

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: _____

COPY

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May 4, 2000

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**** ADMITTED IN MARYLAND ONLY
***** ALSO ADMITTED IN CALIFORNIA
***** ALSO ADMITTED IN MARYLAND
***** ALSO ADMITTED IN VIRGINIA

VIA HAND DELIVERY

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

Re: Application of PurePacket Communications, Inc. 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; File No. _____

Dear Secretary Salas:

Enclosed are an original and (5) five copies of the Application of PurePacket Communications, Inc., for authorization under Section 214 of the Communications Act of 1934, as amended, for global authority to operate as an international facilities-based and resale carrier. Also enclosed is the required FCC Form 159 and a check payable to the Federal Communications Commission for \$780.00 to cover the required filing fee.

COLE, RAYWID & BRAVERMAN, L.L.P.

Ms. Magalie Roman Salas, Secretary

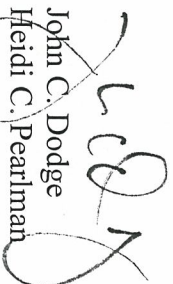
May 4, 2000

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The undersigned counsel hereby requests that the enclosed "stamp and return" copy of the above-captioned Application be stamped with acknowledgement of receipt and returned to the undersigned in the enclosed self-addressed envelope.

Please contact the undersigned at 202-659-9750 should there be any questions regarding this filing.

Very truly yours,



John C. Dodge
Heidi C. Pearlman

Counsel for PurePacket Communications, Inc.

cc: Ms. Rebecca Abrogast, Chief, International Bureau-Telecom Division

Mr. Matthew Vitale, International Bureau

101549-1

READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION

APPROVED BY OMB 3060-0589

REMITTANCE ADVICE

(1) LOCKBOX # 358 115

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)
PUREPACKET COMMUNICATIONS, INC.

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

(4) STREET ADDRESS LINE NO. 1
1111 AUDEMAN DRIVE

(5) STREET ADDRESS LINE NO. 2

(6) CITY
ALPHARETTA

(7) STATE
GEORGIA

(8) ZIP CODE
30005

(9) DAYTIME TELEPHONE NUMBER (include area code)
(404) 664-7566

(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)

(12) STREET ADDRESS LINE NO. 1

(13) STREET ADDRESS LINE NO. 2

(14) CITY

(15) STATE

(16) ZIP CODE

(17) DAYTIME TELEPHONE NUMBER (include area code)

(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
CUT

(20A) PAYMENT TYPE CODE (PTC)
780.00

(22A) FEE DUE FOR (PTC) IN BLOCK 20A
\$ 780.00

(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
\$

(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
\$

(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
\$

(23D) FCC CODE 1

(24D) FCC CODE 2

(25) PAYER TIN
0582502606

SECTION E - CERTIFICATION

APPLICANT TIN

(27) CERTIFICATION STATEMENT
MICHAEL J. HUEBNER

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

Michael J. Huebner

(28) MASTERCARD/VISA ACCOUNT NUMBER

MASTERCARD

EXPIRATION DATE:
MONTH YEAR

VISA

AUTHORIZED SIGNATURE

DATE

SEE PUBLIC BURDEN ESTIMATE ON REVERSE

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

In the Matter of)
PurePacket Communications, Inc.)
PurePacket Communications of the South, Inc.)
PurePacket Communications of the Northeast, Inc.)
PurePacket Communications of the West, Inc.)
PurePacket Communications of Virginia, Inc.)
Application for authority pursuant)
Section 214 of the) File No. _____
Communications Act of 1934,)
as amended, for global authority)
to operate as an international)
facilities-based and resale carrier)

Application

PurePacket is a U.S. start-up company organized to provide national and international telecommunications services. PurePacket plans to offer affordable voice, data, Internet and network-based application services, on an integrated basis, to small and mid-market businesses. PurePacket has no foreign affiliations. PurePacket is in the process of obtaining the state certification and executing interconnection agreements with U.S. Incumbent Local Exchange Carriers ("ILECs") and plans to serve business customers throughout the United States.

Granting PurePacket's application will serve the public interest, convenience and necessity by promoting competition in the international services market. Pure Packet's entrance into the telecommunications marketplace will serve the public interest by providing U.S. consumers greater choice among telecommunications service providers. Competition will also benefit U.S. consumers by increasing service options and lowering prices.

Section 63.18 Information

- a) Applicant's name, address and telephone number:
PurePacket Communications, Inc.
1111 Alderman Drive, Suite 200
Alpharetta, GA 30005
(770) 522-8191
- b) PurePacket is a corporation organized under the laws of the state of Delaware.
- c) Correspondence concerning the application should be sent to:
Tom Buttermore, CEO
PurePacket Communications, Inc.
1111 Alderman Drive, Suite 200
Alpharetta, GA 30005
(770) 294-5010

with copies of all correspondence to:

John Dodge
Heidi Pearlman
Cole, Raywid & Braverman, L.L.P.
1919 Pennsylvania Avenue, NW
Suite 200
Washington, DC 20006

- d) PurePacket has not previously received authority under Section 214 of the Communications Act, as amended.
- e) PurePacket requests authority to operate as a facilities-based carrier pursuant to the terms and conditions of Section 63.18(e)(1) of the Commission's Rules. PurePacket hereby certifies that it will comply with the terms and conditions contained in Section §§63.21 and 63.22 of the Commission's Rules.
- f) PurePacket requests authority to resell the international services of non-affiliated, authorized U.S. common carriers pursuant to the terms and

conditions of Section 63.18(e)(2) of the Commission's Rules. PurePacket hereby certifies that it will comply with the terms and conditions contained in Sections 63.21 and 63.23 of the Commission's Rules.

g) At this time, PurePacket seeks no other authorization available under Section 63.18(e).

h) Name, address, citizenship and principal business of the sole shareholder who controls 10% or more of PurePacket Communications, Inc.:

Tom Buttermore, CEO
PurePacket Communications, Inc.
1111 Alderman Drive
Alpharetta, GA 30005
(770) 294-5010
Principal Business: CEO of Telecommunications Corporation
Citizenship: U.S.A.

Percentage of Equity owned:

14.3%

There are no interlocking directorates with foreign carriers.

i) PurePacket certifies that it is not affiliated with any foreign or U.S. facilities-based carrier.

j) PurePacket certifies that it does not seek to provide international telecommunications services to any destination country in which it is or controls a foreign carrier. Further, Tom Buttermore, the only owner of more than 10% of Applicant's equity, does not control any foreign carriers. No other person or entity controls Applicant.

k) PurePacket has no affiliation with and is not a foreign carrier in any country to which it plans to provide service. Further, PurePacket plans to

provide international telecommunications service solely through the resale of an unaffiliated U.S. facilities-based carrier's international switched services. Thus, PurePacket is entitled to a presumption of non-dominance under Sections 63.10(a)(1) and 63.10 (a)(4) of the Commission's Rules.

l) PurePacket certifies that it has not agreed and will not agree to accept special concessions directly or indirectly from any foreign carrier or administration with respect to traffic or revenue flows between the U.S. and any foreign country which the PurePacket may serve under authority granted hereunder.

m) PurePacket certifies that, to the best of its knowledge, information and belief, neither PurePacket nor any party to this application is subject to a denial of federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988.

n) The Applicant desires streamlined processing pursuant to Section 63.12 of the Commission's Rules. This application qualifies for streamlined processing because: 1) the Applicant is not affiliated with any foreign carriers or any dominant U.S. carriers and 2) the Applicant does not seek to provide switched basic services over private lines to any country.

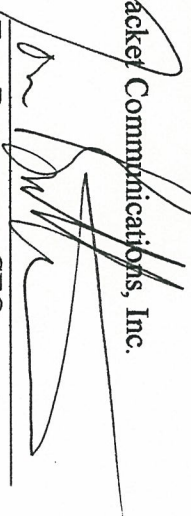
A copy of the foregoing International Section 214 Application will be delivered by hand to the following individuals:

Matthew Vitale
Policies and Facilities Branch
International Bureau, Federal Communications Commission
445 12th St., SW
Suite 6-A767
Washington, D.C. 20554

Rebecca Arbogast
Chief, Telecommunications Division
International Bureau, Federal Communications Commission
445 12th St., SW
Suite 6-A767
Washington, D.C. 20554

In conclusion, PurePacket certifies that all of the information in this application is accurate and correct.

Respectfully submitted,
PurePacket Communications, Inc.

By: 
Tom Butternore, CEO
PurePacket Communications, Inc.
1111 Alderman Drive
Alpharetta, GA 30005
(770) 294-5010

Date: 5-2-00

HARLAND 1998

PUREPACKET COMMUNICATIONS
47 PERIMETER CENTER E. STE. 550
ATLANTA, GA 30346

64-22/610
BRANCH 11625

1054

PAY TO THE
ORDER OF

Federal Communications
Commission

\$780.00

DATE 4-25-00

Seven Hundred Eighty and 00/100

DOLLARS

FIRST UNION
First Union National Bank
R/T 061000227

Margaret Morgan

FOR Section 214 Appraisal Fee

⑈001054⑈ ⑈061000227⑈ 480181841⑈

MP