

**Categories of Services for 214 Applications
(Streamlined/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: _____



Davis Wright Tremaine LLP

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PORTLAND SAN FRANCISCO SEATTLE WASHINGTON, D.C. SHANGHAI

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VIA HAND DELIVERY

July 5, 2000

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

Re: Urban Media Long Distance, Inc.'s Application 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

REQUEST TO WITHHOLD MATERIALS FROM PUBLIC INSPECTION

Dear Secretary Salas:

Enclosed for filing are an original and five copies of Urban Media Long Distance, Inc.'s ("UMLD") application for authority pursuant to Section 214 of the Communications Act of 1934, as amended, to operate as an international facilities-based and resale carrier.

Also enclosed is FCC Form 159 and the filing fee of \$780 (Fee Code CUT). Please date stamp and return to the messenger the attached return copy.

All questions and correspondence regarding this filing should be referred to:

Holly R. Smith
Davis Wright Tremaine
1500 K Street, N.W., Suite 450
Washington, D.C. 20005-1272
Telephone: (202) 508-6625
Facsimile: (202) 508-6699
E-Mail: hollysmith@dwtr.com

Secretary Magalie Roman Salas
July 5, 2000
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Margaret L. Tobias
Urban Media
One Kaiser Plaza, Suite 1350
Oakland, CA 94612
Telephone: (510) 330-0320
Facsimile: (510) 303-0336
E-Mail: mtobias@urbanmedia.com

Pursuant to Section 0.459 of the Federal Communications Commission's ("Commission") Rules, 47 C.F.R. § 0.459, UMLD requests confidential treatment of Exhibit 1 to its Application 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 ("Application"). Exhibit 1 contains information regarding UMLD's shareholders, which is not otherwise available to the public. Furthermore, UMLD requests notification if this request is denied prior to the Application being made available to the public. UMLD supports this request as detailed below.

Specific Information For Which Applicant Requests Confidential Treatment: UMLD considers the response it included in Exhibit 1 concerning 47 C.F.R. § 63.18(h) to be confidential and privileged and requests that the Commission withhold it from public inspection ("Information").

Circumstances Giving Rise to Filing: As a new carrier, UMLD filed its Application to obtain authority to serve as a facilities-based and resale international carrier. To comply with rules governing the Application process, UMLD submitted Information in response to 47 C.F.R. § 63.18(h).

Degree To Which Information Is Confidential: The Information is confidential and privileged as it concerns financial and organizational information of the Applicant and its parent company. This Information is highly confidential because UMLD and its parent are privately held companies and this Information is not generally available to the public.

Explanation of the degree to which the information concerns a service: The Information concerns Applicant's ability to provide competitive international services. UMLD would not make the Information publicly available unless required to do by the Commission.

Explanation of how disclosure of the information could result in substantial competitive harm: In a competitive marketplace, the disclosure of UMLD's and its parent company financial information could harm their ability to conduct business and to raise needed capital.



Secretary Magalie Roman Salas

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Identification of any measures taken by the submitting party to prevent unauthorized disclosure: Applicant has not released the Information it included in its response to 47 C.F.R. § 63.18(l) to the public prior to submitting this application. Applicant and its parent have established internal procedures designed to prevent unauthorized disclosure of this and other confidential and proprietary information. As such, only authorized persons of the Applicant and its parent company have access to the Information and such persons are obligated to safeguard and keep the Information confidential.

Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties: Neither Applicant nor its parent company have released the Information to the public, and as such, Applicant submits that the Information is not available to the public or to third parties.

Justification of the period during which the submitting party asserts that material should not be available for public disclosure: Applicant requests that the Commission maintain the confidential information described herein until the Applicant discloses the information to the public. Under no circumstances should the Information be disclosed to the public in less than three years from the submission of the Application.

Any other information that the party seeking confidential treatment believes may be useful in assessing: As noted previously, UMLD submitted the Information only because it is required to do so by the Commission's rules. UMLD would not otherwise disclose the Information to the public, any government entity or third parties.

Please do not hesitate to contact the undersigned if you should have questions concerning this request.

Very truly yours,

Davis Wright Tremaine LLP

Holly Rachel Smith

Counsel for Urban Media Long Distance, Inc.

Enclosures

cc: Fran Eisenstein (with confidential Exhibit 1)
International Bureau, Telecommunications Division
Policy and Facilities Branch
2000 M Street, N.W. Room 800
Washington, DC 20554

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of:

Urban Media Long Distance, Inc.'s
Application 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

**APPLICATION OF URBAN MEDIA LONG DISTANCE, INC.
FOR AUTHORITY TO OPERATE AS AN INTERNATIONAL
FACILITIES-BASED AND RESALE CARRIER**

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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:

Urban Media Long Distance, Inc.'s
Application 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

**APPLICATION OF URBAN MEDIA LONG DISTANCE, INC.
FOR AUTHORITY TO OPERATE AS AN INTERNATIONAL
FACILITIES-BASED AND RESALE CARRIER**

I. PREAMBLE

Urban Media Long Distance, Inc. ("UMLD" or "Applicant"), hereby requests authority, pursuant to § 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214 (1982), ("§ 214") and Section 63.18 of the Federal Communications Commission's ("Commission") Rules, 47 C.F.R. § 63.18, to provide global international facilities-based and resale services between the United States ("U.S.") and international points ("Application"). As detailed herein, UMLD requests streamlined treatment of its Application and requests that Exhibit 1 to it Application be withheld from public inspection.

UMLD is a U.S. company, organized under the state laws of Delaware, to provide, among other services, international telecommunications services. UMLD is not presently a foreign carrier and it has no foreign affiliations. UMLD intends to serve customers throughout the U.S. By granting this Application, the Commission will serve the public interest, convenience and necessity by promoting competition in the international

services market. Competition will benefit U.S. consumers by increasing service options and lowering prices.

II. COMPLIANCE WITH 47 C.F.R. § 63.18

The following information is submitted, as required by 47 C.F.R. § 63.18 of the Commission's rules, in support of UMLD's request for authorization.

A. 47 C.F.R. § 63.18(a)

Urban Media Long Distance, Inc.
101 University Avenue, Suite 400
Palo Alto, CA 94301
Telephone: (650) 330-7430
Facsimile: (650) 833-5415

B. 47 C.F.R. § 63.18(b)

UMLD is a corporation organized under the state laws of Delaware.

C. 47 C.F.R. § 63.18(c)

All correspondence concerning this Application should be sent to the following persons:

Margaret L. Tobias
Urban Media
One Kaiser Plaza, Suite 1350
Oakland, CA 94612
Telephone: (510) 330-0320
Facsimile: (510) 303-0336
E-Mail: mtobias@urbannmedia.com

Holly R. Smith
Davis Wright Tremaine
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Washington, D.C. 20005-1272
Telephone: (202) 508-6625
Facsimile: (202) 508-6699
E-Mail: hollysmith@dwtt.com

D. 47 C.F.R. § 63.18(d)

UMLD has not previously requested or received authority pursuant to § 214 to provide international telecommunications service.

E. 47 C.F.R. § 63.18(e)

Pursuant to Commission Rules 63.22 and 63.23, UMLD requests global facilities-based and resale § 214 authority pursuant to the terms and conditions of 47 C.F.R. §§ 63.18(e)(1) and (e)(2). UMLD certifies that it will comply with the terms and conditions of these rules.

F. 47 C.F.R. §§ 63.18(f) and (g)

At this time, UMLD does not request other authorization available under 47 C.F.R. § 63.18(e) other than that requested above in Section E. As such, Applicant is not required to and did not include an environmental assessment statement.

G. 47 C.F.R. § 63.18(h)

UMLD considers its response to 47 C.F.R. § 63.18(h) to be confidential and requests that it be withheld from public inspection. UMLD submits its response to this Section as Confidential Exhibit 1, attached hereto. UMLD provides support for its request for confidential treatment in the transmittal letter introducing this Application.

H. 47 C.F.R. § 63.18(i)

UMLD certifies it is not affiliated with any foreign carrier(s). In support of this certification, the name, address, citizenship and principal business of the shareholder that controls ten percent or more of UMLD, is as follows:

Sean P. Doherty
Urban Media Long Distance, Inc.
101 University Avenue, Suite 400
Palo Alto, CA 94301
Telephone:(650) 330-7430
Facsimile:(650) 833-5415
Principal Business: CEO communications corporation
Citizenship: U.S.A.

I. 47 C.F.R. § 63.18(j)

UMLD is not a foreign carrier. UMLD certifies that it does not seek to provide international telecommunications service to any country in which it is a

foreign carrier, controls a foreign carrier or where foreign carriers own, in the aggregate, more than 25 percent (25%) of the Applicant.

J. 47 C.F.R. § 63.18(d)

UMLD is not a foreign carrier. Applicant does not propose to resell international switched services to a country where it is a foreign carrier or affiliated with a foreign carrier.

K. 47 C.F.R. § 63.18(n)

UMLD certifies that it has not agreed and will not agree in the future to accept any direct or indirect special concessions from a foreign carrier or administration with regard to traffic or revenue flows between the U.S. and any foreign countries the company is authorized to serve.

L. 47 C.F.R. § 63.18(o)

UMLD certifies that no party to this Application has been denied federal benefits pursuant to § 5301 of the Anti-Drug Abuse Act of 1988.

M. 47 C.F.R. § 63.18(p)

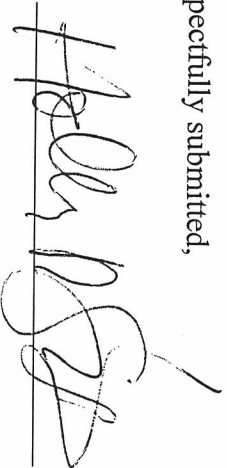
Pursuant to 47 C.F.R. § 63.12, UMLD requests streamlined processing of its Application, as 47 C.F.R. § 63.12(c) is not applicable to UMLD.

III. CONCLUSION

UMLD certifies that all of the information in this Application is accurate and correct. For all of the reasons set forth in this Application, UMLD respectfully request that the Commission grant this Application on a streamlined basis. UMLD also requests that the Commission treat UMLD's response to 47 C.F.R. § 63.18(h), attached as Exhibit 1, as confidential and withhold this Exhibit from public inspection.

Date: July 5, 2000

Respectfully submitted,

By: 

Holly Rachel Smith, Esq.
Davis Wright Tremaine LLP
1500 K Street, N.W., Suite 450
Washington, D.C. 20005-1272
Telephone: (202) 508-6625
Facsimile: (202) 508-6699
E-Mail: hollysmith@dwt.com

READ INSTRUCTIONS CAREFULLY BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE

LOCKBOX # 358115

PAGE NO. 1 OF 1

SECTION A - PAYER INFORMATION

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card)
DAVIS WRIGHT TREMAINE LLP, ATTN: HOLLY R. SMITH

(4) STREET ADDRESS LINE NO. 1
1500 K STREET, NW

(5) STREET ADDRESS LINE NO. 2
SUITE 450

(6) CITY
WASHINGTON

(7) STATE
DC

(9) DAYTIME TELEPHONE NUMBER (include area code)
202-508-6625

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

IF PAYER NAME AND THE APPLICANT NAME ARE DIFFERENT IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEET

SECTION B - APPLICANT INFORMATION

(11) APPLICANT NAME (if paying by credit card, enter name exactly as it appears on your card)
URBAN MEDIA LONG DISTANCE, ATTN: MARGARET I. TOBIT

(12) STREET ADDRESS LINE NO. 1
ONE KAISER PLAZA, SUITE 1350

(13) STREET ADDRESS LINE NO. 2

(14) CITY
OAKLAND

(15) STATE
CA

(17) DAYTIME TELEPHONE NUMBER (include area code)
510-302-0320

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

COMPLETE SECTION C FOR EACH SERVICE. IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET

SECTION C - PAYMENT INFORMATION

(19A) FCC CALL SIGN/OTHER ID	(22A) PAYMENT TYPE CODE (PTC)	(23A) QUANTITY	(22A) FEE DUE FOUR (PTC) IN BLOCK 200
(23A) FCC CODE 1	C	U	T
(23A) FCC CODE 1		1	\$ 780
(19B) FCC CALL SIGN/OTHER ID	(22B) PAYMENT TYPE CODE (PTC)	(23B) QUANTITY	(22B) FEE DUE FOUR (PTC) IN BLOCK 200
(23B) FCC CODE 1			\$
(19C) FCC CALL SIGN/OTHER ID	(22C) PAYMENT TYPE CODE (PTC)	(23C) QUANTITY	(22C) FEE DUE FOUR (PTC) IN BLOCK 200
(23C) FCC CODE 1			\$
(19D) FCC CALL SIGN/OTHER ID	(22D) PAYMENT TYPE CODE (PTC)	(23D) QUANTITY	(22D) FEE DUE FOUR (PTC) IN BLOCK 200
(23D) FCC CODE 1			\$
(19E) FCC CALL SIGN/OTHER ID	(22E) PAYMENT TYPE CODE (PTC)	(23E) QUANTITY	(22E) FEE DUE FOUR (PTC) IN BLOCK 200
(23E) FCC CODE 1			\$

SECTION D - TAXPAYER INFORMATION

(25) PAYER TIN
9 1 0 8 3 9 4 8 0

(26) APPLICANT TIN

SECTION E - CERTIFICATION

(27) CERTIFICATION STATEMENT (PRINT NAME)
I, Holly Rachel Smith, 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 *Holly Rachel Smith*

SECTION F - CREDIT CARD PAYMENT INFORMATION

(28) MUST ENTER VISA ACCOUNT NUMBER: MASTERCARD VISA

EXPIRATION DATE: MONTH YEAR

AUTHORIZED SIGNATURE:

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

SEE PUBLIC BURDEN ESTIMATE ON REVERSE

FCC FORM 159 JULY 1997 (REVISED)

TO THE ORDER OF Federal Communications Commission

Pay Seven hundred eighty and 00/100 DOLLARS \$ 780.00

DATE 3 July 2000

2775
 15-122/540 97762
 First Union National Bank
FIRST UNION
 5-91
 DAVIS WRIGHT TREMAINE LLP
 PH. 202-508-6600
 1155 CONNECTICUT AVENUE, N.W., SUITE 700
 WASHINGTON, DC 20036

Holly Rachel Smith