

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

**RECEIVED**

ZSF International, LLC

JUL 27 2000

Application for Authority Pursuant to

Telecom Division  
International Bureau  
File No.

Section 214 of the Communications Act of )  
1934 as Amended, for Global Authority to )  
Provide International Communications )  
Services )

**APPLICATION FOR AUTHORITY**

ZSF International, LLC ("ZSF"), hereby requests authority, pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. Section 214 (1982), and Section 63.12 of the Commission's Rules, 47 C.F.R. Section 63.12, for global authority to provide facilities based international switched communications services, including international basic switched, private line, data, television and business services and to resell the international services of other common carriers for the provision of such services.

ZSF's provision of international service will not have any significant impact on the general provision of such service to the public. Additional competition in the market - including the competition ZSF will provide - benefits consumers of international telecommunications services. The benefits of competition include lower prices and increased availability of a variety of service options. ZSF submits therefore, that grant of this application will serve the public interest convenience and necessity and requests that it be processed pursuant to the streamlined procedures applicable to non-dominant carriers. See §63.12 of the Commission's Rules, 47 C.F.R. §63.12. Pursuant to §63.18 of the Commission Rules, 47 C.F.R. §63.18, ZSF submits the following in support of its request for authorization.

- (a) Name and address:
- ZSF International, LLC  
17505 West Catawba Avenue  
Suite 150  
Cornelius, NC 28031
- (b) ZSF is incorporated under the laws of the state of North Carolina.
- (c) Correspondence concerning this application should be sent to:
- Mr. Charles See  
ZSF International, LLC  
17505 West Catawba Avenue  
Suite 150  
Cornelius, NC 28031

with copies to:

- Howard J. Barr, Esq.  
Pepper & Corazzini, L.L.P.  
1776 K Street, N.W., Suite 200  
Washington, D.C. 20006  
202/296-0600
- (d) ZSF has not previously received authority under §214 and will be a non-dominant carrier subject to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. §214 (1982) as a result of the proposed international operations.
- (e) ZSF is requesting Section 214 authority to operate as a facilities-based carrier pursuant to the terms and conditions of §63.18(e)(1) and to operate as a resale carrier pursuant to 63.18(e)(2) of the Commission's Rules, 47 C.F.R. §63.18(e)(1) and (2).
- (f) ZSF certifies that it will comply with the terms and conditions contained in §§63.21, 63.22 and 63.23 as adopted in 1998 Biennial Regulatory Review - Review of International Common Carrier Authorizations, FCC 99-51, released March 23, 1999, 64 Fed. Reg. 19057-15067, April 19, 1999.
- (g) The public interest, convenience and necessity will be served by the grant of this application. Grant of this application will bring to the marketplace a variety of alternative

competitive international telecommunications services. Consumers of telecommunications services will benefit from the increased price competition and the increased availability of services.

(h) ZSF certifies that it has no affiliation with any foreign carrier. ZSF further certifies that it has no affiliation with any U.S. carriers whose facilities-based international service(s) it proposes to resell.

(i) ZSF certifies that it has not agreed 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 ZSF may serve under the authority requested herein and that it will not enter into such agreements in the future.

(j) ZSF's 10% or greater shareholders are:

Name/Address	%	Citizenship	Principal Business
T.H. Zhang 17505 West Catawba Avenue Suite 150 Cornelius, NC 28031	60	P.R. China	Telecommunications
Charles A. See 17505 West Catawba Avenue Suite 150 Cornelius, NC 28031	40	USA	Telecommunications

### CONCLUSION

As demonstrated in this application, ZSF International, LLC is legally, financially and technically qualified to provide the services for which it requests authority. For



reasons stated above, ZSF submits that the public interest, convenience and necessity would be furthered by a grant of this Section 214 application.

Respectfully submitted,

ZSF INTERNATIONAL, LLC

By:   
Charles See

Of Counsel:

Howard J. Barr  
Pepper & Corazzini, L.L.P.  
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Suite 200  
Washington, D.C. 20006  
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