#### Streamlined SNET MOBILITY, INC.

# Categories es of Services for 214 Applications (Streamline/Non-streamline)

Desc													
Description of Application:	SUBMARINE CABLE LANDING LICENSE	SPECIAL TEMPORARY AUTHORITY	PRO FORMA TRANSFER/ASSIGNMENT	ASSIGNMENT OF LICENSE	TRANSFER OF CONTROL	SWITCHED RESALE SERVICE	INTERNATIONAL SPECIAL PROJECT	INMARSAT AND MOBILE SATELLITE SERVICE	INTERCONNECTED PRIVATE LINE RESALE SERVICE	INDIVIDUAL FACILITIES-BASED SERVICE	LIMITED/GLOBAL FACILITIES-BASED/RESALE SERVICE	LIMITED/GLOBAL FACILITIES-BASED SERVICE	LIMITED/GLOBAL RESALE SERVICE

### ARNOLD PORTER

WASHINGTON, D.C. 20004-1206 555 TWELFTH STREET, N.W

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LOS ANGELES **NEW YORK** LONDON DENVER

May 16, 2000

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

Communications Act of 1934, as Amended, for Global Resale Authority Application for Authority, Pursuant to Section 214 of the

Dear Sir/Madam:

and Section 63.18 of the Commission's Rules, 47 C.F.R. § 63.18, for authority to provide global international resale services. Also enclosed is a check payable to the Federal Communications Mobility, Inc. for authority pursuant to Section 214 of the Communications Act, 47 U.S.C. § 214, Commission in the amount of \$780.00 for the prescribed filing fee. Enclosed for filing please find an original and five copies of the application of SNET

Please note that SNET Mobility, Inc. is requesting streamlined processing of this Section 214 application, pursuant to Section 63.12 of the Commission's Rules, 47 C.F.R. § 63.12.

application to: As indicated in the application, please direct questions or correspondence concerning this

San Antonio, TX 78205 210-351-3257 (facsimile) 210-351-3476 (voice) SBC Communications Inc. Vice President and Assistant General Counsel 175 E. Houston Wayne Watts

Thank you for your assistance

Sincerely,

W. Horton

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

In the Matter of  SNET Mobility, Inc.  Application for Authority, Pursuant to Section 214 of the Communications Act of 1934, as Amended, for Global Resale Authority  Authority
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## APPLICATION FOR AUTHORITY, PURSUANT TO SECTION 214 OF THE COMMUNICATIONS ACT OF 1934, AS AMENDED

Mobility") hereby requests authority to provide global international resale services ("Puerto Rico") and the United States Virgin Islands and all international points between the contiguous United States, Hawaii, the Commonwealth of Puerto Rico 47 U.S.C. § 214, and Section 63.18 of the Rules of the Federal Communications Commission ("Commission"), 47 C.F.R. § 63.18(e)(2), SNET Mobility, Inc. ("SNET Pursuant to Section 214 of the Communications Act of 1934, as amended, In support of this application, the Applicant submits the following information.

# INTRODUCTION AND DESCRIPTION OF THE APPLICANT

wholly-owned subsidiary of SBC Communications Inc. ("SBC"). SNET Mobility's wholly-owned subsidiary of Southern New England Telephone Corporation ("SNET"), a SNET Mobility is a corporation organized under the laws of Connecticut and is a

international resale services to its wireless customers through its various affiliates the State of Connecticut ("SNET Mobility Service Area"). SNET Mobility provides business consists primarily of the provision, through its affiliates of wireless services in

Norway, the Netherlands, Denmark, Germany, Canada and Lithuania rise to the level of a several foreign carriers. SBC's interest in carriers in South Africa, Switzerland, Hungary, foreign affiliation under the Commission's international section 214 regulations. See 47 C.F.R. § 63.09(e) SBC, SNET Mobility's ultimate parent corporation, has ownership interests in

# II. PUBLIC INTEREST CONSIDERATIONS

For these reasons, the Applicant respectfully requests that the Commission grant this competition, lowering prices and increasing the service options available to the public Mobility's provision of international services will benefit consumers by increasing by enabling SNET Mobility to provide its customers with international service through Application. the resale of the international services of authorized U.S. common carriers. SNET Grant of this application will serve the public interest, convenience and necessity

### III. OF THE COMMISSION'S RULES OTHER INFORMATION PROVIDED PURSUANT TO SECTION 63.18

and in support of the Applicant's request. (a) through (p) of Section 63.18 of the Commission's Rules, 47 C.F.R. §§ 63.18(a)-(p). The Applicant provides the following information in compliance with subsections

The name, address and telephone number of the Applicant are:

SNET Mobility, Inc. 17330 Preston Road, Suite 100A Dallas, TX 75252 (972) 733-8310

- Connecticut. (b) SNET Mobility is a corporation organized under the laws of the State of
- is as follows: contact person to whom correspondence concerning this application is to be addressed  $\left( c
  ight)$  The name, title, address and telephone number of each officer and other

SNET Mobility, Inc.
Carol Tacker
17330 Preston Road, Suite 100A
Dallas, TX 75252

(972) 733-2005 (voice) (972) 733-2021 (facsimile)

with a copy to

Philip Horton Arnold & Porter 555 12th Street, N.W. Washington, DC 20004

(202) 942-5787 (voice) (202) 942-5999 (facsimile)

- Communications Act, as amended, to provide international telecommunications services (d) SNET Mobility has not previously received authority under Section 214 of the
- with the terms and conditions contained in §§ 63.21 and 63.23 of the Commission's rules. to operate as a resale carrier pursuant to § 63.18(e)(2) and certifies that it will comply 63.18(e)(2) of the Commission's Rules. SNET Mobility requests Section 214 authority (e) SNET Mobility is applying for global resale authority under Section

- (f) No response required.
- 63.18(e)(4) of the Commission's Rules. Therefore, Section 63.18(g) requires no response from the applicant

 $\left( oldsymbol{g}
ight)$  The applicant is not seeking facilities-based authority under Section

publishing services provided by the operating subsidiaries of SBC. parent of SNET Mobility. No entity or person beneficially owns more than 10 percent of Delaware. SBC's principal businesses consist of local exchange, wireless and directory SNET is wholly-owned by SBC, a corporation organized under the laws of the state of long distance and wireless services provided by the operating subsidiaries of SNET laws of the state of Connecticut. SNET's principal businesses consist of local exchange, SBC's address is as follows: (h) SNET Mobility is wholly-owned by SNET, a corporation organized under the SBC is the ultimate

SBC Communications Inc. 175 East Houston Street San Antonio, TX 78205

- or its other subsidiaries, with the following foreign carriers: Section 63.09(e) of the Commission's Rules, by virtue of the ownership interests of SBC (i) SNET Mobility hereby certifies that it is affiliated, as that term is defined in
- Telkom S.A. is the incumbent telecommunications carrier in South Africa. this consortium, Telkom S.A. was a completely state-owned company. Telkom S.A. SBC owns 60% of the consortium. Before the acquisition by formed between Telekom Malaysia Berhad and SBC owns 30 percent of 1. Telkom South Africa Ltd. ("Telkom S.A.") (South Africa). A consortium
- owns an indirect 40 percent interest in diAx, a relatively new, full-service in the international transport and local access markets in Switzerland. Swiss telecommunications carrier, with far less than 50 percent market share Commission decision approving the merger of SBC and Ameritech 2. diAx Holding AG ("diAx") (Switzerland). SBC, through a joint venture,

non-dominant carrier treatment on the U.S.-Switzerland route market power in Switzerland, and that SBC and its subsidiaries are entitled to Corporation ("Ameritech"), the Commission determined that diAx lacks

- percent interest in MATAV. MagyarCom, Ameritech, and therefore SBC, holds a non-controlling, 29.8 telecommunications operator in Hungary. Through its interest in Telekom, owns approximately 60 percent of MATAV Rt., the incumbent between Ameritech, a wholly-owned subsidiary of SBC, and Deutsche MATAV Rt (Hungary). MagyarCom, a consortium formed indirectly
- entitled to non-dominant regulation on the U.S.-Netherlands route possess market power in the Netherlands, and that SBC subsidiaries are SBC/Ameritech Order, the Commission held that BEN Netherland does not the international transport and local access markets in the Netherlands. In the services in the Netherlands, and has far less than a 50 percent market share in of the Commission's rules.) BEN Netherland provides GSM 1800 wireless Belgacom S.A. does not constitute an affiliation as defined in Section 63.09(e) non-controlling interest in BEN Netherland. (Ameritech's interest in its interests in Tele Danmark and Belgacom S.A., Ameritech owns an indirect, BEN Netherlands B.V. ("BEN Netherland") (the Netherlands). Through
- international telecommunications services to the public. Denmark authorized to provide, among other services, local exchange and Tele Danmark. Tele Danmark is a full service telecommunications carrier in through an indirect subsidiary, a 41.6 percent, de facto controlling interest in Tele Danmark A/S ("Tele Danmark") (Denmark). Ameritech holds
- local access and transport markets in Norway. NetCom is a wireless carrier with less than 50 percent market share of the Ameritech has an effective interest of approximately 28.1 percent in NetCom. interest in NetCom. Tele Danmark owns 20.4 percent of NetCom. NetCom GSM ("NetCom") (Norway). Ameritech owns a 19.6 percent Therefore,
- controlling interest in Talkline. Talkline is authorized to provide mobile wholly-owned by Tele Danmark. Consequently, Ameritech holds an indirect Talkline GmbH ("Talkline") (Germany and the Netherlands). Talkline is

<sup>&</sup>lt;sup>1</sup> In re Ameritech Corp. and SBC Communications Inc., 14 FCC Rcd. 14,712 (Oct. 8, 1999) ("SBC/Ameritech Order")

<sup>&</sup>lt;sup>2</sup> <u>Id.</u> at ¶ 533.

 $<sup>^3</sup>$  Id. at ¶ 537.

subsidiaries are entitled to regulation as non-dominant carriers along the U.S.-Germany and U.S.-Netherlands routes.<sup>4</sup> Netherlands. In the SBC/Ameritech Order, the Commission held that Talkline international transport and local access markets in Germany and the communications services in Germany and resold cellular service in the lacks market power in Germany and the Netherlands, and that SBC Netherlands. Talkline has far less than a 50 percent market share of the

- Lithuania, and that SBC subsidiaries are entitled to regulation as non-dominant carriers on the U.S.-Lithuania route.<sup>5</sup> international transport and local access markets in Lithuania. In the services in Lithuania, and has far less than a 50 percent market share in the indirect, controlling interest in Bite. Bite is authorized to provide wireless owned subsidiary of Tele Danmark. Consequently, Ameritech holds an SBC/Ameritech Order, the Commission held that Bite lacks market power in UAB Mobilios Telekomunikacijos ("Bite") (Lithuania). Bite is a wholly-
- market power in Canada, and (3) ACI and AMCI therefore are entitled to nonand Ameritech Mobile Communications, Inc. (subsidiaries of SBC) notified and therefore became a foreign carrier, as that term is defined in Section authorization to provide international telecommunications services in Canada. SBC holds a controlling interest in ACII. Last year, ACII received is an indirect, wholly owned subsidiary of Ameritech. As a consequence, apparently agrees that ACII lacks market power in Canada because the dominant treatment along the U.S.-Canada route. 6 The Commission Communications, Inc.) had become a foreign carrier in Canada, (2) ACII lacks the Commission that: (1) ACII (a wholly-owned subsidiary of Ameritech access market in Canada. On June 30, 1999, Ameritech Communications, Inc 63.09(d). ACII has a minuscule share of the international transport and local the U.S.-Canada route Commission has not imposed dominant carrier status on ACI and AMCI along Ameritech Communications International, Inc. ("ACII") (Canada). ACII

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<sup>&</sup>lt;sup>5</sup> <u>Id</u>. at ¶ 538

<sup>96-441,</sup> ITC-96-272, ITC-97-298 (filed June 30, 1999); Ameritech Mobile International, Inc. as a Foreign Carrier in Canada, FCC File No. ITC-96-243 (filed June Communications International, Inc. as a Foreign Carrier in Canada, FCC File Nos. ITC-Communications, Inc. Certification of Status of its Affiliate, Ameritech Communications Ameritech Communications, Inc. Certification of Status of its Affiliate, Ameritech

<sup>&</sup>lt;sup>7</sup> Foreign Participation Order, 12 FCC Rcd. 23891, ¶¶ 161-162 (1997)

have market power and SBC is entitled to a presumption of non-dominance along the U.S.-Norway route.<sup>9</sup> Norwegian market. SBC recently notified the Commission of its affiliation with ETO.<sup>8</sup> Consequently, the Commission has not vet considered whether of ETO, which provides competitive fixed network, broadband and internet its notification, due to its low share of the Norwegian market, ETO does not ETO possesses market power in Norway. Nevertheless, as SBC pointed out in services in Norway. ETO currently serves a minuscule share of the 10. EITele Ost ("ETO") (Norway). Tele Danmark owns a 51 percent interest Consequently, the Commission has not yet considered whether

SNET Mobility hereby certifies that it is not a foreign carrier in any country.

destination countries in which SBC, an entity which own greater than 25 percent of percent of SNET Mobility. SNET Mobility further certifies that it seeks to serve certain SNET Mobility, controls foreign carriers. These foreign carriers and destination foreign carrier or controls a foreign carrier, and (2) no foreign carriers own more than 25 telecommunications services to any destination country in which SNET Mobility is a SNET Mobility hereby certifies that: (1) it does not seek to provide international (j) Pursuant to section 63.18(j) of the Commission's rules, 47 C.F.R. § 63.18(j),

Denmark (Tele Danmark);

countries are:

- Germany (Talkline);
- 3. Netherlands (Talkline);
- 4. Lithuania (Bite);
- Canada (ACII);

Report No. FCN-00014, Feb. 11, 2000). Affiliation, FCC File No. FCN-NEW-20000120-00002 (public notice of notification, Southwestern Bell Communications Services, Inc., et. al, Notification of Foreign

### 6. Norway (ETO);

(k) Pursuant to section 63.18(k) of the Commission's rules, for each of the

destination countries listed in subsection (j) of this application, SNET Mobility provides the following information:

- $\Xi$ Organization. Tele Danmark (Denmark). Denmark is a member of the World Trade
- (2) Talkline lacks market power in Germany and the Netherlands. 11 local access markets in Germany and the Netherlands, and therefore is presumed not to have market power in Germany and the Netherlands.<sup>10</sup> far less than 50 percent market share of the international transport and Additionally, as noted above, the Commission has already concluded that Netherlands are members of the World Trade Organization. Talkline has Talkline (Germany and the Netherlands). Both Germany and the
- (3)therefore is presumed not to possess market power in any relevant market on the U.S.-Lithuania route. <sup>12</sup> For this reason, the Commission has already adversely in the United States. concluded that Bite lacks sufficient market power to affect competition in the international transport and local access markets in Lithuania, and Organization. However, Bite has far less than a 50 percent market share Bite (Lithuania). Lithuania is not a member of the World Trade
- 4 not to possess market power in any relevant market on the U.S.-Canada route. <sup>13</sup> In addition, as noted in section (i)(8) of this application, the transport and local access markets in Canada, and therefore is presumed power in Canada. Commission apparently already has concluded that ACII lacks market ACII is a nascent carrier with far less than 50 percent of the international ACII. (Canada). Canada is a member of the World Trade Organization.

Footnote continued from previous page

<sup>10</sup> Foreign Participation Order, 12 FCC Rcd 23891, 23955-65, ¶¶ 150-70 (1997).

<sup>&</sup>lt;sup>9</sup> <u>Id</u>. at 4-5.

<sup>11</sup> SBC/Ameritech Order, at ¶ 537.

<sup>&</sup>lt;sup>12</sup> Foreign Participation Order, 12 FCC Rcd 23891, 23955-65, ¶¶ 150-70 (1997).

<sup>13</sup> Id.

 $\odot$ not to possess market power in any relevant market on the U.S.-Norway route. 14 transport and local access markets in Norway, and therefore is presumed ETO is a nascent carrier with a miniscule share of the international ETO (Norway). Norway is a member of the World Trade Organization.

quarterly traffic reports required by Section 43.61(c) of the Commission's Rules information with respect to the foreign carriers with which it has an affiliation and as to has a foreign affiliation as defined by Section 63.09(e) of the Commission's Rules Norway, the Netherlands, Denmark, Germany, Canada and Lithuania — SNET Mobility which it either satisfies Section 63.10(a)(3) of the Commission's Rules or files the Pursuant to Section 63.18(1) of those Rules, SNET Mobility provides the following communications services. In nine countries unaffiliated U.S. carriers for the purpose of providing global international (0) SNET Mobility proposes to resell the international switched services of South Africa, Switzerland, Hungary,

markets on the foreign end of the route, SNET Mobility will satisfy Section 63.10(a)(3) other than those to South Africa, Denmark and Hungary. of the Rules for all international communications services covered by this application, Rt, lack 50 percent market share in the international transport and the local access Mobility's foreign affiliated carriers, except Telkom S.A., Tele Danmark, and MATAV the international switched services of an unaffiliated U.S. carrier. Since all of SNET On all international routes SNET Mobility will provide service solely via resale of With respect to those three

<sup>&</sup>lt;sup>14</sup> <u>Id.</u>

43.61(c) of the Rules countries, SNET Mobility will file the quarterly traffic reports required by Section

Canada, and Lithuania, for the following reasons: South Africa, Switzerland, Hungary, Norway, the Netherlands, Denmark, Germany, treated as non-dominant for the provision of the international communications services to the standards set forth in Section 63.10 of those Rules, SNET Mobility requests that it be (m) Pursuant to Section 63.18(m) of the Commission's Rules, and in accord with

- unaffiliated U.S facilities-based carriers' international switched services international communications service to South Africa through the resale of an SNET Mobility will satisfy Section 63.10(a)(4) for the provision of
- services which are covered by this application. 63.10(a)(3) of the Commission's Rules for all international communications access markets in Switzerland and thus SNET Mobility will satisfy Section 2. diAx lacks 50 percent market share in the international transport and local
- international communications service to Hungary through the resale of an unaffiliated U.S facilities-based carriers' international switched services SNET Mobility will satisfy Section 63.10(a)(4) for the provision of
- services which are covered by this application. 63.10(a)(3) of the Commission's Rules for all international communications access market in the Netherlands and thus SNET Mobility will satisfy Section BEN lacks 50 percent market share in the international transport and local
- international transport and local access market in Norway and thus SNET international communications services which are covered by this application Mobility will satisfy Section 63.10(a)(3) of the Commission's Rules for all NetCom is a wireless carrier which lacks 50 percent market share in the
- unaffiliated U.S. facilities-based carriers' international switched services international communications service to Denmark through the resale of an SNET Mobility will satisfy Section 63.10(a)(4) for the provision of
- percent of the market share of the international transport and local access customers to different mobile operators' networks, and has far below 50 Talkline provides mobile communications services by connecting

communications services which are covered by this application. Section 63.10(a)(3) of the Commission's Rules for all international markets in Germany and the Netherlands and thus SNET Mobility will satisfy

- percent market share in the international transport and local access markets in covered by this application. Commission's Rules for all international communications services which are Lithuania and thus SNET Mobility will satisfy Section 63.10(a)(3) of the Bite provides only mobile wireless communications services and lacks 50
- and thus SNET Mobility will satisfy Section 63.10(a)(3) of the Commission's market share in the international transport and local access markets in Canada term is defined in Section 63.09(d). ACII has a minuscule share of the services in Canada last year, and therefore became a foreign carrier, as that Rules for all international communications services which are covered by this international transport and local access market in Canada and lacks 50 percent ACII received authorization to provide international telecommunications
- international communications services which are covered by this application Mobility will satisfy Section 63.10(a)(3) of the Commission's Rules for all services in Norway, has far below 50 percent of the market share of the international transport and local access markets in Norway and thus SNET 10. ETO, which provides competitive fixed network, broadband and internet
- of the route and will not enter into such agreements in the future international route where the foreign carrier possesses market power on the foreign end concessions directly or indirectly from any foreign carrier with respect to any U.S (n) SNET Mobility hereby certifies that it has not agreed to accept special
- 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. § 862), of SNET Mobility. Section 5301 of the Anti-Drug Abuse Act of 1988. Attached hereto is a certification, SNET Mobility is not subject to a denial of Federal benefits pursuant to

presumption of non-dominance under Section 63.10(a)(4) of the Commission's Rules as services (either directly or indirectly through resale of another U.S. resale carrier's through the resale of an unaffiliated U.S. facilities-based carrier's international switched the international service which is the subject of this application would be provided solely the Netherlands, Denmark, Canada, and Germany, these affiliated destination markets are international switched services). World Trade Organization member countries and SNET Mobility qualifies for a within the meaning of Section 63.09(e) in South Africa, Switzerland, Hungary, Norway, Commission's Rules because, although SNET Mobility is affiliated with foreign carriers application qualifies for streamlined processing pursuant to Section 63.12 of the (p) The Applicant requests streamlined processing of this application. This

lacks market power in the destination market. 15 meaning of Section 63.09(e) in Lithuania, the Commission has previously found that Bite In addition, although SNET Mobility is affiliated with a foreign carrier within the

<sup>&</sup>lt;sup>15</sup> <u>Id</u>. at ¶¶ 534-538

#### IV. CONCLUSION

grant this application. In view of the foregoing, the applicant respectfully requests that the Commission

Respectfully submitted,

SNET MOBILITY, INC.

DATE: 5/16/00

### SECTIONS 1.2001–1.2003 OF THE COMMISSION'S RULES **CERTIFICATION PURSUANT TO**

stock or shares (voting and/or non-voting) of SNET Mobility is subject to a denial of or directors, nor any of the shareholders holding 5 percent or more of the outstanding federal benefits that include FCC benefits pursuant to Section 5301 of the Federal Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862. §§ 1.2001-1.2003, SNET Mobility hereby certifies that neither it, nor any of its officers Pursuant to Sections 1.2001-1.2003 of the Commission's Rules, 47 C.F.R.

SNET MOBILITY, INC.

DATE: S/16/00