

**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: _____

PAUL, WEISS, RIFKIND, WHARTON & GARRISON
1615 L STREET, NW
WASHINGTON, DC 20036-5694
TELEPHONE (202) 223-7300
FACSIMILE (202) 223-7420

1285 AVENUE OF THE AMERICAS
NEW YORK, NY 10019-6064
TELEPHONE (212) 373-3000
FACSIMILE (212) 757-3990

WRITER'S DIRECT DIAL NUMBER

62, RUE DU FAUBOURG SAINT-HONORE
75008 PARIS, FRANCE
TELEPHONE (33 1) 53 43 14 14
FACSIMILE (33 1) 53 43 00 23

(202) 223-7337

WRITER'S DIRECT E-MAIL ADDRESS

kmerski@paulweiss.com

FUKOKU SEIMEI BUILDING
2-2, UCHISAWAICHO 2-CHOME
CHIYODA-KU, TOKYO 100-0011, JAPAN
TELEPHONE (81-3) 3597-8101
FACSIMILE (81-3) 3597-8120

2918 CHINA WORLD TOWER II
NO. 1 JIANGUOMENWAI DAJIE
BEIJING, 100004
PEOPLE'S REPUBLIC OF CHINA
TELEPHONE (86-10) 6505-6822
FACSIMILE (86-10) 6505-6830

July 31, 2000

12TH FLOOR, HONG KONG CLUB BUILDING
3A CHATER ROAD, CENTRAL
HONG KONG
TELEPHONE (852) 2536-9333
FACSIMILE (852) 2536-9622

VIA CAPITAL FILING SPECIALISTS

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Federal Communications Commission
International Bureau - Telecommunications
P.O. Box 358115
Pittsburgh, PA 15251-5115

Telecom Division
International Bureau

AUG 03 2000

Re: StarHub Pte Ltd
Application for Section 214 Authorization
to Serve All Authorized Locations Except Singapore

Dear Sirs:

On behalf of StarHub Pte Ltd, please find enclosed an original and five copies of the above-captioned application. We have also attached the requisite FCC Form 159 and an application filing fee of \$780.

Please date-stamp the extra copy of this application and return it in the enclosed self-addressed, stamped envelope. Any questions regarding the enclosed application should be addressed to the undersigned.

Respectfully submitted,



Kira A. Merski
Attorney for StarHub Pte Ltd

Enclosures

than five percent. As explained below, while StarHub, as a new entrant, does not have the ability to exercise market power in Singapore, under Commission rules it appears that StarHub could be considered affiliated with Singapore Telecommunications Limited (“SingTel”), the primary provider of domestic and international telecommunications services in Singapore. Because it could be considered affiliated with a dominant carrier in Singapore, StarHub is not requesting section 214 authority on the U.S.-Singapore route in this Application. Because StarHub is not a foreign carrier in a destination market and is not affiliated with a foreign carrier in a destination market, StarHub hereby requests that the Commission process this Application in accordance with its streamlined processing procedures.

In accordance with Section 63.18 of the Rules, the Company submits the following information in support of its application:

- (a) The applicant is StarHub Pte Ltd. The address of the Company’s principal place of business is: 51 Cuppage Road #07-00, StarHub Centre, Singapore 229469. The phone number at that address is +65 825 5000.
- (b) StarHub is organized under the laws of the Republic of Singapore.
- (c) Correspondence concerning this Application should be directed to:

John Poston
Senior Vice President, International & Wholesale
51 Cuppage Road #07-00
StarHub Centre
StarHub Pte Ltd
Singapore 229469
Tel: +65 825 5708
Fax: +65 721 5008
E-mail: johnmp@starhub.com.sg

With copies to:

Kelvin Tan
Legal Counsel
51 Cuppage Road #07-00
StarHub Centre
Singapore 229469
Tel: +65 825 5145
Fax: +65 721 5004
E-mail: kelvint@starhub.com.sg

and

Phillip L. Spector, Esq.
Laura B. Sherman, Esq.
Kira A. Merski, Esq.
Paul, Weiss, Rifkind, Wharton & Garrison
1615 L Street, N.W., Suite 1300
Washington, D.C. 20036
Tel: (202) 223-7300
Fax: (202) 223-7340

(d) StarHub has not received authority previously under Section 214 of the Act.

(e) StarHub hereby requests global Section 214 authority to (i) operate as a facilities-based international carrier between the United States and all permissible points except Singapore, pursuant to the terms and conditions of Section 63.18(e)(1) of the Rules, as well as any and all other provisions of the Rules applicable hereto, and (ii) to resell international services, between the United States and all permissible points except Singapore pursuant to the terms and conditions of Section 63.18(e)(2) of the Rules, as well as any and all other provisions of the Rules applicable hereto. The authorization sought in this application will be used to provide a full range of telecommunications services, including switched voice and data and private line services, between the United States and all permissible foreign points.

- (f) Not applicable.
- (g) Not applicable.
- (h) The 10% or greater direct or indirect equity owners of StarHub are

as follows:

- (1) STT Communications Pte Ltd (“STT”)
51 Cuppage Road #10-11/17
StarHub Centre
Singapore 229469
Singapore incorporated company
Principal business: info-communications and multi-media business in Singapore and the region and the provision and management of info-communications services and investment activities.
9% direct ownership of the company (additional indirect as described below).

Which is 100% owned by:

ST Telemedia Pte Ltd
51 Cuppage Road
#10-11/17
StarHub Centre
Singapore 229469
Principal Business: holding company

Singapore Technologies Pte Ltd
51 Cuppage Road
#09-01
StarHub Centre
Singapore 229469
Principal Business: Engineering, technology, infrastructure & lifestyle, property and financial services

Which is majority owned by:

Temasek Holdings (Private) Limited (“Temasek”)
8 Shenton Way #38-03
Temasek Tower
Singapore 068811
Principal business: holding company

- (2) Techpower Communications Pte Ltd
 111 Somerset Road #16-01
 Singapore 238164
 Singapore incorporated company
 Principal business: holding company
 51% direct equity interest in the Company
- Which is 50% owned by:
- STT
- And 50% owned by:
- Singapore Power Limited (“SP”)
 111 Somerset Road
 PUB Building
 Singapore 238164
 Principal business: provision of utilities
- SP is majority-owned by:
- Temasek
- (3) NTT Investment Singapore Pte Ltd
 20 Cecil Street #11-03/06
 The Exchange
 Singapore 049705
 Singapore incorporated company
 Principal business: to provide telecommunications services
 and systems integration services.
 22% direct equity interest in the Company
- Which is 100% owned by:
- NTT Communications Corporation
 Kowa Nishi-shinbashi Bldg., B, 14-1 Nishi-shinbashi
 2-chome Minato-ku, Tokyo 105-0003
 Japan
 Principal business: domestic and international
 telecommunications services
- (4) BT (Netherlands) Holding B.V.
 Overschiestat 65
 1062 XD Amsterdam
 Netherlands
 Netherlands incorporated company

Principal business: to participate in, to be otherwise interested in, to finance and to manage other business enterprises of any nature whatsoever.
18% direct equity interest in the Company

Which is 100% owned by:

BT Sixty-Four Limited
81 Newgate Street
London EC1A 7AJ
Registered in England
Principal business: holding company

Which is 100% owned by:

BT Fifty-Three Limited
81 Newgate Street
London EC1A 7AJ
Registered in England
Principal business: holding company

Which is 66.6% held by:

BT (International) Holdings Ltd.
81 Newgate Street
London EC1A 7AJ
Registered in England
Principal business: holding company

Which is 100% owned by:

BT Holdings Limited
81 Newgate Street
London EC1A 7AJ
Registered in England
Principal business: holding company

Which is 100% owned by:

British Telecommunications plc
81 Newgate Street
London EC1A 7AJ
Registered in England
Principal business: domestic and international
telecommunications services

(i) StarHub hereby certifies, under penalty of perjury, that StarHub is a foreign carrier in Singapore, and is not a foreign carrier in any other country. Both StarHub and SingTel are majority owned by Temasek, an investment holding company with diverse interests in a wide spectrum of industries including media, financial services, transportation, ship repair and engineering, repair and leisure recreation. Temasek is wholly-owned by the Minister of Finance (Incorporated) in Singapore, and hence, under the Rules, StarHub could be considered affiliated with SingTel. StarHub has no interlocking directorates with foreign carriers.

(j) StarHub hereby certifies, under penalty of perjury, that it does not seek to provide international telecommunications services to any destination country for which any of the provisions of Section 63.18(j) are true.

(k) Not applicable.

(l) Not applicable.

(m) StarHub is not a foreign carrier and is not affiliated with a foreign carrier for any destination country. Thus, it should be classified as a non-dominant carrier for destination countries covered by this Application.

(n) StarHub hereby certifies, under penalty of perjury, that it has not agreed to accept -- nor will it 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 that StarHub may serve under the authority granted pursuant to Part 47 of the Rules.

(o) Pursuant to Sections 1.2001 through 1.2003 of the Rules, by certification attached hereto, StartHub certifies that no party to this application is subject to a denial of Federal benefits that includes FCC benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

(p) Under Section 63.12 of the Rules, this application is subject to the Commission's streamlined processing rules because no provision of Section 63.12(c) is applicable. StartHub is not, and is not affiliated with, a foreign carrier in any destination country.

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

StarHub Pte Ltd

File No. I-T-C-____-

Application pursuant to Section 214 of the
Communications Act of 1934, as amended,
for global authority to acquire and operate
U.S. common carrier and non-common carrier
facilities for the provision of international
common carrier service between the
United States and all permissible foreign points
except Singapore and to provide such service
via resale.

CERTIFICATION OF APPLICANT

I hereby certify, under penalty of perjury, that neither the applicant nor
any party to this application is subject to a denial of Federal benefits that includes FCC
benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section
853a. Executed on this 31st day of July, 2000.

StarHub Pte Ltd

By: *Kira A. Merski*

Phillip L. Spector²
Laura B. Sherman
Kira A. Merski
Paul, Weiss, Rikkind, Wharton & Garrison
1615 L Street, N.W., Suite 1300
Washington, D.C. 20036
Tel: (202) 223-7300
Fax: (202) 223-7340

Its Attorneys

² Pursuant to Section 1.743(b) of the Commission's Rules, this Application is signed by
StarHub's counsel on StarHub's behalf as all StarHub representatives that are
authorized to sign the Application are absent from the United States.