⁶	Russia	Basic Cellular
TeleRoss LLC ¹⁷	Russia	Domestic Long Distance, Data, and Local Access in Moscow
Sovam Teleport Kiev Division	Ukraine	Data
SA Telecom	Kazakhstan	Data
Golden Telecom	Ukraine	Voice and Data
C-Datacom International, Inc.	India	International Private Line Communications

For the Commission's convenience the Applicant is submitting a consolidated list of all Foreign Carrier Affiliates as Exhibit I.

(k) Members of the WTO and/or Lack of Market Power

Austria, Belgium, Czech Republic, Denmark, Finland, France, Germany, Hungary, India, Ireland, Italy, Luxembourg, the Netherlands, Norway, Poland, Romania, Slovak Republic, Spain, Sweden, Switzerland, and the United Kingdom are members of the World Trade Organisation. Moreover, all the affiliated foreign carriers, including Sovam Teleport Kiev Division and Golden Telecom that operates in the Ukraine and SA Telecom that operates in Kazakhstan (countries that are not members of the World Trade Organisation) do not have market power. All the affiliated foreign carriers are new market entrants and as such they do not exercise bottleneck control or market power in foreign countries in which they operate. Moreover, since these companies will be competing with incumbent service providers, customers will have a choice of service providers if these companies charge higher than market prices. Accordingly, these companies will not be able to exercise market power. Because these companies do not hold more than a fifty percent market share in the international, inter-city or

¹⁶ Vostok Mobile, B. V. is a wholly owned subsidiary of GTS. Vostok Mobile, B. V. owns between 50% and 100% of a series of cellular ventures in various regions of Russia. The telecommunications companies in which Vostok Mobile, B. V. has interests are Penza Mobile, Astrakhan Mobile, Votec Mobile, Chuvashia, Mobile, Lipetsk Mobile, Arkhangelsk Mobile Networks, Saratov Mobile, Volgograd Mobile, Murmansk Mobile Network, Parma Mobile, Unicel Bryansk, Unicel Kostroma, Unicel Orel, Unicel Yaroslavl, BashUnicel, Mar Mobile, Novgorod Telecommunications, Unicel Ivanovo, Altay

¹⁷ Sviaz and Primetelephone.
 TeleRoss LLC holds the network license and co-manages fourteen joint ventures, thirteen of which are 50% beneficially-owned by GTS, and one, TeleRoss-Irkutsk, which is 100% beneficially-owned by GTS. These fourteen joint ventures are TeleRoss-Irkutsk, TeleRoss-Ufa, TeleRoss-Novosibirsk, TeleRoss-Vladivostok, TeleRoss-Tiumen, TeleRoss-Khabarovsk, TeleRoss-Volgograd, TeleRoss-Ekaterinburg, TeleRoss-Nizhni Novgorod, TeleRoss-Arkhangelsk, TeleRoss-Veronezh, TeleRoss-Samara, TeleRoss-Komi, TeleRoss-Kubanelectrosviaz and LLC Nevatelecom.

local access markets in foreign countries in which they operate the Applicant should be regulated as a non-dominant carrier.

As previously stated the Applicant is not seeking authority to provide services to Russia.

(l) Affiliation with US Carriers

The Applicant may resell the international switched services of an unaffiliated U.S. carrier in order to provide international telecommunication services to countries where it may become a foreign carrier, or is affiliated with a foreign carrier. The Applicant's affiliated foreign carriers on the routes that the Applicant seeks to serve by virtue of the present application are not monopoly providers of telecommunication services. Moreover, all the Applicant's affiliated foreign carriers are new market entrants and as such they do not exercise bottleneck control or market power in foreign countries in which they operate. Moreover, since these companies will be competing with incumbent service providers, customers will have a choice of service providers if these companies charge higher than market prices. Accordingly, these companies will not be able to exercise market power. Because these companies do not hold more than a fifty percent market share in the international, inter-city or local access markets in foreign countries in which they operate the Applicant satisfies Section 63.10(a)(3) of the Commission's Rules, 47 C.F.R. § 63.10(a)(3).

In addition, please note that Global TeleSystems (UK) Limited (formerly Espirit Telecom (U.K.) Limited), GTS Europe BV (formerly Hermes Europe Raitel BV), GTS Carrier Services (Ireland) Limited (formerly Hermes Europe Raitel (Ireland) Limited), GTS Network (Ireland) Limited (formerly Hermes Europe Raitel (Network) Limited, GTS Network Services B.V.B.A (formerly HER Network Services B.V.B.A.) and Hermes Europe Raitel (US), Inc., which are controlled indirectly by Global TeleSystems Group. Inc., have all been classified as a non-dominant carriers under section 63.10 of the Commission's Rules, 47 C.F.R. § 63.10 on the routes that the Applicant seeks to serve by virtue of this Application.¹⁸

(m) Regulatory Classification under Section 63.10 of the Commission's Rules

As previously stated, the Applicant's foreign carrier affiliates on the routes it proposes to serve by virtue of this application are new market entrants. As such, they do not exercise bottleneck control or market power in foreign countries in which they operate. Moreover, since these companies will be competing with incumbent service providers, customers will have a choice of service providers if these companies charge higher than market prices. Accordingly, these companies will not be able to exercise market power. Because these companies do not hold more than a fifty percent market share in the international, inter-city or local access markets in foreign countries in which they operate the Applicant should be regulated as a non-dominant carrier.

In addition, please note that Global TeleSystem (UK) Limited (formerly Espirit Telecom (U.K.) Limited), GTS Europe BV (formerly Hermes Europe Raitel BV), GTS Carrier Services (Ireland) Limited (formerly Hermes Europe Raitel (Ireland) Limited),

¹⁸ See FCC File Numbers ITC T/C-19990120-00072, ITC-214-19980903-00619 and ITC-214-19990816-00577.

GTS Network (Ireland) Limited (formerly Hermes Europe Raitel (Network) Limited, GTS Network Services B.V.B.A (formerly HER Network Services B.V.B.A.) and Hermes Europe Raitel (US), Inc., which are controlled indirectly by Global Telesystems Group, Inc., have all been classified as a non-dominant carriers under section 63.10 of the Commission's Rules, 47 C.F.R. § 63.10 on the routes that the Applicant seeks to serve by virtue of this Application¹⁹

(n) No Special Concessions

GTS Carrier Services, Inc., 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 carriers possess sufficient market power on the foreign end of the route to affect competition adversely, and will not enter into any such agreements in the future.

(o) Denial of Federal Benefits

GTS Carrier Services, Inc., certifies pursuant to Section 1.2001 through 1.2003 of the Commission's Rules that no party associated with their application have been denied Federal benefits pursuant to Section 5301 of the Ant-Drug Abuse Act of 1988.

(p) Desire for Streamlined Processing

This application is eligible for streamlined processing pursuant to Section 63.12 (a) of the Commission's Rules, 47 C.F.R. §63.12(a), and in particular Section 63.12 (c)(1)(i)²⁰ and (ii)²¹, 47 CFR §63.12 (c)(1)(i) and (ii).

Conclusion

In Conclusion, GTS Carrier Services, Inc., certifies that all the information in this application is accurate and correct.

Accordingly, GTS Carrier Services, Inc., respectfully request that the Commission grant this application on a streamlined basis.

Respectfully submitted,

GTS Carrier Services, Inc.

By: 
Grier C. Racim
Vice President and Corporate Secretary

March 15, 2000

¹⁹ *Ibid.*

²⁰ *Ibid.*

²¹ See paragraph (m) above.

Exhibit I

AFFILIATED FOREIGN CARRIERS

Foreign Carrier	Foreign Country	Principal Business
GTS Europe BV ²²	Austria, Belgium, Denmark, Finland, France, Germany, Italy, Luxembourg, Norway, Spain, Sweden, Switzerland, the Netherlands, and the United Kingdom	Carriers' Carrier
GTS Carrier Services (Czech) s.r.o.	Czech Republic	International Carriers' Carrier
GTS Finland OY	Finland	Voice Telephony
Interaktieve Media Services BV	Netherlands	International and National Long Distance
Global TeleSystems (Austria) GmbH ²³	Austria	Local Access Services
Global TeleSystems (Nederland) BV ²⁴	Belgium, Netherlands	International and National Long Distance Services
Global TeleSystems (Norge) AS ²⁵	Norway	Voice Telephony
Global TeleSystems (Denmark) AS	Denmark	Voice Telephony
FLAG Atlantic (France) SARL ²⁶	France	Transatlantic Capacity
FLAG Atlantic (UK) Ltd.	United Kingdom	Transatlantic Capacity
Global TeleSystems (Belgium) S.A.	Belgium	Voice Telephony
GTS Benelux BV ²⁷	Netherlands	Voice Telephony
WestCom für Telekommunikation GmbH	Germany	Value Added Services
GTS Benelux SARL	Luxembourg	Voice Telephony
GTS Business Services (Ireland) Ltd. ²⁸	Ireland	Voice Telephony
Global TeleSystems (UK) Limited ²⁹	United Kingdom	International and National Long Distance Services
Global TeleSystems (Deutschland) GmbH ³⁰	Germany	International and National Long Distance Services
Global TeleSystems Netzwerk GmbH Co. KG ³¹	Germany	International and National Long Distance Services

²² Formerly Hermes Europe Railtel BV

²³ Formerly GTS Access Services (Vienna) GmbH

²⁴ Formerly Esprit Telecom Benelux BV

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²⁶ FLAG Atlantic (France) SARL has applied for a telecommunications license in France, and is expected to be granted a telecommunications licenses in France by the second quarter of 2000

²⁷ Formerly Netsource Telecom Benelux BV

²⁸ Formerly International Telecommunications Ltd.

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³¹ Formerly PLUSNET GmbH Co. KG

Global TeleSystems (España) SA ³²	Spain	International and National Long Distance Services in Gerona, Madrid and Barcelona
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GTS Access Services (Switzerland) SA	Switzerland	Local Access
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Proner Communications Sp.z.o.o. ³⁶	Poland	International Long Distance Data Communications
ATOM SA	Poland	International and Domestic Data Services
Internet Technologies Polska Sp.Z.o.o.	Poland	Internet Access
Data Net Telecom Ltd.	Hungry	VSAT Network
Sitel-VSAT s.r.o.	Slovak Republic	VSAT Network
GTS Slovakia s.r.o.	Slovak Republic	Data Services
GTS Ince s.r.o.	Czech Republic	Internet Access
Neiforce s.r.o.	Czech Republic	Internet
GTS CzechNet s.r.o.	Czech Republic	Data Services, VSAT Network and Leased Lines
GTS CzechCom s.r.o.	Czech Republic	Data Services
SC GTS Romania SRL	Romania	VSAT Network
Dattel a.s.	Czech Republic	Domestic Public Voice and Internet Access
EDN Sovintel LLC	Russia	International Long Distance and Local Access
Vostok Mobile, B. V. ³⁷	Russia	Basic Cellular

³² Formerly Esprit Telecom España SA

³³ Formerly Esprit Telecom Italia Srl

³⁴ Formerly Omincom S.A.

³⁵ Formerly NetSource Sverige AS

³⁶ Formerly Catalina Sp.z.o.o.

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companies in which Vostok Mobile, B. V. has interests are Penza Mobile, Astrakhan Mobile, Votec

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Mobile, Murmansk Mobile Network, Parma Mobile, Unicel Bryansk, Unicel Kostroma, Unicel Orel,

Unicel Yaroslavl, BashUnicel, Mar Mobile, Novgorod Telecommunications, Unicel Ivanovo, Altay

Sviiaz and Primatelephone.

TeleRoss LLC ³⁸	Russia	Domestic Long Distance, Data, and Local Access in Moscow
Sovam Teleport Kiev Division	Ukraine	Data
SA Telecom	Kazakhstan	Data
Golden Telecom	Ukraine	Voice and Data
C-Datacom International, Inc.	India	International Private Line Communications

³⁸ TeleRoss LLC holds the network license and co-manages fourteen joint ventures, thirteen of which are 50% beneficially-owned by GTS, and one, TeleRoss-Irkutsk, which is 100% beneficially-owned by GTS. These fourteen joint ventures are TeleRoss-Irkutsk, TeleRoss-Ufa, TeleRoss-Novosibirsk, TeleRoss-Vladivostok, TeleRoss-Tiumen, TeleRoss-Khabarovsk, TeleRoss-Volgograd, TeleRoss-Ekaterinburg, TeleRoss-Nizhni Novgorod, TeleRoss-Arkhangelsk, TeleRoss-Veronezh, TeleRoss-Samara, TeleRoss-Komi, TeleRoss-Kubanelectroviaz and LLC Nevatelecom.

CHECK NO. 246955

VENDOR: FEDERAL COMMUNICATIONS

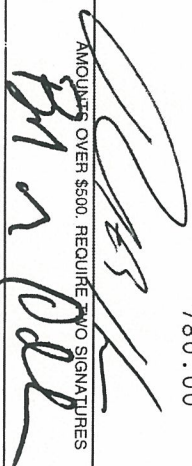
OUR REF. NO.	YOUR INV. NO.	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN	NET CHECK AMOUNT
621273	FEE	03/15/00	780.00	780.00	.00	780.00

CHECK NO. 246955 CHECK DATE 03/15/00 VENDOR NO. F07025
HOGAN & HARTSON L.L.P. CHECK NO. 246955

246955 03/15/00 F07025
 ATTORNEYS AT LAW
 555 13TH STREET, N.W.
 WASHINGTON, D.C. 20004
 BANK OF AMERICA
 WASHINGTON, D.C. 15-120
 540

CHECK AMOUNT 780.00

SEVEN HUNDRED EIGHTY AND 00/100
 PAY
 TO THE FEDERAL COMMUNICATIONS
 ORDER OF COMMISSION


 AMOUNTS OVER \$500: REQUIRE TWO SIGNATURES
 AUTHORIZED SIGNATURE

⑈ 246955⑈ ⑆ 054001204⑆ 001920087047⑈