

**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: _____

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

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JUL 05 2000

SUITE 500

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July 5, 2000

AFFILIATE OFFICES

BANGKOK, THAILAND

JAKARTA, INDONESIA

MANILA, THE PHILIPPINES

MUMBAI, INDIA

TOKYO, JAPAN

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

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC

Re: In the Matter of Call Home Telecom LLC's Application for Authority Under Section 214 of the Communications Act of 1934, as Amended, to Operate as a Facilities-Based Carrier and as a Resale Carrier for the Provision of International Switched and Private Line Services to All International Points

Dear Ms. Salas:

On behalf of Call Home Telecom LLC ("Call Home"), enclosed for filing with the Federal Communications Commission, please find an original and five copies of the above-referenced Application. Enclosed herein for this filing are the Form 159 Fee Remittance Sheet, a check in the amount of \$780.00 to cover the filing fee, and a duplicate copy of the filing. Please date-stamp the duplicate and return to the courier. If there are any questions regarding this filing, please contact me at (202) 887-1238. Thank you for your assistance with this matter.

Sincerely,



Winifred R. Brantl

cc: B. Blalock, International Bureau

Enclosures

DC01/BRANW/117937.1

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)	
)	
CALL HOME TELECOM LLC)	
Application for Authority Under)	
Section 214 of the Communications)	
Act of 1934, as Amended, to Operate)	Docket No. _____
as a Facilities-Based Carrier and as a)	
Resale Carrier for the Provision of)	
International Switched and Private)	
Line Services to All International Points)	

APPLICATION

Call Home Telecom LLC (“Call Home” or “Applicant”), by its attorneys and pursuant to Section 214 of the Communications Act of 1934, as amended (“the Act”), 47 U.S.C. §214, hereby requests authority to (1) operate as a facilities-based carrier pursuant to Section 63.18(e)(1) of the Commission’s Rules on all routes *except* Guyana, Haiti, and Bermuda; (2) operate as a resale carrier pursuant to Section 63.18(e)(2) of the Commission’s Rules on all routes *except* Guyana, Haiti, and Bermuda; and (3) provide facilities-based and resale services pursuant to Section 63.18(e)(4) of the Commission’s Rules to Guyana, Haiti and Bermuda.¹

¹ With respect to the provision of switched services over private lines, Call Home seeks authority in this Application to provide such services only to (1) those locations specifically approved by the Commission for the provision of such services, or (2) as specified in Section 63.22(e)(2) and 63.23(d)(2) of the Commission’s Rules, 47 C.F.R. §§ 63.22(e)(2), 63.23(d)(2), which permit the use of private lines to provide switched access services where the carrier is exchanging traffic with a foreign carrier that lacks market power at the foreign end.

With the exception of Guyana, Haiti and Bermuda, Call Home has no affiliation with any foreign carrier in any of the destination countries for which authority is requested. In Haiti and Bermuda, Call Home is affiliated with a foreign carrier, but demonstrates below that its foreign affiliates on these routes lack 50 percent market share in the international transport and local access markets on the foreign end, such that Call Home qualifies for a presumption of non-dominant treatment under Section 63.10(a)(3) of the Commission's Rules. Furthermore, Call Home is not affiliated with any dominant U.S. carrier whose services Call Home may resell. In light of these facts, Call Home should be classified as a nondominant carrier in its provision of international service on all non-affiliated routes plus Haiti and Bermuda. In Guyana, Call Home is affiliated with Guyana Telephone & Telegraph Company, Limited. Guyana is a Member of the World Trade Organization ("WTO"). Thus, grant of this authority to Call Home is appropriate under the rules and policies established by the Commission in its *Foreign Participation Order*.² Call Home will accept dominant carrier treatment on this route.

This Application is entitled to streamlined processing under Section 63.12 of the Commission's Rules. Streamlined processing is appropriate because on each route for which authority has been requested, either (1) Call Home is not affiliated with foreign carriers on the route for which authority is sought, or (2) Call Home has demonstrated that it qualifies for a presumption of non-dominant treatment under Section 63.10(a)(3) of the Commission's Rules, or (3) the affiliated destination market is a WTO member country and Call Home accepts dominant carrier treatment.

² *Rules and Policies on Foreign Participation in the U.S. Telecommunications Market*, IB Docket No. 97-142 (rel. Nov. 26, 1997) ("*Foreign Participation Order*").

Pursuant to Section 63.18 of the Commission's Rules, Call Home sets forth the following information in support of this Application:

- (a) The name, address, and telephone number of the Applicant is:

Call Home Telecom LLC
P.O. Box 12030
St. Thomas, U.S. VI 00801
(340) 777-8000

- (b) Call Home is a limited liability company organized under the laws of the United States Virgin Islands.

- (c) Correspondence concerning this Application should be sent to:

Lawrence M. Fuccella, Jr.
Chief Operating Officer
Call Home Telecom LLC
P.O. Box 12030
St. Thomas, U.S. VI 00801
(340) 777-8000

with copies to:

Robert J. Aamoth
Winafred R. Brantl
KELLEY DRYE & WARREN LLP
1200 19th Street, N.W.
Suite 500
Washington, D.C. 20036
(202) 955-9600

- (d) Call Home has never applied for nor been granted authority under Section 214.

(e) For all locations for which authority is requested in this Application except Guyana, Haiti and Bermuda, Call Home is applying for authority to operate as a facilities-based carrier pursuant to Section 63.18(e)(1) of the Commission's Rules, and as a resale carrier pursuant to Section 63.18(e)(2) of the Commission's Rules. For Guyana, Haiti and Bermuda, Call Home requests authority, pursuant to Section 63.18(e)(4) of the Commission's Rules, to provide resold services under the terms of Section 63.23 and facilities-based services under the terms of Section 63.22. As evidenced by the certification provided in Attachment A, Call Home certifies that it will comply with the terms and conditions contained in Sections 63.21, 63.22 and 63.23 of the Commission's Rules.

(f) No response required.

(g) Call Home will use previously authorized facilities to provide its facilities-based services and thus this Application is categorically excluded from environmental assessment pursuant to Section 1.1306 of the Commission's Rules.

(h) The following persons or entities directly or indirectly hold ten percent or greater interest in Call Home:

Atlantic Tele-Network, Inc.
P.O. Box 12030
St. Thomas, U.S. VI 00801
Citizenship – United States
Principal Business: Telecommunications
Ownership Percentage: 100%

The following persons or entities directly or indirectly hold ten percent or greater interest in Atlantic Tele-Network, Inc.:

Cornelius B. Prior, Jr.
P.O. Box 12030
St. Thomas, U.S. VI 00801
Citizenship – United States
Principal Business: Telecommunications
Ownership Percentage: 63.5%

There are no interlocking directorates with foreign carriers in the countries for which authority is requested.

- (j) As evidenced by the certification provided in Attachment A, Call Home is affiliated with foreign carriers in Guyana, Haiti and Bermuda.
- (j) Call Home is a wholly-owned subsidiary of Atlantic Tele-Network, Inc., which holds a controlling interest in ATN (Haiti), a foreign carrier in Haiti, and Guyana Telephone & Telegraph Company, Limited, a foreign carrier in Guyana.
- (k) Haiti and Guyana are members of the WTO.
- (l) See response to (m) below.
- (m) Call Home qualifies for a presumption of non-dominant treatment under Section 63.10(a)(3) of the Commission's Rules in its provision of service to Haiti and Bermuda because Call Home's foreign affiliates in each of these countries lack 50 percent market share in the international transport and local access markets on the foreign end of the route.

In Haiti, Call Home's parent company, Atlantic Tele-Network, owns a 80 percent interest in ATN (Haiti), which provides dispatch radio, wireless data network, and paging services in Haiti. Based on number of subscribers, ATN (Haiti)'s share of paging market in Haiti is less than 35 percent, while its share of the trunked radio market is approximately 50 percent. Accordingly, ATN (Haiti)'s share of the international transport and local access markets in Haiti is substantially less than 50 percent. Call Home notes that the Commission has recognized that Telecommunications d'Haiti S.A.M. is the dominant carrier in Haiti.

In Bermuda, Atlantic Tele-Network owns 30 percent of Bermuda Digital Communications Ltd., which operates under the name "Cellular One" and provides cellular and PCS services in competition with the Bermuda Telephone Company. Bermuda Digital Communications' share of the cellular and PCS market in Bermuda is less than 25 percent, and thus its share of the international transport and local access markets in Bermuda is substantially less than 50 percent. Call Home notes that the Commission has recognized Cable & Wireless Bermuda as the dominant carrier in Bermuda.

As noted previously, Call Home will accept dominant carrier treatment in its provision of service to Guyana.

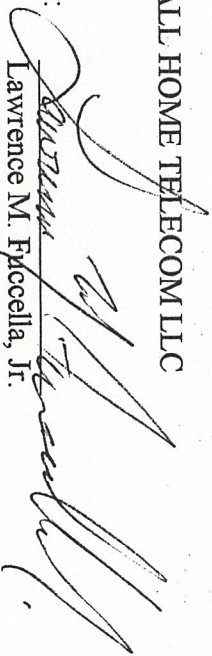
- (m) As evidenced by the certification provided in Attachment A, Call Home has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future.
- (o) As evidenced by the certification provided in Attachment A, no party to this Application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
- (p) Call Home requests streamlined processing pursuant to Section 63.12 of the Commission's Rules. This Application is eligible for streamlined processing because on each route for which authority has been requested, either (1) Call Home is not affiliated with foreign carriers on the route for which authority is sought, or (2) Call Home has demonstrated that it qualifies for a presumption of non-dominant treatment under Section 63.10(a)(3) of the Commission's Rules, or (3) the affiliated destination market is a WTO member country and Call Home accepts dominant carrier treatment. Furthermore, Call Home is not reselling the services of an affiliated dominant US carrier or requesting authority to provide switched services over private lines to countries not previously authorized for this service.

For these reasons, Call Home requests that the Commission grant this Application.

Respectfully submitted,

CALL HOME TELECOM LLC

By:



Lawrence M. Fuccella, Jr.

Chief Operating Officer

CALL HOME TELECOM LLC

P. O. Box 12030

St. Thomas, U.S. VI 00801

(340) 777-8000

Robert J. Aamoth
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Its Attorneys

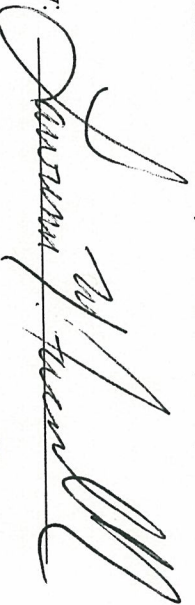
Dated: July 5, 2000

ATTACHMENT A

CERTIFICATE

The undersigned hereby certifies, on behalf of Call Home Telecom LLC ("Call Home"), with respect to the foregoing application for authority to provide international service, that:

1. Call Home is affiliated with foreign carriers that operate in Bermuda, Guyana, and Haiti.
2. Call Home will comply with the terms and conditions contained in Sections 63.21, 63.22 and 63.23 of the Commission's Rules.
3. Call Home's parent company, Atlantic Tele-Network, Inc. controls foreign carriers in the countries listed in Attachment B to the application.
4. Call Home 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 sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future.
5. No party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853(a).

By: 

Title: CHIEF OPERATING OFFICER

Date: 6/29/00

ATTACHMENT B

Call Home Telecom LLC's parent company, Atlantic Tele-Network, Inc. controls foreign carriers in the following countries:

Guyana
Haiti

READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE

APPROVED BY OMB

3060-0593

(1) LOCKBOX # 358115

PAGE NO. 1 OF 1

SPECIAL USE
FCC USE ONLY

SECTION A - PAYER INFORMATION

(10) TOTAL AMOUNT PAID (dollars and cents)

(2) PAYER NAME/IF paying by credit card, enter name exactly as it appears on your card)
Kelley Drye & Warren LLP

(4) STREET ADDRESS LINE NO. 1

1200 19th Street, N.W.

(5) STREET ADDRESS LINE NO. 2

Suite 500

(6) CITY

Washington

(7) STATE

DC

(8) ZIP CODE

20036

(9) DATETIME TELEPHONE NUMBER (include area code)

(202) 955-9600

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)
Call Home Telecom, LLC

(12) STREET ADDRESS LINE NO. 1

P.O. Box 12030

(13) STREET ADDRESS LINE NO. 2

(14) CITY
St. Thomas

(15) STATE

U.S. VI

(16) ZIP CODE

00801

(17) DATETIME TELEPHONE NUMBER (include area code)

COMPLETE SECTION C FOR EACH SERVICE; IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEETS (FORM 159-C)

SECTION C - PAYMENT INFORMATION

(18A) FCC CALL SIGN/OTHER ID

C U T

(18A) QUANTITY

\$ 780.00

FCC USE ONLY

(21A) FCC CODE 1

(20A) PAYMENT TYPE CODE (PTC)

(18B) FCC CALL SIGN/OTHER ID

(20B) PAYMENT TYPE CODE (PTC)

(18B) QUANTITY

(21B) FEE DUE FOR (PTC) IN BLOCK 21B

FCC USE ONLY

(23B) FCC CODE 1

(19C) FCC CALL SIGN/OTHER ID

(23C) PAYMENT TYPE CODE (PTC)

(19C) QUANTITY

(23C) FEE DUE FOR (PTC) IN BLOCK 20C

FCC USE ONLY

(23D) FCC CODE 1

(19D) FCC CALL SIGN/OTHER ID

(23D) PAYMENT TYPE CODE (PTC)

(19D) QUANTITY

(23D) FEE DUE FOR (PTC) IN BLOCK 20D

FCC USE ONLY

(23D) FCC CODE 1

SECTION D - TAXPAYER INFORMATION (REQUIRED)

(24) COMPLETE THIS BLOCK ONLY IF APPLICANT IS AN INDIVIDUAL (SEE INSTRUCTIONS FOR PAYEE FORM 159-C)

(25) PAYER TIN

0 1 3 5 3 3 5 1 0 7

(26) APPLICANT TIN

SECTION E - CERTIFICATION

(27) CERTIFICATION STATEMENT
I, Minafred R. Brantl, Certify under penalty of perjury that the foregoing and supporting information

(PRINT NAME)

Minafred Brantl

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

SECTION F - CREDIT CARD PAYMENT INFORMATION

(28)

MASTERCARD/VISA ACCOUNT NUMBER

EXPIRATION DATE

MASTERCARD

[Empty grid for account number]

MONTH YEAR

VISA

(I hereby authorize the FCC to charge my VISA or MASTERCARD for this service(s)/product(s).)

AUTHORIZED SIGNATURE

SEE PUBLIC BURDEN ESTIMATE ON REVERSE

KELLEY DRYE & WARREN LLP
1200 19TH STREET, N.W.
WASHINGTON, DC 20036

006206

15-122/540
BRANCH 00480

DATE June 28, 2000

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Federal Communications Commission

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IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.
KELLEY DRYE & WARREN LLP

DATE	DESCRIPTION	AMOUNT
6/28/00	Charge 003464.0001 for Section 214 application filing fees	\$780.00