Streamlined
ITMG, LLC

ITC-214-20000622-00396

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: _____

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Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of	)	
	)	
ITMG, LLC	)	
	)	
Application for Authority Pursuant to	)	**File No. I-T-C-_____**
Section 214 of the Communications Act	)	
of 1934, as Amended, for Global Authority	)	
to Operate as an International	)	
Facilities-Based and Resale Carrier	)	

APPLICATION

ITMG, LLC ("ITMG"), by the undersigned counsel, hereby requests authority, pursuant to 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 global international facilities-based and resale services between the United States and international points. ITMG respectfully requests streamlined, expedited treatment of this application, pursuant to the Commission's Report and Order, released March 23, 1999, in CC Docket No. 98-118, 1998 Biennial Regulatory Review -- Review of International Common Carrier Regulations, 14 FCC Rcd. 4909 (1999), and Section 63.12 of the Commission's Rules, 47 C.F.R. §63.12. Because grant of this Application will further enhance competition in the international services market, ITMG submits that the public interest, convenience and necessity would be served by a grant of this Application.

I.

INFORMATION REQUIRED BY SECTION 63.18

In support of ITMG's request for Section 214 authority, the following information is submitted pursuant to Section 63.18 of the Commission's Rules, 47 C.F.R. §63.18:

(a) Name and Address of Applicant

ITMG, LLC
920 Providence Road, Suite 304
Baltimore, MD 21286
Telephone: (410) 337-2426
Facsimile: (410) 337-0726

(b) ITMG is a limited liability company organized under the laws of the State of Maryland.

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

Chris Haug
ITMG, LLC
920 Providence Road, Suite 304
Baltimore, MD 21286
Telephone: (410) 337-2426
Facsimile: (410) 337-0726

with a copy to:

Hunter Communications Law Group, P.C.
1620 I Street, N.W., Suite 701
Washington, D.C. 20006
Telephone: (202) 293-2500
Facsimile: (202) 293-2571

Attention: Catherine M. Hannan

(d) ITMG has not previously received authority under Section 214. Following receipt of the Section 214 authority requested herein, ITMG will provide international basic switched, private line, data, television and business services by acquiring and operating common carrier and non-common carrier facilities. ITMG will also provide international basic switched, private line, data, television and business services by reselling the international services of authorized U.S. common carriers. Pursuant to Section 63.07 of the Commission's Rules, 47 C.F.R. §63.07, and the policies announced by the Commission in its Second Report and Order in Policy and Rules Concerning Rates for Competitive Common Carrier Services and Facilities Therefor,[1] ITMG is authorized to operate as a nondominant domestic interstate common carrier.

(e) ITMG is requesting Section 214 authority to operate as a facilities-based carrier pursuant to the terms and conditions of Sections 63.18(e)(1) and 63.21, 47 C.F.R.§§63.18(e)(1), 63.21; and to operate as a resale carrier pursuant to the terms and conditions of §63.18(e)(2), 47 C.F.R. §63.18. In connection therewith, ITMG certifies that it will comply with the terms and conditions contained in §§ 63.21, 63.22 and 63.23 of the Commission's Rules.

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[1] 91 F.C.C.2d 187 (1982), recon. denied, 93 F.C.C.2d 54 (1983), Third Report and Order, 48 Fed. Reg. 46,791 (1983), Fourth Report and Order, 95 F.C.C.2d 554 (1983), rev'd and remanded sub nom., American Tel. & Tel. v. FCC, 978 F.2d 7272 (D.C.Cir. 1992), cert. denied, S.Ct. Docket # 92-1684,61 U.S.L.W. 3853 (June 21, 1993), Fifth Report and Order, 98 F.C.C.2d 1191 (1984), Sixth Report and Order, 99 F.C.C.2d 1020 (1985), rev'd and remanded sub nom., MCI Telecommunications Corp. v. FCC, 765 F.2d 1186 (D.C.Cir. 1985).

(f) Applicant is applying for both global facilities-based and global resale authority.

(g) Not applicable.

(h) Ownership information regarding holders of ten percent (10%) or greater interests in ITMG is attached hereto as Exhibit A. ITMG has no interlocking directorates with any foreign carrier.

(i) ITMG certifies that it is not, and is not affiliated with, a foreign carrier.

(j) ITMG certifies that it does not seek to provide international telecommunications services to any destination country in which (1) it is a foreign carrier, (2) it controls a foreign carrier in that country, (3) it is controlled or more than 25% owned by an entity that controls a foreign carrier in that country, or (4) it is owned, in the aggregate, more than 25% by two or more foreign carriers (or parties that control foreign carriers) which are parties to, or the beneficiaries of, a contractual relation (e.g., a joint venture or market alliance) affecting the provision or marketing of international basic telecommunications services in the United States.

(k) Not applicable.

(l) Not applicable.

(m) Not applicable.

(n) ITMG 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.

(o) In accordance with the Anti-Drug Abuse Act of 1988, see 21 U.S.C. §853a, the certification of ITMG is attached hereto in Exhibit B. See 47 C.F.R. §1.2001, et seq.

(p) This application qualifies for streamlined processing pursuant to § 63.12 of the Commission's Rules because Applicant is neither a foreign carrier nor affiliated with a foreign carrier and accordingly, is presumptively nondominant under § 63.10(a)(1).

II.
Public Interest Statement

The public interest, convenience and necessity will be served by a grant of this Application. Clear Commission policies favor competition in general[2] and international competition in particular.[3] The Commission has long recognized that facilities-based and resold telecommunications services generate additional competition in the international telecommunications marketplace and that such increased competition benefits U.S.

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[2] Resale and Shared Use of Common Carrier Services, 60 F.C.C.2d 261 (1976), recon. 62 F.C.C.2d 588 (1977), aff'd sub nom. American Tel. & Tel. Co. v. FCC, 572 F.2d 17 (2d Cir.), cert. denied, 439 U.S. 875 (1978); Resale and Shared Use of Common Carrier Services, 83 F.C.C.2d 167 (1980), recon. 86 F.C.C.2d 820 (1981).

[3] Regulation of International Accounting Rates, Phase II, 7 FCC Rcd. 559 (1990).

ratepayers.[4] The Commission has held that authority to provide these services will serve the public interest by aiding the "efficient and rapid provision of international services."[5] It is for this reason that the Commission routinely grants applications for Section 214 authorization to provide facilities-based and resold international services. Indeed, in furtherance of its international pro-competitive goals, the Commission has streamlined the application process for unopposed applications for Section 214 resale authority.[6] Grant of this Application is consistent with the Commission's ongoing efforts to increase competition in the international telecommunications marketplace.

III.

CONCLUSION

By reason of the foregoing, ITMG submits that the public interest, convenience and necessity would be served by grant of this Application for authority, pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C.

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[4] Via USA, Ltd. and Telegroup, Inc., FCC 94-86, File Nos. I-F-C-93-031 & I-T-C-93-050 (May 11, 1994), recon., 10 FCC Rcd. 9540, released June 15, 1995.

[6] Direct Net Telecommunications Application for Authorization Pursuant to Section 214 of the Communications Act of 1934, as Amended, to Provide Facilities-Based and Resold Switched and Private Line Services Between the united States and All International Points ("Order, Authorization and Certificate"), ITC-97-094, DA 97-938 (released May 6, 1997).

[7] See 47 C.F.R. § 63.12.

§214, and Section 63.18 of the Commission's Rules, 47 C.F.R. §63.18, to provide global facilities-based and resale services between the United States and international points.

Respectfully submitted,

ITMG, LLC

By: Catherine M. Hannan

Catherine M. Hannan
Hunter Communications Law Group, P.C.
1620 I Street, N.W., Suite 701
Washington, D.C. 20006
(202) 293-2500

June 22, 2000

Its Attorneys

EXHIBIT A

Ownership Information of
ITMG, LLC

Interlude, LLC currently owns 100% of ITMG, LLC. Interlude, LLC is located at the following address:

Interlude, LLC
920 Providence Road, Suite 340
Baltimore, MD 21286
Telephone: (410) 337-2426
Facsimile: (410) 337-0726

There is no natural person that owns a 10% or greater interest of ITMG, LLC or Interlude, LLC.

EXHIBIT B

Drug Certification and Verification of
ITMG, LLC

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

STATE OF MARYLAND)
) ss.
COUNTY OF BALTIMORE)

VERIFICATION

I, Chris Haug, Chief Financial Officer of ITMG, LLC, am authorized to make this verification on behalf of ITMG, LLC. The statements made in the foregoing document are true, complete, and correct to the best of my knowledge and are made in good faith.

ITMG, LLC

By: _____
Chris Haug, Chief Financial Officer

Subscribed and sworn to before me, in and for the State and County named above this 21st day of June, 2000.

_____
Notary Public

My Commission expires 2/1/02