

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:

Down to Jones & Down Rep

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

In the Matter of Application of

TELLUS Communications (B.C.) Inc.

File No. I.T.C. -00- _____

For Authority Pursuant to Section 214 Under
the Communications Act of 1934 as Amended,
for Global Authority to Operate as an
International Reseller and Facilities-Based
Carrier

**APPLICATION FOR
SECTION 214 AUTHORIZATION**

TELLUS Communications (B.C.) Inc. ("TCBC") requests authority, pursuant to 47 U.S.C. Section 214 and 47 CFR Section 63.18, to provide both global international facilities-based and resale services between the United States and international points. TCBC currently holds Section 214 authorization for facilities-based service only. TCBC requests streamlined processing of this application.

I. BACKGROUND

TCBC is currently the largest local exchange service provider in British Columbia, Canada.¹ In 1998, the FCC granted TCBC (then known as BC TEL) Section 214 authority to provide facilities-based service between the U.S. and all authorized points.² TCBC

¹ TCBC's foreign affiliations are discussed on page 4 of this application.

² See *Public Notice*, DA No. 98-2313, Report No. TEL-00031 (rel. Nov. 12, 1998) (referencing FCC file No. ITC-214-19980921-00660).

now requests authority to resell international services lines, in addition to facilities-based authority. TCBC's resale services will offer international callers an additional choice of carriers and promote competition. Consequently, the Commission will serve the public interest, convenience and necessity by granting this application.

II. REQUIRED INFORMATION REGARDING TCBC

TCBC submits this information as required by 47 CFR § 63.18. TCBC's certification is enclosed as Attachment A and incorporated by reference.

1. Name, address, and telephone number of Applicant (47 CFR § 63.18(a))

TCBC
Legal Department
21-3777 Kingsway
Burnaby, B.C. VSH 3Z7

2. Government under which TCBC is organized (47 CFR § 63.18(b))

TCBC is a corporation organized under the laws of Canada

3. Where to send correspondence (47 CFR § 63.18(c))

Correspondence concerning this application should be sent to:

Willie Grieve
TELUS VP Government and Regulatory Affairs
21, 10020-100 Street
Edmonton, Alberta, Canada T5J 0N5
Tel.: (780) 493-6590
Fax: (780) 493-6519
E-mail: willie.grieve@telus.com

- and -

Brooks Harlow
Miller Nash LLP
4400 Two Union Square
601 Union Street
Seattle, WA 98109
Tel.: (206) 622-8484
Fax: (206) 622-7485

4. Whether TCBC currently has Section 214 approval (47 CFR § 63.18(d))

TCBC currently holds Section 214 authority to provide global facilities-based service.³

5. Authority Requested (47 CFR § 63.18(e))

a. Global Resale Authority. TCBC requests authority to operate as a resale carrier pursuant to § 63.18(e)(2) of the Commission's rules. TCBC will comply with the terms and conditions of §§ 63.21 and 63.23 of the Commission's rules.

b. Global Facilities-Based Authority. TCBC currently holds authority to provide global facilities-based service. TCBC requests continued Section 214 authority to operate as a facilities-based carrier pursuant to § 63.18(e)(1). TCBC will comply with the terms and conditions of § 63.21 and § 63.23 of the Commission's rules.

6. The 10% or greater owners of TCBC (47 CFR § 63.18(h))

- a. BCT.TELUS Communications, Inc. ("BCT.TELUS")
Legal Department
21-3777 Kingsway
Burnaby, B.C. VSH 3Z7
Citizenship: Canadian
Principal Business: Telecommunications
BCT.TELUS owns 100% of TCBC. This application does not involve a change in ownership, and BCT.TELUS will retain control of TCBC following grant of this application.⁴
- b. Anglo-Canadian Telephone Company ("Anglo-Canadian")
c/o GTE Corporation
1255 Corporate Drive
Irving, TX 75038
Citizenship: Canadian
Principal business: Telecommunications
Anglo-Canadian holds 26.7% of BCT.TELUS.

³ See Public Notice, DA No. 99-440, Report No. TEL-00070 (rel. March 4, 1999) ("*Transfer of Control Notice*").

⁴ See generally, *Transfer of Control Notice*.

- c. GTE Anglo Holding Company, Inc. ("GTE Anglo")
c/o GTE Corporation
1255 Corporate Drive
Irving, TX 75038
Citizenship: USA
Principal business: Telecommunications
GTE Anglo holds 100% of the Common Stock of Anglo-Canadian
- d. GTE Corporation ("GTE")
1 Stanford Forum
Stanford, CT 06904
Citizenship: USA
Principal business: Telecommunications
GTE owns 26.7% of BCT.TELUS indirectly through its wholly owned subsidiary GTE Anglo.

7. Interlocking Directorates (47 CFR § 63.18(h), part 2)
TCBC has no interlocking directorates.

8. Whether TCBC is or is affiliated with a foreign carrier (47 CFR § 63.18(i))
TCBC is affiliated with carriers in Canada, the Dominican Republic, Venezuela, and Argentina. These affiliations are explained further in response to number 9.

9. Certification regarding affiliated foreign carriers (47 CFR § 63.18(i))
TCBC requests authority to serve routes between the U.S. and all international points. This includes Canada, where TCBC is a carrier, and countries where GTE has an affiliation with a carrier. GTE has the following foreign affiliations in addition to its interests in TCBC:

a. Canada. GTE owns 100% of the stock of GTE Anglo, which owns 100% of the common stock of Anglo-Canadian. Anglo-Canadian owns 50.18% of The Québectel Group Inc., which owns 100% of Québec-Téléphone ("QTGI"). QTGI provides telecommunications services within its certified territory on the Gaspé Peninsula in the Province of Québec. QTGI has approximately 300,000 access lines and serves a population of about 558,000.

Pursuant to the terms of a Merger Agreement, BCT.TELUS has agreed to acquire 70% of QTGI. The acquisition shall be effected through the purchase by BCT.TELUS of a 20% interest in QTGI from Anglo-Canadian, the subscription by BCT.TELUS for common stock and the conversion and redemption by QTGI of the QTGI common stock currently held by QTGI's public shareholders. Upon completion of the transaction, QTGI will be held approximately 70% by BCT.TELUS and approximately 30% by Anglo-Canadian. The transaction is scheduled to close in mid-2000 and is subject to the parties obtaining all requisite shareholder, board and regulatory approvals.

b. Dominican Republic. GTE owns 100% of GTE Holdings (Canada) Limited which owns 100% of Compañía Dominicana de Teléfonos, C. por A. ("CODETEL"), a provider of domestic and international services in the Dominican Republic.

c. Venezuela. GTE owns 100% of GTE International Telecommunications Incorporated, which owns 100% of GTE Venezuela Incorporated ("GTE Venezuela"). GTE Venezuela owns 51% of VenWorld Telecom C.A., a consortium which owns 40% of Compañía Anónima Nacional Teléfonos de Venezuela ("CANTV"). CANTV provides domestic and international telecommunications services in Venezuela.

d. Argentina. GTE is a 25.5% participant in a joint venture, CTI Compañía de Teléfonos del Interior S.A., a provider of CMRS service in Argentina, except for Buenos Aires.

10. World Trade Organization membership (47 CFR § 63.18(k))
Canada, the Dominican Republic, Venezuela and Argentina are all World Trade Organization members.

11. Resale of unaffiliated U.S. carrier service (47 CFR § 63.18(d))
TCBC requests authority to resell the services of unaffiliated U.S. carriers to provide services to all international points, including countries where it has an affiliation. TCBC satisfies 47 CFR § 63.10(a)(3) because it is non-dominant on all routes between U.S. and

international points except on the U.S. to the Dominican Republic and U.S. to Venezuela routes, as explained in response number 12. TCBC agrees to file quarterly traffic reports if it offers service on the US to Dominican Republic and US to Venezuela routes.

12. Non-dominant versus dominant regulation (47 CFR § 63.18(m))

The FCC has already reviewed TCBC's foreign affiliations and determined that that TCBC is non-dominant except on the U.S. to Dominican Republic and Venezuela routes.⁵ TCBC has acquired no additional foreign affiliations since the FCC's decision other than its expanded interest in the Canadian carrier QTGI, as explained above. Therefore, TCBC requests identical regulatory treatment following the grant of this application.

13. Special concessions (47 CFR § 63.18(m))

TCBC 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 will not enter into such agreements in the future.

14. Anti-Drug Abuse Act (47 CFR § 63.18(o))

TCBC certifies that no party to this application has been denied federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

15. Streamlined processing (47 CFR § 63.18(p))

TCBC requests streamlined processing of this application. The streamlined procedures apply where an applicant that is affiliated with a foreign carrier is either non-dominant or agrees to dominant regulation. 47 CFR § 63.12(c)(1)(i), (v). As explained above, TCBC is non-dominant on all routes except U.S. to Venezuela and U.S. to the Dominican Republic, where it agrees to dominant regulation. Streamlined processing is therefore appropriate.

⁵ *Order*, PA 99-1648, File No. ITC-T/C-19990114-00023 (rel. Aug. 19, 1999).

III. CONCLUSION

In conclusion, TCBC certifies that all information in this application is accurate and correct. For these reasons, TCBC respectfully requests that the Commission grant this application.

Respectfully submitted,

MILLER NASH LLP



Brooks E. Harlow
Miller Nash LLP
4400 Two Union Square
601 Union Street
Seattle, Washington 98101-2352
Attorneys for TCBC

Date: 4/14/00

Attachment A

The undersigned certifies that the information contained in the foregoing application is true and correct.



Rod Frank
TELUS Communications (B.C.) Inc.
32, 10020-100 Street
Edmonton, Alberta
Canada T5J 0N5



Willie Grieve
Vice President
Government & Regulatory Affairs

TELUS Corporation
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Edmonton, Alberta
Canada T5J 0N5

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

May 10, 2000

Magalie Roman Salas
Secretary
Federal Communications Commission
445 - 12th Street S.W.
Washington, D.C. 20554

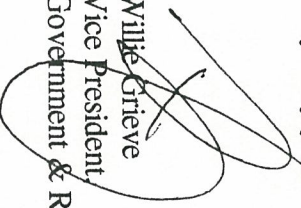
Re: Amendment of Pending Section 214 Application of TELUS Communications (B.C.) Inc.

Dear Ms. Salas:

By this letter, TELUS Communications (B.C.) Inc. ("TCBC") amends its pending Section 214 Application for resale authority filed on April 17, 2000. TCBC agrees to dominant carrier regulation on the U.S. to Gibraltar route following approval of the Bell Atlantic Communications, Inc. and GTE Corporation merger.

Please call me or one of my staff (Rod Frank (780) 493-3099) if you have any questions.

Very truly yours,

for

Willie Grieve
Vice President
Government & Regulatory Affairs

cc: George Li
Susan O'Connell



Willie Griève
 Vice President
 Government & Regulatory Affairs

TELUS Corporation
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 Edmonton, Alberta
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 willie.griev@telus.com

May 12, 2000

Magalie Roman Salas
 Secretary
 Federal Communications Commission
 445 - 12th Street S.W.
 Washington, D.C. 20554


Re: Amendment of Pending Section 214 Application of TELUS Communications (B.C.) Inc.

Dear Ms. Salas:

By this letter, TELUS Communications (B.C.) Inc. ("TCBC") amends its pending Section 214 Application for resale authority filed on April 17, 2000. TCBC's parent company, BCT TELUS Communications Inc. ("BCT TELUS"), wholly owns TELUS Communications Inc. ("TCI"), the largest local exchange service provider in Alberta, Canada. TCI also provides long-distance, data, wireless and internet services. As a result, TCBC has an affiliation with TCI.

Please call me or one of my staff (Rod Frank (780) 493-3099) if you have any questions.

Very truly yours,

For

 Willie Griève
 Vice President
 Government & Regulatory Affairs

cc: George Li
 Susan O'Connell

¹ On May 3, 2000 BCT TELUS changed its name to TELUS Corporation, but this change is subject to regulatory approval in Canada.