

# MILLER ISAR

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**Streamlined**  
QVH, INC.

**ITC-214-20001113-00671**

*Via Overnight Delivery*  
November 9, 2000

STACEY A. KLINZMAN

Ms. Magalie R. Salas, Esq., Secretary  
Federal Communications Commission  
445 12th Street S. W., Room TWD 204  
Washington, D.C. 20554

RE: QVH, Inc. – Section 214 Application

Dear Ms. Salas:

Enclosed are an original and five (5) copies of QVH, Inc.'s Application for Global Facilities-Based Authority, Switched Service Resale and Private-Line Resale Authority ("Application"), filed pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. Section 214, and Section 63.18 of the Rules of the Federal Communications Commission ("FCC"), 47 C.F.R. Section 63.18.

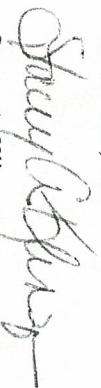
Also enclosed is a completed Fee Processing Form, FCC Form 159, and check made payable to the FCC in the amount of \$815.00 to cover the cost of filing this Application. This filing has been delivered via overnight delivery to the Federal Communications Commission c/o the Mellon Bank, Three Mellon Bank Center, 525 William Penn Way, 27<sup>th</sup> Floor, Room 153-2713, Pittsburgh, PA 15259-0001, Attention: Wholesale Lockbox Shift Supervisor. A separate copy of the Application for the International Bureau is enclosed.

Please acknowledge receipt of this filing by file-stamping the additional copy of this letter and returning it in the self-addressed postage paid envelope provided for this purpose.

Questions regarding this filing may be directed to me.

Sincerely,

**Miller Isar, Inc.**



Stacey A. Klinzman  
Senior Regulatory Consultant

Enclosures

cc: Chief, International Facilities Division  
International Bureau- Telecommunications  
Mr. Harut Paldzyan, President, QVH, Inc.

FCC/ML... NOV 13 2000

RECEIVED

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.  
NOV 16 2000  
Telecom Division  
International Bureau

In the Matter of

QVH, Inc.

Application Pursuant to Section 214 of the ) File No. \_\_\_\_\_  
 Communications Act of 1934, as amended, for )  
 Global Authority to Acquire and Operate )  
 Facilities of Authorized U.S. Carriers and to )  
 Resell Switched and Private-line Services of )  
 Authorized U.S. Carriers for the Provision of )  
 International Service to all Permissible )  
 International Points )

APPLICATION FOR SECTION 214 CERTIFICATION

QVH, Inc. ("Applicant" or "QVH"), pursuant to Section 214 of the Communications Act of 1934, as amended, ("the Act"), 47 U.S.C. § 214 and § 63.18 *et seq.* of the rules and regulations of the Federal Communications Commission ("Commission"), hereby requests authority to acquire and/or operate facilities of other U.S. common carriers and non-common carriers previously and subsequently authorized by the Commission, including any necessary foreign connecting facilities, for the purpose of providing telecommunications services between the United States and all foreign points permitted by the Commission. Applicant further requests authority to resell the international switched services and private-line services of authorized U.S. common carriers for the provision of international service to all permissible international points deemed by the Commission to afford equivalent resale opportunities to U.S. carriers. Applicant will operate the facilities it acquires and resells only in accordance with the Commission's rules and regulations applicable thereto, particularly §§ 63.18(e)(1) and (2).

Pursuant to § 63.18 of the Commission's rules, 47 C.F.R. § 63.18, Applicant submits the following information in support of its Application for authority:

1. § 63.18(a). The name, address, telephone number and facsimile number of the Applicant are:

QVH, Inc.  
13727 Hart Street  
Van Nuys, California 91405

Telephone: (818) 259-9747  
Facsimile: (818) 786-5908

2. § 63.18(b). The Applicant was organized under the laws of the State of California on March 22, 1999.

3. § 63.18(c). Correspondence concerning this Application should be addressed to:

Ms. Stacey A. Klinzman  
Miller Isar, Inc.  
3220 Uddenberg Lane, Suite 4  
Gig Harbor, Washington 98335

Telephone: (253) 851-6700  
Facsimile: (253) 851-6474

and

Mr. Harut Paldzyan  
President  
QVH, Inc.  
13727 Hart Street  
Van Nuys, California 91405

Telephone: (818) 259-9747  
Facsimile: (818) 786-5908

4. § 63.18(d). The Applicant has not previously received authority under Section 214 of the Act.
5. § 63.18(e)(1) through (5). Applicant requests authority to operate as a facilities-based international carrier, pursuant to Section 214 of the Act and the Commission's Foreign Carrier Entry Order<sup>1</sup>. The Applicant would acquire and operate international facilities for the provision of international switched service to those countries found by the Commission to provide equivalent opportunities to obtain facilities. It will operate those facilities in accordance with the terms and conditions of §§ 63.18(e)(1) and 63.21 of the Commission's rules, as well as any other applicable rules and regulations of the Commission.  
Applicant further requests authority pursuant to Section 214 of the Act to resell the international switched and private-line services of authorized U.S. common carriers for the provision of international switched and basic private-line services to all permissible international points deemed by the Commission to afford equivalent resale opportunities to U.S. carriers.
6. § 63.18(f) and (k). This Application is subject to the Commission's streamlined processing rules. The Applicant is a non-dominant carrier which qualifies for non-dominant regulation pursuant to 47 C.F.R. § 63.12, as it is not affiliated with a foreign carrier within the meaning of § 63.18(h)(1)(i) in a destination market for its facilities-based or resold services as set forth below. Furthermore, Applicant is not affiliated with

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<sup>1</sup> In the Matter of Market Entry and Regulation of Foreign-Affiliated Entities ("Report and Order"), IB Docket No. 95-22, FCC 95-475, 11 FCC Rcd. 3873 (1995).



any U.S. carriers whose facilities-based services it proposes to resell.

7. § 63.18(g). Not applicable.

8. § 63.18(h)(1) and (3). By its executed certification attached hereto, Applicant certifies that it has no affiliation with foreign carriers, as defined in §§ 63.18(h)(1)(i) and (ii) of the Commission's Rules nor any affiliation with any U.S. carriers whose facilities-based services it proposes to resell.

9. § 63.18(h)(2). Applicant's ownership is as follows:

Name: Harut Paldzyan  
Address: 13727 Hart Street  
Van Nuys, California 91405

Ownership: 71 percent  
(a United States citizen)

Name: Berj Peter Harutyunyan  
Address: 6618 Mammoth Avenue  
Van Nuys, California 91405

Ownership: 14.5 percent  
(a United States citizen)

Name: Gregor Gezalyan  
Address: 7868 Varna Avenue  
Van Nuys, California 91402

Ownership: 14.5 percent  
(a United States citizen)

10. § 63.18(i). By its executed certification attached hereto, Applicant certifies that it has not accepted, 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 Applicant may serve under the authority granted pursuant to this Application.
11. § 63.18(j). Pursuant to 47 C.F.R. §§ 1.2001 through 1.2003, by its executed certification attached hereto, Applicant certifies that no party to the Application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act on 1988, 21 U.S.C. § 853a.
12. Applicant will comply with the accuracy requirements of this section if authorized to provide international communications service.
13. As demonstrated herein, Applicant is legally and technically qualified to provide the services for which it requests authority. For the reasons stated above, Applicant submits that the public interest, convenience and necessity would be furthered by a grant of this Section 214 Application.

WHEREFORE, QVH, Inc. respectfully requests that the Commission issue the requested Section 214 authorization for the purpose of providing global facilities-based telecommunications services and resold international switched and private-line services of authorized U.S. common carriers for the provision of international service to all permissible international points deemed by the Commission to afford equivalent resale opportunities to U.S. carriers.

Respectfully submitted, this 7<sup>th</sup> day of November, 2000.

QVH, Inc.

By: 

Mr. Harut Paldzyan  
President  
QVH, Inc.  
13727 Hart Street  
Van Nuys, California 91405

Telephone: (818) 259-9747  
Facsimile: (818) 786-5908

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3220 Uddenberg Lane, Suite 4  
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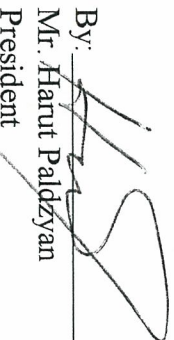
Applicant's Regulatory Consultants

CERTIFICATION OF APPLICANT

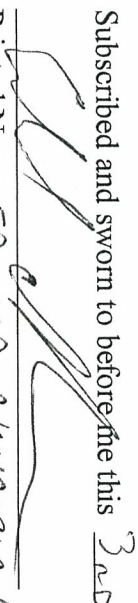
I hereby certify that the statements in the foregoing Application for Section 214 authority are true, complete and correct to the best of my knowledge, information and belief and are made in good faith. I hereby certify that QVH, Inc. ("QVH") is not affiliated with any foreign carrier and is not affiliated with any facilities-based carrier whose services QVH intends to resell. I hereby certify that QVH will not 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 QVH may serve under the authority granted under this part. I also hereby certify that no party to the foregoing Application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act on 1988, 21 U.S.C. § 853a.

Dated this 3<sup>rd</sup> day of November, 2000.

QVH, Inc.

By:   
Mr. Harut Paldzyan  
President  
QVH, Inc.  
13727 Hart Street  
Van Nuys, California 91405

Subscribed and sworn to before me this 3<sup>rd</sup> day of NOVEMBER, 2000.

  
Printed Name: EDWARD AKHPARIAN  
Notary Public in and for the State of California  
Residing at 13743 VICTORY BL, #R. 4.A. CA. 91401  
My commission expires: MAY 03 2001

