

**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: _____

FCC/REGISTRATION MAR 15 2000

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

In the Matter of

WESTERN LONG DISTANCE, INC.
d/b/a WHIDBEY LONG DISTANCE
d/b/a POINT ROBERTS LONG DISTANCE
d/b/a HAT ISLAND LONG DISTANCE

File No.

Application for Authority to Resell
International Switched Telecommunications
Service

APPLICATION FOR STREAMLINED
INTERNATIONAL SECTION 214 AUTHORITY

Western Long Distance, Inc., d/b/a Whidbey Long Distance,
d/b/a Point Roberts Long Distance and d/b/a Hat Island Long
Distance Company ("Western" or "Applicant") requests authori-
zation, pursuant to Section 214 of the Communications Act and
Section 63.18 of the Commission's Rules, to resell the switched
telecommunications services of other common carriers services
between the United States and international points. See 47
U.S.C. § 214 (1988); International Section 214 Streamlining
Order, 61 Fed. Reg. 15,724, 15,729 (1995) (codified at 47 C.F.R.
§ 63.18).

Western requests authorization to operate as a resale
carrier pursuant to the terms and conditions of Section
63.18(e) (2) of the Rules. Unless formally opposed, the present
application qualifies for streamlined treatment under Section
63.12 of the Rules. See International Section 214 Streamlining
Order, supra at 15,728 (codified at 47 C.F.R. §§ 63.12).

Western's proposal will permit it to purchase switched international telecommunications services from other carriers at volume discounts, and to pass through some of its savings to its resale customers. The public interest will be served by Western's ability to offer additional service options and reduced rates to its customers.

Grant of this application will serve the public interest, convenience and necessity and in support thereof, the following information is submitted pursuant to Section 63.18 of the Commission's Rules:

a) Name, address, and telephone number of Applicant are:

Western Long Distance, Inc.
14888 State Route 525
Langley, Washington 98260
Telephone: (360) 321-1234
Facsimile: (360) 321-8118

b) Applicant is organized as a Corporation under the laws of:
Washington

c) Correspondence concerning the application should be addressed to:

David C. Henny, President
Western Long Distance, Inc.
14888 State Route 525
Langley, Washington 98260
Telephone: (360) 321-1234
Facsimile: (360) 321-8118

with copies to legal counsel:

Gerard J. Dufly
Blooston, Mordkofsky, Jackson and Dickens
2120 L Street, N.W., Suite 300
Washington, D.C. 20037
Telephone: (202) 659-0830
Facsimile: (202) 828-5568

d) Western has not previously received authority under Section 214 of the Communications Act, 47 U.S.C. 214. With the grant of this application, Western will have international switched resale authority under Section 214 of the Communications Act.

e) Western is requesting authority under Section 214 of the Communications Act, 47 U.S.C. § 214, to operate as a resale carrier pursuant to the terms and conditions of Section 63.18(e) (2) of the Commission's Rules, 47 C.F.R. § 63.18(e) (2).

C E R T I F I C A T I O N S

Affiliations

Western certifies that it is not a foreign carrier, and that it does not have an affiliation with any foreign carrier.

Western certifies that it does not have an affiliation with any of the U.S. carriers whose facilities-based international services it proposes to resell.

The name, address, citizenship and principal business of the only entity with a ten percent (10%) or greater interest in Western is:

<u>Name/Address</u>	<u>Owned</u> %	<u>Citizen</u>	<u>Principal Business</u>
Whidbey Telephone Co. 14888 SR 525 Langley, WA 98260	100.0%	WA Corp.	Telecommunications

Whidbey Telephone Company ("WTC") is a local exchange carrier. The name, address, citizenship and principal business of the only entity having a ten percent (10%) or greater interest in WTC are:

<u>Name/Address</u>	<u>Owned</u> %	<u>Citizen</u>	<u>Principal Business</u>
David C. Henny 14888 SR 525 Langley, WA 98260	97.4%	U.S.A.	Telecommunications

Western is also affiliated with Hat Island Telephone Company ("HITC"), another local exchange carrier. Western: (1) will maintain separate books of account from WTC and HITC, its affiliated local exchange carriers; (2) will not jointly own transmission or switching facilities with WTC or HITC; and (3) will take any tariffed services from WTC or HITC pursuant to the terms and conditions of their generally applicable tariffs.

Western will be treated as a nonregulated affiliate of WTC and HITC for purposes of local exchange carrier accounting under the Commission's joint cost and affiliate transactions rules as set forth in Parts 32 and 64 of the Commission's Rules.

Foreign Concessions and Arrangements

Western hereby certifies that it has not agreed to accept special concessions, directly or indirectly, from any foreign carrier or foreign administration with respect to traffic and revenue flows between the United States and any foreign country which the Applicant may serve under the authority sought; and that it will not enter into such agreements in the future.

Anti-Drug Abuse Act Certification

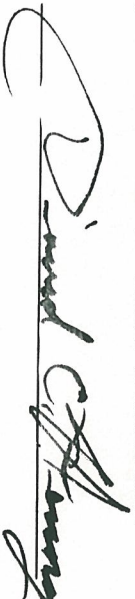
Western certifies that, to the best of its knowledge and belief, no party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 862.

CONCLUSION

In light of the foregoing, Western respectfully submits that the public interest, convenience and necessity would be served by a grant of the Section 214 authorization sought, and that such authorization should be issued to it for purposes of reselling the switched services of other common carriers to provide international switched telecommunications services between the United States and international points.

Respectfully submitted,
WESTERN LONG DISTANCE, INC.
d/b/a WHIDBEY LONG DISTANCE
d/b/a POINT ROBERTS LONG DISTANCE
d/b/a HAT ISLAND LONG DISTANCE

By:



Printed Name: David C. Henry

Title: President

Date: March 14, 2000

Counsel:
Gerard J. Duffy
Bloomston, Mordkofsky, Jackson and Dickens
2120 L Street, N.W., Suite 300
Washington, D.C. 20037
Phone: (202) 659-0830
Fax: (202) 828-5568

CERTIFICATE OF SERVICE

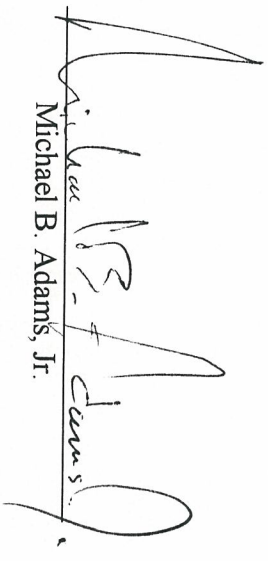
I, Michael B. Adams, Jr., hereby certify that I am an attorney with the law firm of Blooston, Mordkofsky, Jackson & Dickens and that a copy of the foregoing "Application for Streamlined Section 214 Authority" was served this 15th day of March, 2000, by first class mail as indicated, to the persons listed below.

The Honorable Mike Lowry
Office of the Governor
Post Office Box 40002
Olympia, WA 98504

The Honorable Madeline Albright
Secretary of State
United States Department of State
2201 C Street, N.W.
Washington, D.C. 20520

The Honorable William S. Cohen
Secretary of Defense
1000 Defense Pentagon
The Pentagon
Washington, D.C. 20301

International Transcription Service
1231 20th Street, N.W.
Washington, D.C. 20037


Michael B. Adams, Jr.

READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE

APPROVED BY OMB 3060-0589

PAGE NO. 1 OF 1

(1) LOCKBOX # 358115

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) Whidbey Telephone Company
(4) STREET ADDRESS LINE NO. 1 2747 E. State Highway 525
(5) STREET ADDRESS LINE NO. 2

(3) TOTAL AMOUNT PAID (dollars and cents) \$ 780.00

(6) CITY Langley (7) STATE WA (8) ZIP CODE 98260
(9) DAYTIME TELEPHONE NUMBER (include area code) (360) 321-1111 (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) Western Long Distance, Inc.
(12) STREET ADDRESS LINE NO. 1 2747 E. State Highway 525
(13) STREET ADDRESS LINE NO. 2

(14) CITY Langley (15) STATE WA (16) ZIP CODE 98260
(17) DAYTIME TELEPHONE NUMBER (include area code) (360) 321-1111 (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 (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 \$ (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 \$ (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 \$ (24D) FCC CODE 2

SECTION D - TAXPAYER INFORMATION (REQUIRED)

(25) PAYER TIN 0910471290 (26) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-11 IS DIFFERENT FROM PAYER NAME IN A-2) APPLICANT TIN 0910471290

(27) CERTIFICATION STATEMENT

I, _____, (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 _____
MONTH _____ YEAR _____

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

WHIDBEY TELEPHONE COMPANY

2747 E. STATE HIGHWAY 525
LANGLEY, WA 98260
(360) 321-1111

WHIDBEY ISLAND BANK
P.O. BOX 212
CLINTON, WA 98236

1646

98-555/1251

3/14/2000

PAY
TO THE
ORDER OF FEDERAL COMMUNICATIONS COMMISSION

\$ **780.00

Seven Hundred Eighty and 00/100*****

DOLLARS

Heidi M. Busman
AUTHORIZED SIGNATURE

MP

MEMO

⑈001646⑈ ⑆125105550⑆ 499700022⑈