

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

AUG 03 2000
Telecom Division
International Bureau

Re: StarHub Pte Ltd
Application for Section 214 Authorization
to Serve the U.S.- Singapore Route _____

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

Kira A. Merski
Attorney for StarHub Pte Ltd

Enclosures

**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 Singapore and to provide
such service via resale.

APPLICATION

StarHub Pte Ltd ("StarHub" or the "Company"), hereby applies for
authority, pursuant to Section 214 of the Communications Act of 1934, as amended (the
"Act"), and Section 63.18 of the Commission's Rules and Regulations (the "Rules"), to
(1) construct, acquire and/or operate U.S. common carrier and non-common carrier
facilities previously and subsequently authorized by the Commission to provide
telecommunications services between the United States and Singapore, (2) resell the
international services of authorized U.S. common carriers between the United States and
Singapore, and (3) provide international simple resale ("ISR") between the United States
and all ISR-approved countries, including Singapore.

StarHub is a Singapore company that provides fixed and mobile domestic
and international telecommunications services in Singapore. It is the new entrant in
Singapore's recently liberalized telecommunications market, with a market share of less
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 will accept (without prejudice to its right to petition for reclassification at a later date) dominant carrier status on the U.S.-Singapore route. Thus, because StarHub will accept dominant carrier status on the U.S.-Singapore route and because Singapore is a WTO Member, 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: johnp@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 Singapore, pursuant to the terms and conditions of Section 63.18(e)(1) and Section 63.18(e)(4) of the Rules, as well as any and all other provisions of the Rules applicable hereto, (ii) to resell international services, between the United States and Singapore pursuant to the terms and conditions of Section 63.18(e)(2) and Section 63.18(e)(4) of the Rules, as well as any and all other provisions of the Rules applicable hereto, and (iii) to provide ISR between the United States and all ISR-approved countries, including Singapore. 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 Singapore.

- (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.

Overschiestaat 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. 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 (1) it seeks to provide international telecommunications services to Singapore, (2) it is a foreign carrier in Singapore, and (3) an entity that owns more than 50 percent of SingTel indirectly owns more than 25 percent of StarHub. StarHub does not seek to provide international telecommunications services to any other destination country for which any of the provisions of Section 63.18(f) are true.

(k) Singapore is a Member of the World Trade Organization.

(l) StarHub seeks authority to resell the international switched services of unaffiliated U.S. carriers for the purpose of providing international telecommunications services to Singapore. StarHub will file the quarterly traffic reports required by Section 43.61(c).

(m) StarHub seeks to operate as a U.S. facilities-based and resale international carrier between the United States and Singapore, the only destination

country in which StarHub is, or is affiliated with, a foreign carrier. StarHub hereby agrees to be classified as a dominant carrier on that route.

(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, StarHub 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 StarHub is agreeing to be classified as dominant on the U.S.-Singapore route, and Singapore is a member of the World Trade Organization.

As demonstrated herein, StarHub is legally and technically qualified to provide the services for which it requests authority. The grant of this application will serve the public interest by promoting increased competition in the international telecommunications marketplace.

Respectfully submitted,

StarHub Pte Ltd

By: Kira A. Merski

Phillip L. Spector¹

Laura B. Sherman

Kira A. Merski

Paul, Weiss, Rifkind, Wharton & Garrison
1615 L Street, N.W., Suite 1300
Washington, D.C. 20036

Its Attorneys

Date: July 31, 2000

¹ 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.

Washington, D.C. 20554

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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:

Phillip L. Spector²

Laura B. Sherman

Kira A. Merski

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1615 L Street, N.W., Suite 1300

Washington, D.C. 20036

Tel: (202) 223-7300

Fax: (202) 223-7340

Its Attorneys

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.