

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: _____

1

COPY

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

JUN 08 2000

ATTORNEYS AT LAW
SECOND FLOOR

1919 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006-3458
(202) 659-9750

ALAN RAYWID
(1930-1991)

OF COUNSEL
FRANCES J. CHETWIND
ELLEN S. DEUTSCH

FACSIMILE
(202) 452-0067
INTERNET
WWW.CRBLAW.COM

June 8, 2000

JOHN P. COLE, JR.
BURT A. BRAVERMAN
ROBERT L. RAVERMAN
JOHN D. SEVERANCE
WESLEY R. HEPLER
PAUL GLUST
DAVID M. SILVERMAN
JAMES F. IRELAND, III
MAURITA K. COLEY
STEVEN J. HORVITZ
CHRISTOPHER W. SAVAGE**
ANN FLOWERS
ROBERT G. SCOTT, JR.
SUSAN WHELAN WESTFALL
TERESA A. ZETTERBERG
KARLYN D. STANLEY
JOHN DAVIDSON THOMAS
JOHN C. DODGE
JEREMY H. STERN
MARIA T. BROWNE
DONNA C. RATTLE
EDWARD L. DONOHUE***
FREDERICK W. GIROUX
GEOFFREY C. COOK
THOMAS SCOTT THOMPSON
ADAM S. CALDWELL...
WILLIAM F. BLY*
SANDRA GREINER GIBBS
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SARA J. KIERNAN*
HEIDI C. PEARLMAN
ERIK J. CECIL*
BRENDA J. BOYKIN
ROBERT JYSTAD*
DAVID N. TOBENKIN**
RACHAEL A. GALLOO*
LAURA G. SCHLOSS
BRIAN M. JOSEF*
KEVIN C. HALM*
TERENCE S. COOKE****
CHRISTOPHER W. HEMBREE*
GENEVEVE D. SAPIR*

* ADMITTED IN OKLAHOMA ONLY
** ADMITTED IN FLORIDA ONLY
* ADMITTED IN CALIFORNIA ONLY
* 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 TUN International Networks Ltd.
For Global Authority Pursuant to Section 214 of the Communications Act of 1934,
as amended, to Operate as an International Facilities-Based and Resale Carrier
Between the United States and Various International Points**

Dear Secretary Salas:

Enclosed are an original and (5) five copies of the Application of TUN International Networks Ltd. 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

June 8, 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,

A handwritten signature in cursive script, appearing to read 'Karlyn D. Stanley', written in black ink.

Karlyn D. Stanley

Counsel for TUN International Networks Ltd.

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

READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE

APPROVED BY OMB 3060-0589

PAGE NO. 1 OF 1

(1) LOCKBOX #

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

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

(4) STREET ADDRESS LINE NO. 1
1919 PENNSYLVANIA AVENUE, NW

(5) STREET ADDRESS LINE NO. 2
SUITE 200

(6) CITY
WASHINGTON

(7) STATE
DC

(8) DAYTIME TELEPHONE NUMBER (include area code)
202-659-9750

(9) ZIP CODE
20006

(10) COUNTRY CODE (if not in U.S.A.)
USA

**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)
TUN INTERNATIONAL NETWORKS, LTD.

(12) STREET ADDRESS LINE NO. 1
87 HOBART DRIVE, NORTH YORK

(13) STREET ADDRESS LINE NO. 2

(14) CITY
TORONTO

(15) STATE
ONTARIO

(16) ZIP CODE
M2J3J8

(17) DAYTIME TELEPHONE NUMBER (include area code)
416-756-7700

(18) COUNTRY CODE (if not in U.S.A.)
CANADA

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

FCC USE ONLY

(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
\$

FCC USE ONLY

(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
\$

FCC USE ONLY

(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
\$

FCC USE ONLY

(23D) FCC CODE 1

(24D) FCC CODE 2

SECTION D - TAXPAYER INFORMATION (REQUIRED)

(25) PAYER TIN
0 5 2 0 8 2 0 0 7 1

(26) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-11 IS DIFFERENT FROM PAYER NAME IN A-2
APPLICANT TIN
0 8 8 9 0 4 0 5 2 3

SECTION E - CERTIFICATION

(27) CERTIFICATION STATEMENT
I, KARLYN D. STANLEY

, Stanley, Certify under penalty of perjury that the foregoing and supporting information

(PRINT NAME)

are true and correct to the best of my knowledge, information and belief. SIGNATURE

(28)

MASTERCARD/VISA ACCOUNT NUMBER:

SECTION F - CREDIT CARD PAYMENT INFORMATION

EXPIRATION DATE:

MASTERCARD

MONTH YEAR

VISA

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

AUTHORIZED SIGNATURE

DATE

SEE PUBLIC BURDEN ESTIMATE ON REVERSE

FCC FORM 159 JULY 1997 (REVISED)

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

In the Matter of

TUN International Networks Ltd.

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

File No. _____

APPLICATION

TUN International Networks Ltd. (“TUN” or “Applicant”) hereby requests “global” 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 (1998), to provide international telecommunications services between the United States and international points.

I. The Proposed International Services

TUN is a start-up company incorporated in Toronto, Canada and holds a Class A license of international telecommunications service from the Canadian Radio-television and Telecommunications Commission (CRTC). TUN plans to expand its business plans to include the U.S. market by offering affordable voice, calling card, data, Internet and network-based application services, on an integrated basis, to both residential and

business customers in the U.S. TUN has no foreign affiliations. TUN requests two types of authority in this Application, both of which are eligible for streamlined processing. TUN specifically requests: (1) global facilities-based authority pursuant to § 63.18 (e)(1) of the Commission's rules and (2) Global resale authority pursuant to § 63.18 (e)(2) of the Commission's rules.

Granting TUN's application will serve the public interest, convenience and necessity by promoting competition in the international services market. TUN's entrance into the U.S. 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.

II. Information Required Under Section 63.18

- a) Applicant's name, address and telephone number:
- TUN International Networks Ltd.
87 Hobart Drive, North York
Toronto, Ontario M2J 3J8
Canada
(416) 756-7700
- b) TUN International Networks Ltd. is a corporation organized under the laws of Canada.
- c) Correspondence concerning the application should be sent to:

David Wu, Manager
TUN International Networks Ltd.
87 Hobart Drive, North York
Toronto, Ontario M2J 3J8
Canada
(416) 756-7700

with copies of all correspondence to:

Karlyn D. Stanley
Cole, Raywid & Braverman, L.L.P.
1919 Pennsylvania Avenue, NW
Suite 200
Washington, DC 20006

- d) TUN International Networks Ltd. has not previously received authority under Section 214 of the Communications Act, as amended.
- e) TUN International Networks Ltd. 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. TUN International Networks Ltd. 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) TUN International Networks Ltd. 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. TUN International Networks, Ltd. 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, TUN International Networks Ltd. 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 TUN International Networks Ltd.:

(1) Xu Feng, President
TUN International Networks Ltd.
87 Hobart Drive, North York

Toronto, Ontario M2J 3J8
Canada
(416) 756-7700

Principal Business: President and Secretary of TUN International Networks Ltd., a telecommunications company.

Citizenship: Canada

Percentage of Equity owned: 100%

There are no interlocking directorates with foreign carriers.

- i) TUN International Networks Ltd. certifies that it is not affiliated with any foreign or U.S. facilities-based carrier.
- j) TUN International Networks Ltd. 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, Xu Feng the only owner of more than 25% of Applicant's equity, does not control any foreign carriers. No other person or entity controls the Applicant.
- k) TUN International Networks Ltd. has no affiliation with and is not a foreign carrier in any country to which it plans to provide service. Further, TUN International Networks Ltd. plans to provide international telecommunications service solely through the resale of an unaffiliated U.S. facilities-based carrier's international switched services. Thus, TUN International Networks Ltd. 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) TUN International Networks Ltd. 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 TUN International Networks Ltd. may serve under authority granted hereunder.

m) TUN International Networks Ltd. certifies that, to the best of its knowledge, information and belief, neither TUN International Networks Ltd. nor any party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

n) The Applicant desires streamlined processing pursuant to § 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 qualifies for a presumption of non-dominance under Section 63.10(a)(4).

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

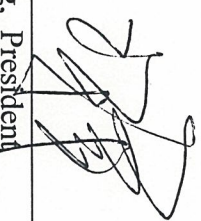
Rebecca Abrogast
Chief, Telecommunications Division
International Bureau, Federal Communications Commission
445 12th St., SW
Suite 6-A767
Washington, D.C. 20554

In conclusion, TUN International Networks Ltd. certifies that all of the information in this application is accurate and correct.

Respectfully submitted,

TUN INTERNATIONAL NETWORKS LTD.

By:



Xu Feng, President

TUN International Networks Ltd.
87 Hobart Drive, North York
Toronto, Ontario M2J 3J8
Canada
(416) 756-7700

Date:

June 4, 2000

0901647-95

TO THE
ORDER
OF

FEDERAL COMMUNICATIONS
COMMISSION



⑈063662⑈ ⑆054001204⑆ 002086050069⑈

PAY

SEVEN HUNDRED EIGHTY AND 00/100 DOLLARS*****

CHECK AMOUNT

063662 06/07/00 FCC

COLE, RAYWID & BRAVERMAN, L.L.P.
1919 PENNSYLVANIA AVENUE N.W.
WASHINGTON, DC 20006-3458

CHECK NO. CHECK DATE VENDOR NO.

BANK OF AMERICA
02992 DC
15-120-540

63662

780.00

27661 060700 6/07/00 780.00
Check total 780.00
Ref: FILING FEE/2283.01

OUR REF. NO.	YOUR INVOICE NUMBER	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN
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VENDOR: FCC FEDERAL COMMUNICATIONS CHECK NO: 063662

63662

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

Security features included. Details on back.