

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: _____

SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

3000 K STREET, NW, SUITE 300
WASHINGTON, DC 20007-5116
TELEPHONE (202) 424-7500
FACSIMILE (202) 424-7647

NEW YORK OFFICE
405 LEXINGTON AVENUE
NEW YORK, NY 10174

RECEIVED

MAR 31 2000

March 31, 2000

VIA COURIER

Ms. Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
International Bureau Telecommunications Division
Box 358115
Pittsburgh, PA 15251-5115

Re: Application of Telseon Carrier Services, Inc. for Global Authority Pursuant to Section 214 of the Communications Act of 1934, As Amended, to Operate as an International Facilities-based Carrier and as an International Resale Carrier between the United States and various International Points

Dear Ms. Salas:

Enclosed for filing with the Commission are an original and six (6) copies of the application of Telseon Carrier Services requesting global authority, pursuant to Section 214 of the Communications Act of 1934, as amended, to operate as an international facilities-based carrier and as an international resale carrier between the United States and various International Points.

As required by the Commission's Rules, a check in the amount of \$780.00 is enclosed. Please date-stamp the extra copy of this application and return it in the enclosed self-addressed, stamped envelope. Any questions regarding the enclosed application should be addressed to James N. Moskowitz at (202) 424-7709.

Respectfully submitted,


Andrew D. Lipman
James N. Moskowitz

Counsel for Telseon Carrier Services, Inc.

Enclosures

cc: Steve Miller (Telseon)
Michael Schunck

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE

(1) LOCAL # 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)
Swidler Berlin Shereff Friedman LLP

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

(4) STREET ADDRESS LINE NO 1
3000 K Street, N.W.

(5) STREET ADDRESS LINE NO 2
Suite 300

(6) CITY
Washington

(7) STATE
D.C.

(8) ZIP CODE
20007-5116

(9) DAYTIME TELEPHONE NUMBER (include area code)
(202) 424-7500

(10) COUNTRY CODE (for non 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)
Telseon Carrier Services, Inc.

(12) STREET ADDRESS LINE NO. 1 480 South California Avenue, Suite 301

(13) STREET ADDRESS LINE NO. 2

(14) CITY
Palo Alto

(15) DAYTIME TELEPHONE NUMBER (include area code)
(650) 322-3910, ext. 143

(7) STATE
CA

(16) ZIP CODE
94306

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)	(21A) QUANTITY	(22A) FEE DUE FOR PTC IN BLOCK 20A	FCC USE ONLY	
	C	U	T	1	\$780.00

(19B) FCC CALL SIGN/OTHER ID	(20B) PAYMENT TYPE CODE (PTC)	(21B) QUANTITY	(22B) FEE DUE FOR PTC IN BLOCK 20A	FCC USE ONLY
	*	*	*	*

(19C) FCC CALL SIGN/OTHER ID	(20C) PAYMENT TYPE CODE (PTC)	(21C) QUANTITY	(22C) FEE DUE FOR PTC IN BLOCK 20A	FCC USE ONLY
		*	*	*

(19D) FCC CALL SIGN/OTHER ID	(20D) PAYMENT TYPE CODE (PTC)	(21D) QUANTITY	(22D) FEE DUE FOR PTC IN BLOCK 20A	FCC USE ONLY
		*	*	*

SECTION D - TAXPAYER INFORMATION (REQUIRED)

(25) PAYER TIN	0	1	3	2	6	7	9	6	7	6	(25) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-11 IS DIFFERENT FROM PAYER NAME IN	APPLICANT TIN	9	4	3	3	2	1	3	3	3
----------------	---	---	---	---	---	---	---	---	---	---	-----------------------------------------------------------------------------------------	---------------	---	---	---	---	---	---	---	---	---

SECTION E - CERTIFICATION

(27) CERTIFICATION STATEMENT
I, James N. Moskowitz, 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:	MASTER CARD/VISA ACCOUNT NUMBER:	EXPIRATION DATE:																																																															
<table border="1"> <tr><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td></tr> </table>	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	<table border="1"> <tr><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td></tr> </table>	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	<table border="1"> <tr><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td><td>•</td></tr> </table>	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•																																													
•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•																																													
•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•																																													

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

In the Matter of)
)
)

Telseon Carrier Services, Inc.)

File No. ITC - 214 - 2000 _____

Application for Authority Pursuant to)
Section 214 of the Communications Act)
of 1934, as amended, for Global Authority)
to Operate as an International)
Facilities-Based and Resale Carrier)
Between the United States and Various)
International Points)
_____)

APPLICATION

Telseon Carrier Services, Inc. (“Telseon” or “Applicant”), by its undersigned counsel, hereby requests global facilities-based authority and global resale authority, under Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, and Section 63.18 of the Commission’s Rules, 47 C.F.R. § 63.18, to provide international facilities-based and resale telecommunications services between the United States and international points.

I. The Applicant

Telseon is a corporation organized under the laws of the State of Delaware. Telseon is not a foreign carrier and is not affiliated, within the meaning of Section 63.09(e) of the Commission's Rules, 47 C.F.R. § 63.09(e), with any foreign carrier. Accordingly, Telseon qualifies for the presumption of non-dominance under Section 63.10(a)(3) of the Commission's Rules, 47 C.F.R. § 63.10(a)(3) and Telseon's application is eligible for streamlined processing.

II. Public Interest Considerations

By granting this application, the Commission will serve the public interest, convenience and necessity 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 Telseon.

III. Information Required by Section 63.18

Telseon submits the following information, as required by Section 63.18 of the Commission's Rules, in support of its request for Section 214 authorization:

- (a) Name, address and telephone number of Applicant:
- Telseon Carrier Services, Inc.
480 South California Avenue, Suite 301
Palo Alto, CA 94306
650-322-3910 (Tel.)
650-322-3911 (Fax)
- (b) Applicant is a corporation organized under the laws of the State of Delaware

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

James N. Moskowitz
SWIDLER BERLIN SHEREFF FRIEDMAN, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
Tel: (202) 424-7500
Fax: (202) 424-7645

with a copy to:

Steven Miller, General Counsel
Telseon Carrier Services, Inc.
480 South California Avenue, Suite 301
Palo Alto, CA 94306
650-322-3910 (Tel.)
650-322-3911 (Fax)

- (d) Telseon has not previously received authority under Section 214 of the Act. Upon grant of this Application, Telseon will become an authorized non-dominant facilities-based carrier and reseller with global authority, pursuant to Section 214 of the Act and the Commission's Rules.
- (e) (1) Telseon requests Section 214 authority to operate as a facilities-based carrier pursuant to Section 63.18(e)(1) of the Commission's Rules. Telseon requests such authorization for all international routes authorized by the Commission. Telseon certifies that it will comply with the terms and conditions of Sections 63.21 and 63.22 of the Commission's Rules.
- (2) Telseon also requests Section 214 authority to resell the international services of authorized U.S. common carriers pursuant to Section 63.18(e)(2) of the Commission's Rules. Telseon requests such authorization for all international routes authorized by the Commission. Telseon certifies that it will comply with the terms and conditions contained in Section 63.21 and 63.23 of the Commission's Rules.
- (f) Telseon seeks the authority to provide only the services referenced under paragraph (e) of Section 63.18 of the Commission's Rules.
- (g) Given that Telseon is not seeking facilities-based authority pursuant to Section 63.18(e)(4) of the Commission's Rules, this Section is not applicable.

(h) In support of this certification, the name, address, citizenship, and principal business of the shareholder that controls 10 percent or more of Telseon Communications Corporation is as follows:

Name: Cmetric, Inc.
Address: 480 South California Avenue, Suite 301, Palo Alto, CA 94306
Percentage Held: 100%
Citizenship: United States
Principal Business: telecommunications holding company

Applicants parent, Cmetric, Inc., in turn has the following principal shareholders that control 10 percent or more of Cmetric, Inc.:

Name: Sevin Rosen Funds
Address: 169 University Avenue, Palo Alto, CA 94301
Percentage Held: 25%
Citizenship: United States
Principal Business: Technology holdings

Name: Crosspoint Venture Partners
Address: 18552 MacArthur Blvd., Suite 400, Irvine, CA 92612
Percentage Held: 25%
Citizenship: United States
Principal Business: Technology holdings

Name: Steven Russell
Address: 480 South California Avenue, Suite 301, Palo Alto, CA 94306
Percentage Held: 10%
Citizenship: United States
Principal Business: Telecommunications Executive
(Founder and President, Cmetric Inc.)

Telseon currently has no interlocking officers or directors with foreign carriers.

(i) Telseon certifies that it is not a foreign carrier and that it is not currently affiliated with any foreign carriers.

(j) Telseon seeks to provide international telecommunications services to all global points, except those points on the Commission's Exclusion List. Telseon is not a foreign carrier or affiliated with a foreign carrier.

(k) Not applicable

(l) Not applicable

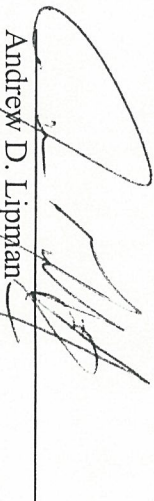
- (m) As described above, Telseon presumptively qualifies for non-dominant treatment for the provision of all international telecommunications services on all routes pursuant to Section 63.10 of the Commission's Rules.
- (n) Telseon certifies that it has not agreed, and will not agree in the future, to accept special concessions directly or indirectly from any foreign carrier where the foreign carrier possesses market power on the foreign end of the route, and it will not enter into such agreements in the future.
- (o) Telseon certifies, pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules (implementing the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 3301), that no party to its application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
- (p) Telseon qualifies for streamlined processing pursuant to Section 63.12(a-b) of the Commission's Rules because, as set forth above in Section (1), Telseon qualifies for a presumption of non-dominance under Section 63.10(a)(1) of the Commission's Rules.

IV. CONCLUSION

For the reasons stated above, Telseon Carrier Services, Inc. respectfully submits that the public interest, convenience, and necessity would be furthered by a grant of this Section 214 Application.

Respectfully submitted,

By:



Andrew D. Lipman
James N. Moskowitz
SWDLER BERLIN SHEREFF FRIEDMAN, LLP
3000 K Street, N.W., Suite 300
Washington, DC 20007
Tel.: (202) 424-7500
Fax: (202) 424-7645

Counsel for
Telseon Carrier Services, Inc.

Dated: March 31, 2000

CERTIFICATION OF APPLICANT

On behalf of Telseon Carrier Services, Inc. I hereby certify that the statements in the foregoing Application for Section 214 authority are true, complete, and correct to the best of my knowledge and are made in good faith.

Telseon Carrier Services, Inc.

By:



Name:

Steven Miller

Title:

General Counsel

Date:

March 29, 2000

SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

3000 K STREET, NW, SUITE 300
WASHINGTON, DC 20007-5116
TELEPHONE (202) 424-7500
FACSIMILE (202) 424-7647

NEW YORK OFFICE
405 LEXINGTON AVENUE
NEW YORK, NY 10174

April 12, 2000

VIA COURIER

Ms. Magalie Roman Salas, Esq., Secretary
Federal Communications Commission
The Portals, 445 12th Street, N.W.
TW-A325, 12th Street Lobby
Washington, D.C. 20554

Attn.: Ms. Fran Eisenstein

Re: First Supplement to the Application of Telseon Carrier Services, Inc. for Global Authority Pursuant to Section 214 of the Communications Act of 1934, As Amended, to Operate as an International Facilities-based Carrier and as an International Resale Carrier between the United States and various International Points

Dear Ms. Salas:

Please find attached an original and six (6) copies of the present first supplement to the March 31, 2000 application of Telseon Carrier Services ("Telseon") for global authority, pursuant to Section 214 of the Communications Act of 1934, as amended, to operate as an international facilities-based carrier and as an international resale carrier between the United States and various International Points.

Pursuant to a request by Ms. Eisenstein, Telseon respectfully submits the following clarification regarding items III (h) of Telseon's original application which provides the information required under Section 63.18 of the Commission's Rules: Both of the entities which hold twenty-five percent (25%) stakes in the Applicant, Sevin Rosen Funds and Crosspoint Venture Partners (collectively "Funds"), are venture capital funds with widely dispersed ownership. Neither of these Funds has any one investor with a sufficient stake in either of the Funds to make such an investor a reportable 10% or greater owner of the Applicant. Therefore, Telseon respectfully submits that the three entities listed in its original application are the only ten percent or greater investors in Telseon. We hope that this additional information is satisfactory to meet the Commission reporting requirements.

Magalie Roman Salas
April 12, 2000
April 12, 2000
Page 2

Please date stamp the extra copy of this application and return it in the enclosed self addressed, stamped envelope. Any questions regarding the enclosed application should be addressed to James N. Moskowitz at (202) 424-7709.

Respectfully submitted



Andrew D. Lipman
James N. Moskowitz

Counsel for Telseon Carrier Services, Inc.

cc: Fran Eisenstein (*via facsimile*)
Steve Miller (Telseon)
Michael Schunck

327934