

November 9, 2000

VIA OVERNIGHT MAIL

Federal Communications Commission

International Bureau

Telecommunications Division

P. O. Box 358115

Pittsburgh, PA. 15251-5115

FCC/MELTON

NOV 14 2000

RECEIVED

Attention: Diane Cornell
International Bureau

NOV 17 2000

Telecom Division
International Bureau


Re: Authority of NYLF Inc. (NYLF) for
Section 214 International Global Facilities-Based
Authority and Global Resale Authority

Dear Sir or Madam:

Enclosed for filing with the Commission are the original and six (6) copies of the application of NYLF Inc. (NYLF) for authority pursuant to Section 214 of the Communications Act. NYLF is requesting 1) global facilities-based authority to acquire interests in unaffiliated, U.S. owned circuits and half-circuits in authorized facilities to provide international telecommunications services between the United States and all international points; 2) global authority to resell international, switched services of all unaffiliated carriers to provide international switched services between the United States and all international points served by those carriers; 3) global authority to resell international private lines to provide international, private line services between the United States and all international points; and 4) authority to resell international private lines interconnected to the public switched telephone network ("PSTN") at one or both ends to provide international, switched services between the United States and all countries found to offer equivalent resell opportunities to U.S. carriers.

As required by the Commission's Rules, enclosed is a cashier's Check in the amount of \$815.00, payable to the F.C.C. Please stamp-date the extra copy of this application and return it in the self-addressed, stamped envelope. Any questions regarding the enclosed application should be addressed to the undersigned.

Respectfully submitted,


Dewey Newman
Chief Operating Officer

Enclosures

RECEIVED

NOV 17 2000

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

Telecom Division
International Bureau

In the matter of	}
NYLF Inc.(NYLF)	}
	} File No. I-T-C-00 _____
	}
Application for authority pursuant to	}
Section 214 of the Communications Act	}
of 1934, as amended, for global authority	}
to operate as a facilities-based carrier and	}
as an international resell carrier	}
	}

NYLF, by its undersigned Chief Operating Officer (COO), hereby requests global authority, under Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. & 214 (1996), and Section 63.18 of the Commission's Rules, C.F.R. & 63.18 (1996), to provide international telecommunications services between the United States and various international points.

I. The Proposed International Services

NYLF requests four types of authority in this application, all of which are eligible for streamlined processing. NYLF specifically requests (1) global facilities-based authority pursuant to Section 63.18 (e) (1), to acquire ownership interests in unaffiliated, U.S. licensed facilities to provide international telecommunications services between the United States and all international points; (2) authority pursuant to Section 63.18 (e) (2) of the FCC's Rules, 47 C.F.R. & 63.18 (e)(2), to resell international, switched services of all authorized carriers to provide international switched services between the United States and all international points served by those carriers; (3) global authority pursuant to Section 63.18 (e)(2)(a) of the FCC's Rules, 47 C.F.R. 7 63.18 (e)(2)(B), 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 mostly recent exclusion list; and (4) authority pursuant to Section 63.18 (e)(2)(B) of the FCC's Rules, 47 C.F.R. & 63.18 (e)(2)(B), to resell international, private lines interconnected to the public switched telephone network ("PSTN") at one or both ends to provide international switched services between the United States and all countries found to offer equivalent resell opportunities to U.S. carriers.

READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE

Approved by OMB
3000-0399
Page No. 1 of 1
MED

(1) LOCKBOX #

SPECIAL USE
FCC USE ONLY
NOV 17 2000

SECTION A - PAYER INFORMATION

TELECOM DIVISION

(3) TOTAL AMOUNT PAID (U.S. Dollars and Cents) Bureau

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card)
DeWey K. Melwinalin

\$181.51

(4) STREET ADDRESS LINE NO. 1
11689 Melwinalin Ct.

(5) STREET ADDRESS LINE NO. 2

(6) CITY
Pleasanton

(7) STATE
VA

(9) DAYTIME TELEPHONE NUMBER (include area code)
703-264-1363

(8) ZIP CODE
20191

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

FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED

(11) PAYER (FRN)
763860560000

(12) PAYER (TIN)
413464672

IF PAYER NAME AND THE APPLICANT NAME ARE DIFFERENT, COMPLETE SECTION B
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C)

(13) APPLICANT NAME
M L F Erickhange

(14) STREET ADDRESS LINE NO. 1
11689 Melwinalin Ct.

(15) STREET ADDRESS LINE NO. 2

(16) CITY
Pleasanton

(17) STATE
VA

(19) DAYTIME TELEPHONE NUMBER (include area code)
703-264-1560

(18) ZIP CODE
20191

FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED

(21) APPLICANT (FRN)

(22) APPLICANT (TIN)
413464672

COMPLETE SECTION C FOR EACH SERVICE. IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET

(23A) CALL SIGN/OTHER ID

(24A) PAYMENT TYPE CODE
CW7

(25A) QUANTITY
10/1

(26A) FEE DUE FOR (PTC)
\$181.51

(27A) TOTAL FEE
\$181.51

FCC USE ONLY

(28A) FCC CODE 1

(29A) FCC CODE 2

(23B) CALL SIGN/OTHER ID

(24B) PAYMENT TYPE CODE

(25B) QUANTITY

(26B) FEE DUE FOR (PTC)

(27B) TOTAL FEE

FCC USE ONLY

(28B) FCC CODE 1

(29B) FCC CODE 2

SECTION D - CERTIFICATION

(30) CERTIFICATION STATEMENT
I, DeWey K. Melwinalin, certify, under penalty of perjury that the foregoing and supporting information is true and correct to the best of my knowledge, information and belief.
SIGNATURE DeWey K. Melwinalin DATE 11/9/00

SECTION E - CREDIT CARD PAYMENT INFORMATION

(31)

MASTERCARD

MASTERCARD/VISA ACCOUNT NUMBER:

EXPIRATION

VISA

I hereby authorize the FCC to charge my VISA or MASTERCARD for the service(s)/authorization herein described.
SIGNATURE _____ DATE _____

SEE PUBLIC BURDEN ON REVERSE

FCC FORM 159

FEBRUARY 2000 (REVISED)

NYLF will report its acquisition of interest 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 Commission's Rules 47 C.F.R. & 43.82. NYLF will also report its resell of international, switched services and international private lines to provide international private line and switched services in its traffic reports filed pursuant to Section 43.61 of the Commission's Rules.

NYLF believes that the added competition which its expanded market entry will bring to the market will benefit the consumers of the United States overseas services. These benefits include competitive pricing and increased availability of a variety of service options. A grant of this application will therefore, further the public interest.

II. The Applicant

NYLF is a corporation organized and existing under the laws of Delaware and based in the Commonwealth of Virginia. NYLF is a privately held corporation and no NYLF officer is an employee, agent, or representative of another foreign telecommunications entity. Further, NYLF is not affiliated with any other foreign carriers as defined by Part 63 of the Commission's Rules.

NYLF is a new entrant in the telecommunications industry which has not previously received authority under Section 214 to provide any telecommunications services or operate any facilities which provide such services. NYLF serves international and domestic carriers in the United States as well as retail customers in the U. S. and in other countries. Upon the grant of this application, NYLF will become an authorized non-dominant facilities-based carrier 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 the regulation of the United States international telecommunications market to promote effective competition in the communications market, including the market for international telecommunications services, to prevent anti-competitive conduct in the provision for international services or facilities and to encourage foreign governments to open their communication markets.

The Commission also has moved to establish an effective global communications market that could result in reduced rates, increased quality and new services. In addition, 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 NYLF's request for resale and facilities-based authority to provide international services will further the Commission's policies of facilitating increased competition within the U.S. international telecommunications services market and is therefore in the public interest.

IV. Information Required Under Section 63.18

As required under Section 63.18 of the Commission's Rules, NYLF submits the following information:

- (a) Name and Address of Applicant:
New York-London-Frankfurt Exchange Inc.
11689 Newbridge Ct.
Reston, VA 20191
- (b) NYLF is a corporation organized under the laws of the State of Delaware
- (c) Address questions concerning this application to:
Dewey L. Newman
11689 Newbridge Court
Reston, VA. 20191
(703) 264- 1363
- (d) NYLF is a new entrant in the telecommunications industry. It has never received authority pursuant to Section 214 of the Communications Act of 1934, as amended, and under the Commission's Rules. NYLF lacks market power that would allow control of prices to the detriment of market competition.
- (e) NYLF requests Section 214 authority to: (1) operate as a facilities-based carrier pursuant to terms and conditions of Section 63.18 (e)(1); and (2) operate as a resale carrier pursuant to the terms and conditions of Section 63.18 (e)(2). Specifically, NYLF seeks to (1) acquire capacity in full and half-circuits in submarine cables, and establish channels of communication with U.S. owned satellite systems, to provide international telecommunications services between the U.S. and all international points; (2) resell the international services of all authorized common carriers, except affiliated carriers regulated as dominant on the route to be served to provide

international telecommunications services between the U.S. and all international points; (3) resell international private lines to provide international private line services between U.S. and all international points; and (4) resell international private lines for the provision of international switched services between the U.S. and all countries that the Commission finds provide U.S. carriers with effective competitive opportunities.

(f) NYLF does not seek authority to provide services which are not referenced under paragraph (e) of Section 63.18 of the Commission's Rules.

(g) The authority requested in this application is categorically excluded from environmental processing as defined by Section 1.306 of the Commission's Rules, 47 C.F.R. & 1.306, obviating the need for an environmental assessment.

(h) NYLF certifies that it is not affiliated, either directly or indirectly, with any foreign carrier (as that part is defined in Part 63 of the Commission's Rules) or with any U.S. carriers whose facilities-based services it proposes to resell. Should the substance of the certification cease to be true, NYLF shall notify the Commission immediately of any affiliation with any foreign carrier or any U.S. carriers whose services NYLF seeks to resell.

(i) Individuals holding 10% or greater ownership or management interest in the corporation follow:


<u>Name</u>	<u>Business Address</u>	<u>%</u>	<u>Citizen</u>	<u>Occupation</u>
Lisa Brantly	11689 Newbridge Ct. Reston, Virginia 20191	100	British	Telecommunications Executive

As required by Section 63.18 (1) of the Commission's Rules, 47 C.F.R. & 63.18 (1), NYLF certifies that it has not agree to accept not shall it accept in the future special concessions as defined by the Commission's Rules, directly or indirectly from any foreign carrier or administration with respect to traffic or revenue flows between the U.S. and any foreign country for which NYLF may be authorized to serve.

CONCLUSION

NYLF is legally, financially, and technically qualified to provide the services for which it requests authority. For the reasons stated above, NYLF affirms that the public interest, convenience, and necessity would be furthered by a grant of this Section 214 application. NYlf certifies that all the information in this application is accurate and correct.

Respectfully submitted :

By: 
Dewey L. Newman, COO
NYLF Inc.
11689 Newbridge Ct.
Reston, Virginia 20191
703-860-5600

Date 11/9/00

ANTI-DRUG ABUSE CERTIFICATION

Applicant certifies that, to the best of its knowledge, information, and belief, neither applicant nor any party to this application is subject to a denial of federal benefits or licenses under Section 5301 of the Anti-Drug Abuse Act of 1988.

Respectfully submitted,

By: 
Dewey L. Newman, COO, NYLF Inc.

Date 11/9/00