

**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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**I. SECTION 63.18 INFORMATION**

Pursuant to Section 63.18 of the Commission's Rules, 47 CFR § 63.18, Witley provides the following information:

- (a) Applicant's name, address, and telephone number:

Witley Holdings, LLC  
PO Box 211718  
Royal Palm Beach, FL 33480  
(561)-333-7650

- (b) Witley is a Delaware limited liability company.

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

Martin Brown  
Witley Holdings, LLC  
PO Box 211718  
Royal Palm Beach, FL 33480  
(561)-333-7650

with a copy addressed to:

Teresa D. Baer  
William S. Carnell  
Latham & Watkins  
1001 Pennsylvania Avenue, N.W.  
Suite 1300  
Washington, DC 20004  
(202) 637-2200

- (d) Witley has not previously applied for or received authority under Section 214 of the Act.

- (e) (i) Witley is applying for facilities-based authority to provide international telecommunications services pursuant to § 63.18(e)(1) of the Commission's Rules.

- (ii) Global authority is sought.

(iii) Witley certifies that it will comply with the terms and conditions contained in §§ 63.21 and 63.22 of the Commission's Rules.

(h) The name, address, citizenship and principal businesses of the direct or indirect holders of at least 10% of the equity of the applicant are as follows:

| <b>Name and Address</b>   | <b>Citizenship</b> | <b>Principal Business</b> | <b>Percentage</b> |
|---|--------------------|---------------------------|-------------------|
| Witley Communications Ltd.<br>Witley Farm, Haslemere Road,<br>Brook<br>Godalming Surrey, GU8 5LD<br>England | UK                 | Telecommunications        | 100%              |

Witley Communications is wholly owned by:

| <b>Name and Address</b>   | <b>Citizenship</b> | <b>Principal Business</b>   | <b>Percentage</b> |
|---|--------------------|-----------------------------|-------------------|
| Martin Brown<br>Witley Communications Ltd.<br>Witley Farm, Haslemere Road,<br>Brook<br>Godalming Surrey, GU8 5LD<br>England | UK                 | Agriculture,<br>investments | 100%              |

Martin Brown, a member of Witley, is also a director of Witley Communications.

- (j) Witley certifies that it is wholly owned by Witley Communications, a foreign carrier in the UK.
- (i) Witley certifies that it seeks to provide international telecommunications to a destination country (the UK), where an entity that controls it (Witley Communications) is a foreign carrier in that country.
- (k) The UK is a member of the World Trade Organization.
- (m) Although Witley is wholly owned by Witley Communications, it is presumptively entitled to be regulated as non-dominant under § 63.10(a)(3) of the Commission's Rules because Witley Communications holds less than a 50 percent share of

the international transport and local access markets on the foreign end of the US-UK route.

(n) Witley certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any US international route where the foreign carrier possesses market power on the foreign end of the route and will not enter into such agreements in the future.

(o) Witley certifies, pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules, that no party to the 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. § 853a.

(p) This Application qualifies for streamlined processing pursuant to § 63.12(c)(1)(ii) because it is entitled to a presumption of non-dominance under § 63.10(a)(3).

## II. **GRANT OF THIS APPLICATION WILL SERVE THE PUBLIC INTEREST, CONVENIENCE AND NECESSITY**

Prompt grant of this Application will greatly serve the public interest in the efficient and competitive provision of international telecommunications services to the public. Authorizing Witley to provide global facilities-based services will provide US business with greater choices for their international telecommunications needs, and will foster the goals of the WTO Agreement.

The Commission should therefore streamline the processing of this application and grant the requested authorization.

**III. CONCLUSION**

For the foregoing reasons, the Commission should grant a facilities-based international Section 214 authorization to Witley Holdings, LLC, under the Commission's streamlined processing procedures.

Respectfully submitted,

**WITLEY HOLDINGS, LLC**

By:   
Martin Brown  
Director

July 25, 2000