

NOWALSKY, BRONSTON & GOTHARD

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Streamlined
EDUCATION COMMUNICATION SYSTEMS, INC.
ITC-214-20001016-00618

October 13, 2000

RECEIVED

FCC/MELLON

OCT 16 2000

OCT 19 2000

Telecom Division
International Bureau
RECEIVED

Federal Communications Commission
Three Mellon Bank Center
525 William Penn Way
27th Floor, Room 153-2713
Pittsburg, Pennsylvania 15259-0001

OCT 19 2000

Telecom Division
International Bureau

RE: Education Communication Systems, Inc.

Dear Sir or Madam:

Enclosed please find an original and five (5) copies of the Application for authority pursuant to Section 214 of the Communications Act of 1934, as amended, to operate as an international resale carrier. Also, enclosed is FCC Form 159 and the requisite \$815.00 filing fee.

Please acknowledge receipt of this filing by date stamping and returning the additional copy of this cover letter in the stamped self-addressed envelope provided.

Thank you for your cooperation and assistance in this matter. If you should require any additional information, please do not hesitate to call.

Sincerely,


Leon L. Nowalsky

LLN/sw
Enclosures

cc: FCC Secretary
415 12th Street, S.W.
Washington, D.C. 20554

READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE

APPROVED BY OMB

3060-0589

(1) LOCKBOX #

PAGE NO. _____ OF _____

SPECIAL USE
FCC USE ONLY

SECTION A - PAYER INFORMATION

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card)
Nowalsky, Bronston & Gothard, APPLICANT

(3) TOTAL AMOUNT PAID (dollars and cents)
\$ 815.00

(4) STREET ADDRESS LINE NO. 1
3500 North Causeway Blvd.

(5) STREET ADDRESS LINE NO. 2
Suite 1442

(6) CITY
Metairie

(7) STATE
LA

(8) ZIP CODE
70002

(9) DAYTIME TELEPHONE NUMBER (include area code)
(504) 832-1984

(10) COUNTRY CODE (if not in U.S.A.)

**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)
Education Communication Systems, Inc.

(12) STREET ADDRESS LINE NO. 1
7300 Pearl Street

(13) STREET ADDRESS LINE NO. 2
Suite 225

(14) CITY
Bethesda

(15) STATE
Maryland

(16) ZIP CODE
20814

(17) DAYTIME TELEPHONE NUMBER (include area code)
(800) 669-4303

(18) COUNTRY CODE (if not in U.S.A.)

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

SECTION C - PAYMENT INFORMATION

(19A) FCC CALL SIGN/OTHER ID
C U T

(20A) PAYMENT TYPE CODE (PTC)

(21A) QUANTITY
1

(22A) FEE DUE FOR (PTC) IN BLOCK 20A
\$ 815.00

FCC USE ONLY

(23A) FCC CODE 1

(20B) PAYMENT TYPE CODE (PTC)

(21B) QUANTITY

(22B) FEE DUE FOR (PTC) IN BLOCK 20B
\$

FCC USE ONLY

(23B) FCC CODE 1

(20C) PAYMENT TYPE CODE (PTC)

(21C) QUANTITY

(22C) FEE DUE FOR (PTC) IN BLOCK 20C
\$

FCC USE ONLY

(23C) FCC CODE 1

(20D) PAYMENT TYPE CODE (PTC)

(21D) QUANTITY

(22D) FEE DUE FOR (PTC) IN BLOCK 20D
\$

FCC USE ONLY

(23D) FCC CODE 1

(20E) PAYMENT TYPE CODE (PTC)

(21E) QUANTITY

(22E) FEE DUE FOR (PTC) IN BLOCK 20E
\$

FCC USE ONLY

SECTION D - TAXPAYER INFORMATION (REQUIRED)

(25) PAYER TIN
7 2 - 1 2 5 8 0 5 2

(26) APPLICANT TIN

SECTION E - CERTIFICATION

(27) CERTIFICATION STATEMENT
I, Sherree West (PRINT NAME), Certify under penalty of perjury that the foregoing and supporting information are true and correct to the best of my knowledge, information and belief. SIGNATURE Sherree West

SECTION F - CREDIT CARD PAYMENT INFORMATION

(28) MASTERCARD

MASTERCARD/VISA ACCOUNT NUMBER

AUTHORIZED SIGNATURE

EXPIRATION DATE
MONTH YEAR

VISA

I hereby authorize the FCC to charge my VISA or MASTERCARD for the service(s) described herein.

SEE PUBLIC BURDEN ESTIMATE ON REVERSE

FCC FORM 159 JULY 1997 (REVISED)

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Telecom Division
International Bureau

services between the United States and all international points served by those carriers; (3) global authority pursuant to Section 63.18(e)(2)(A) to resell international private lines to provide international private line services between the United States and all international points, other than those requiring special authority because of their listing on the most recent exclusion list; and (4) global authority pursuant to Section 63.18(e)(2)(B) to resell international private lines interconnected to the public switched telephone network at one or both ends to provide international switched services between the United States and all countries found to offer equivalent resale opportunities to U.S. carriers.

ECS is hereby requesting: (a) facilities-based authority to obtain interests in U.S. authorized facilities, and connecting facilities not appearing on the Exclusion List; (b) authority to resell international private lines to provide international switched services between the United States and countries designated by the Commission as offering equivalent resale opportunities; and (c) authority to resell international private lines to countries not appearing on the Exclusion List.

ECS will report its acquisition of interest(s) in facilities, including earth stations, channels of communication to satellites, and submarine cables in its circuit addition/circuit status report files under Section 43.82 of the Commissions Rules, 47 C.F.R. Section 43.82. ECS will also report its resale of international private lines in its traffic reports filed pursuant to Section 43.61 of the Commission's Rules.

By granting this application, the Commission will serve the public interest, convenience and necessity by promoting competition in the international services market. Competition will benefit U.S. consumers by increasing service options and lowering prices. Thus, the public interest will be served by the grant of Section 214 authority to ECS.

II. The Applicant:

ECS is a business corporation organized and existing under the laws of the State of Maryland. ECS is privately held, and no ECS officer or director is an employee, agent or representative of a foreign telecommunications entity. Further, ECS has no foreign affiliations as defined in Part 63 of the Commission's Rules.

ECS has not previously received authority under Section 214 to provide any telecommunications services or operate any facilities which provide such services. Upon the grant of this Application, ECS will become an authorized non-dominant facilities-based carrier and international reseller subject to Section 214 of the Communications Act, as amended, and the Commission's Rules.

III. Public Interest Considerations:

The Commission's publicly stated policy goals for regulation of the United States international telecommunications market is to promote effective competition in the United States telecommunications market, including the market for international services, to prevent anti-competitive conduct in the provision of international services or facilities and to encourage foreign governments to open their communications markets. The Commission has also moved to establish an effective global communications market that could result in reduced rates, increased quality and new services. The Commission has found that effective competition directly advances the public interests and the Commission's paramount goal of making available a rapid, efficient worldwide wire and radio communications service with adequate facilities at reasonable charges.

The grant of ECS's request for resale and facilities-based authority as described herein will further the Commission's policies of facilitating increased competition within the United States international telecommunications services market, and is therefore in the public interest.

IV. Information Required Under Section 63.18:

The following information is submitted, as required by Section 63.18 of the Commission's Rules, in support of ECS's request for authorization:

- (a) Name and address of Applicant:
Education Communication Systems, Inc.
7300 Pearl Street
Suite 225
Bethesda, Maryland 20814
Telephone: (800) 669-4303
- (b) Applicant is a business corporation which was organized under the laws of the State of Maryland.
- (c) Correspondence concerning this application should be sent to:
Leon L. Nowalsky
Nowalsky, Bronston & Gothard
A Professional Limited Liability Company
3500 N. Causeway Boulevard
Suite 1442
Metairie, Louisiana 70002
Telephone: (504) 832-1984
- (d) ECS has not received authority previously under Section 214 of the Communications Act.
- (e) ECS requests: (1) global facilities-based authority pursuant to Section 63.18(e)(1) to acquire ownership interests in unaffiliated, U.S. licensed facilities, including but not limited to full and partial circuits in submarine

transmission cables and channels of communication with U.S. owned satellite systems, to provide international telecommunications services between the United States and all international points; (2) global authority pursuant to Section 63.18(e)(2) to resell international switched services of all authorized common carriers, except carriers regulated as dominant on the route to be served, to provide international switched services between the United States and all international points; (3) global authority pursuant to Section 63.18(e)(2)(A) to resell international private line services between the United States and all international points; and (4) global authority pursuant to Section 63.18(e)(2)(B) to resell international private lines for the provision of international switched services between the United States and all countries that the Commission finds offer equivalent competitive opportunities to U.S. carriers.

(f) At this time, ECS seeks no other authorization available under Section 63.18(e).

(g) Not applicable.

(h) ECS certifies that it is not affiliated, either directly or indirectly, with any foreign or U.S. facilities-based carrier whose services it proposes to resell. Should the substance of this certification cease to be accurate, ECS shall notify the Commission immediately of any such affiliation.

(i) In support of this certification, the name, address, citizenship and principal business of the ten percent or greater shareholders of ECS are as follows:

<u>Name</u>	<u>% Held</u>	<u>Citizenship</u>	<u>Principal Business</u>
James Nicholson 7300 Pearl Street Suite 225 Bethesda, Maryland 20814	33.8%	USA	Telecommunications
Celeste Beaupre 7300 Pearl Street Suite 225 Bethesda, Maryland 20814	31.8%	USA	Telecommunications
Anita Woodbury 7300 Pearl Street Suite 225 Bethesda, Maryland 20814	18.9%	USA	Telecommunications

(j) ECS certifies that it has not agreed and will not agree in the future to accept any direct or indirect special concessions from a foreign carrier or administration with regards to traffic or revenue flows between the United states and any foreign countries the Company is authorized to serve.

(k) ECS certifies that no party to this Application has been denied federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

Conclusion:


In conclusion, ECS certifies that all of the information in this application is accurate and correct.

WHEREFORE, for the reasons stated, ECS respectfully requests that the Commission grant this Application.

Respectfully submitted,

Education Communication Systems, Inc.

By: 
Name: Celeste Beaupre
Title: COO


Leon L. Nowalsky
Nowalsky, Bronston & Gothard
A Professional Limited Liability Company
3500 N. Causeway Boulevard
Suite 1442
Metairie, Louisiana 70002
Telephone: (504) 832-1984,
Counsel for Applicant