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November 21, 2000

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NOV 27 2000

Telecom Division
International Bureau

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Correction to Section 214 Application

Dear Ms. Salas:

Attached please find an original and five copies of a corrected version of an application for section 214 authority, which was filed yesterday on behalf of Verizon Long Distance ("VLD"). This erratum is necessary because VLD's description of its affiliate NYNEX Gibraltar Ltd. ("NYNEX Gibraltar") at page 13 of the application stated that NYNEX Gibraltar provided domestic wireline service in Gibraltar, but did not mention that NYNEX Gibraltar is authorized to provide international service between Gibraltar and Spain. In addition, we have corrected the name of the Bell Atlantic subsidiary that holds an interest in FLAG.

Please do not hesitate to contact the undersigned should you have any questions.

Sincerely,



John F. Papandrea

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NOV 27 2000

Before the

FEDERAL COMMUNICATIONS COMMISSION

NOV 21 2000

Telecom Division
International Bureau

Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

BELL ATLANTIC COMMUNICATIONS, INC.
D/B/A VERIZON LONG DISTANCE

Non-Streamlined TTC-214-20001121-00680
BELL ATLANTIC COMMUNICATIONS INC.
VERIZON LONG DISTANCE

Application for Authority Pursuant to
Section 214 of the Communications Act of 1934,
as Amended, For Authority to Operate as an
International Facilities-Based and Resale
Carrier

APPLICATION FOR SECTION 214 AUTHORITY

Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance (“VLD”)¹ hereby requests authority, pursuant to section 214 of the Communications Act of 1934, as amended (the “Act”), 47 U.S.C. § 214, and sections 63.18(e)(1) and 63.18(e)(2) of the Commission’s rules, 47 C.F.R. § 63.18(e)(1) and 63.18(e)(2), to provide international facilities-based and resale services between all points in Massachusetts and international points. Specifically, this application requests authority for VLD:

- (1) to provide global international facilities-based service between all points in Massachusetts and all international points, except Gibraltar and countries listed on the Commission’s exclusion list;²

¹ VLD’s affiliates, NYNEX Long Distance Company, d/b/a Verizon Enterprise Solutions (“VES”), Verizon Select Services Inc. (“VSSI”), and Verizon Global Services Inc. (“VGS”) are filing separate applications for similar authority.

² Compania Anonima Nacional Telefonos de Venezuela (“CANTV”), a carrier in Venezuela, is affiliated with VLD’s parent company Verizon Communications Inc. (formerly known as Bell Atlantic Corporation) as that term is defined in section 63.09(e) of the

(2) to resell international services of all authorized U.S. carriers between all points in Massachusetts and all international points.

The requested authority is similar to that granted to Bell Atlantic Communications, Inc. (“BACI”) and NYNEX Long Distance Company (“NYNEX-LD”) contemporaneously with approval of Bell Atlantic’s section 271 application for New York.

Pursuant to section 63.10 of the Commission’s rules, 47 C.F.R. § 63.10, VLD is entitled to non-dominant treatment for all of the above services, except for facilities-based and resale services to or from Venezuela and the Dominican Republic and resale services to or from Gibraltar. On routes to or from Gibraltar, the Dominican Republic, and Venezuela, VLD certifies that it will comply with the Commission’s dominant carrier regulations. VLD also is entitled to non-dominant treatment on the U.S.-Gibraltar, U.S.-Dominican Republic, and U.S.-Venezuela routes to the extent that it serves those routes by reselling the international switched services of unaffiliated U.S. facilities-based carriers.³

This application is integrally related to the pending application of VLD to provide in-region, interLATA services in Massachusetts, pursuant to section 271 of the Act, 47 C.F.R.

§ 271.⁴ That application was filed on September 22, 2000 and must be acted upon by December

Commission’s rules, 47 C.F.R. § 63.09(e). The current settlement rates that CANTV charges U.S. international carriers to terminate traffic in Venezuela are not below the Commission’s relevant benchmarks adopted in IB Docket No. 96-261, but will meet the benchmark on January 1, 2001. Accordingly, VLD requests that the present request automatically extend to facilities-based service between the United States and Venezuela once CANTV’s settlement rates meet the relevant benchmark.

³ 47 C.F.R. § 63.10(a)(4).

⁴ *Application by Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance (d/b/a Verizon Enterprise Solutions), and*

21, 2000. In order not to delay VLD's ability to offer customers in Massachusetts a full complement of interLATA services, VLD must obtain authority to provide the requested international services no later than the date of approval of its pending section 271 application for Massachusetts.⁵ Accordingly, VLD requests prompt action on the instant application.

Description of Applicant

VLD is an indirect, wholly-owned subsidiary of Verizon Communications Inc. (formerly known as Bell Atlantic Corporation) ("Verizon") and is a corporation organized under the laws of the State of Delaware. VLD is currently authorized to provide resold and facilities-based international telecommunications services originating in the State of New York⁶ and in out-of-region states.⁷

Verizon Global Networks Inc., for Authorization to Provide In-Region, InterLATA Services in Massachusetts, CC Docket No. 00-176 (filed Sept. 22, 2000).

⁵ Issues relating to whether Verizon should receive interLATA authority are not relevant to this application, but will be considered in proceedings dealing with section 271 applications filed by Verizon's local operating companies.

⁶ *Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York*, 1999 FCC LEXIS 6564 (rel. Dec. 22, 1999) ("*New York 214 Order*").

⁷ Verizon's "in-region" states are the states formerly served by Bell Atlantic's local operating telephone companies. These states are Maine, New Hampshire, Vermont, Massachusetts, Connecticut, Rhode Island, New York, New Jersey, Pennsylvania, Delaware, Maryland, the District of Columbia, Virginia, and West Virginia. *See* 47 U.S.C. § 271(1); *see also Bell Atlantic Communications, Inc. Application for Global Authority to Provide Facilities-based Switched, Private Line, and Data Services between the United States and International Points*, 12 FCC Rcd 1880 (1997) ("*Facilities Order*"); *NYNEX Long Distance Company Application for Authority to Provide International Services from Certain Points within the United States to Gibraltar through the Resale of International Switched Services*, Order, Authorization and Certificate, File No. I-T-C-96-447, DA 97-504, (rel. Mar. 12, 1997) ("*NYNEX Gibraltar Order*"); *NYNEX Long Distance Company Application for Authority to Provide International Services from Certain Parts of the United States to International Points through the Resale of International Switched Services*, 11 FCC Rcd 8685 (1996) ("*Resale Order*").

Verizon, VLD's parent company, has ownership interests in several foreign carriers, as the term "foreign carrier" is defined in section 63.09(d) of the Commission's rules, 47 C.F.R. § 63.09(d). Through some of these interests, VLD is "affiliated" with foreign carriers within the meaning of section 63.09(e) of the Commission's rules, 47 C.F.R. § 63.09(e). These entities are described fully in the response to section 63.18(i) below.

Eligibility for Non-Dominant Treatment

VLD is entitled to non-dominant treatment for all facilities-based authority applied for herein, except U.S.-Venezuela and U.S.-Dominican Republic routes. VLD agrees to accept regulation as a dominant carrier on the routes between the United States and Venezuela and the Dominican Republic, and is not seeking to serve Gibraltar on a facilities basis.⁸

In addition, VLD plainly qualifies as a non-dominant carrier for resale authority to or from all countries except Gibraltar, the Dominican Republic, and Venezuela. VLD requests authority to resell international services of all authorized U.S. carriers, between all points in Massachusetts and all international points, except those countries on the Commission's exclusion list. The Commission already has classified VLD as non-dominant in the provision of international services originating in the State of New York as well as in out-of-region states on all routes except U.S.-Dominican Republic, U.S. - Gibraltar, and U.S.-Venezuela. This reflects the fact that the agency has classified BOC interLATA affiliates as non-dominant in the provision of in-region, international services.⁹ Accordingly, VLD should be classified as a non-dominant reseller for its services on all routes except U.S.-Gibraltar, U.S.-Dominican Republic, and U.S.-Venezuela.¹⁰

⁸ 47 C.F.R. § 63.10(e).

⁹ *Regulatory Treatment of LEC Provision of Interexchange Services Originating in the LEC's Local Exchange Area and Policy and Rules Concerning the Interstate, Interexchange*

Public Interest

Grant of this application will serve the public interest, convenience, and necessity by enabling VLD to offer to customers in Massachusetts international switched, private line, business, data, and all other authorized services, along with domestic interstate and intrastate long distance services, in competition with incumbent long distance carriers. The entry of VLD into the Massachusetts international services market will benefit consumers in that state by increasing competition, lowering prices, expanding available service options, and promoting more efficient use of existing international facilities.

The instant application requests section 214 authority similar to that granted to Bell Atlantic Communications, Inc. ("BACF") and NYNEX Long Distance Company ("NYNEX-LD") contemporaneously with approval of Bell Atlantic's section 271 application for New York. The Commission found those requests to be in the public interest and granted section 214 authority.¹¹ Given the similarity of these filings to the instant application, the same result is plainly warranted here.

Because this application is a companion to a separate application filed by VLD pursuant to section 271 of the Act, 47 U.S.C. § 271, the Commission has additional cause to find that this application is in the public interest. In order not to delay VLD's ability to offer customers in

Marketplace, 7 Comm. Reg. (P&F) 768 (1997). The Commission withheld non-dominant classification from BOC interLATA affiliates that are affiliated with foreign carriers, as defined in Commission rules, that have the ability to discriminate against competitors through control of bottleneck facilities or services in foreign destination markets.

¹⁰ VLD notes that it is not subject to dominant carrier obligations on the U.S.-Gibraltar, U.S.-Dominican Republic, and U.S.-Venezuela routes to the extent that it serves those routes by reselling the international switched services of unaffiliated U.S. facilities-based carriers. 47 C.F.R. § 63.10(a)(4).

Massachusetts a full complement of interLATA services, VLD must obtain authority to provide the requested international services no later than the date of approval of its pending section 271 application. Any other outcome would deny consumers the full benefits of competition set forth above, and thus would clearly *not* serve the public interest.

Section 63.18 Information

In support of this application, VLD submits the following information in accordance with section 63.18 of the Commission's rules:

- (a) The name, address and telephone number of the applicant is:
Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance
1320 N. Courthouse Road
2nd Floor
Arlington, VA 22201
(703) 526-3356

- (b) VLD is incorporated under the laws of the State of Delaware.

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

John D. Broten
Regulatory Director - Tariffs and Regulatory Matters
Verizon Long Distance
1320 N. Courthouse Road, 9th Floor
Arlington, VA 22201
Telephone: (703) 526-3044
Facsimile: (703) 526-3624

with copies to:

Micki Chen
General Counsel
Verizon Long Distance
1320 N. Courthouse Road
8th Floor
Arlington, VA 22201
Telephone: (703) 974-6694

¹¹ See *New York 214 Order* at ¶ 2.

Facsimile: (703) 974-0691

Nancy J. Victory
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, DC 20006
Telephone: (202) 719-7388
Facsimile: (202) 719-7049

(d) VLD is authorized as a non-dominant carrier to resell basic international switched services originating from the State of New York and all out-of-region states to all international points.¹² In addition, VLD is authorized as a non-dominant carrier to provide facilities-based international switched, private line, and data services from the State of New York and all out-of-region states to all international points except Gibraltar, and countries listed on the Commission's exclusion list.¹³

(e) Pursuant to the terms and conditions of section 63.18(e)(1) and 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(1) and 63.18(e)(2), VLD requests authority:

- (1) to provide global international facilities-based service between all points in Massachusetts and all international points, except Gibraltar and countries listed on the Commission's exclusion list;¹⁴ and

¹² In the Order approving the Bell Atlantic/GTE merger, the Commission imposed dominant carrier regulation of VLD on the U.S.-Gibraltar, U.S.-Dominican Republic, and U.S.-Venezuela routes. *Application of GTE CORPORATION, Transferor, and BELL ATLANTIC CORPORATION, Transferee For Consent to Transfer Control of Domestic and International Sections 214 and 310 Authorizations and Application to Transfer Control of a Submarine Cable Landing License*, FCC 00-221 (June 16, 2000), CC Docket No. 98-184 ("Merger Order").

¹³ *Resale Order, Facilities Order, NYNEX Gibraltar Order*. In the Order approving the Bell Atlantic/GTE merger, the Commission imposed dominant carrier regulation of VLD on the U.S.-Gibraltar, U.S.-Dominican Republic, and U.S.-Venezuela routes. *Merger Order*. at ¶¶ 12.

¹⁴ VLD requests authority to offer switched services over private lines to and from those markets for which the Commission has already approved or later approves such services. In

- (2) to resell international services of all authorized U.S. carriers between all points in Massachusetts and all international points, except those countries on the Commission's exclusion list.

VLD certifies that it will comply with the terms and conditions contained in section 63.21, 63.22, and 63.23 of the Commission's rules, 47 U.S.C. § 63.21, 63.22, and 63.23.

- (f) Not applicable.
(g) Not applicable.

(h) VLD certifies that it is an indirect, wholly-owned subsidiary of Verizon Communications Inc. (formerly known as Bell Atlantic Corporation) ("Verizon"), a Delaware corporation with offices at 1095 Avenue of the Americas, New York, New York 10036. Verizon's principal business is the provision of telecommunications services to the public. No single shareholder holds more than 10 percent of Verizon's equity.

VLD also certifies that it has no directors in common with any foreign carrier.

(i) VLD is affiliated, as that term is defined in section 63.09 of the Commission's rules, 47 C.F.R. § 63.09, with the following foreign carriers:

- (1) Iusacell: Verizon also indirectly owns approximately 37% of Grupo Iusacell, S.A. de C.V., which, through subsidiaries, provides domestic cellular telecommunications and international telecommunications services in Mexico ("Iusacell"). Iusacell itself owns no international facilities and holds a small share

in addition, as stated above, because the current settlement rates that CANTV charges U.S. international carriers to terminate traffic in Venezuela are not below the Commission's relevant benchmarks adopted in IB Docket No. 96-261, VLD requests that the present request automatically extend to facilities-based service between the United States and Venezuela as of January 1, 2001, when CANTV's settlement rates meet the relevant benchmark.

of the international switched services resale market in Mexico. Its domestic cellular facilities and international services are offered in addition to the existing facilities and services of other providers. The Commission already has ruled that Iusacell does not control bottleneck services or facilities and that, therefore, Iusacell lacks the ability to discriminate against unaffiliated U.S. carriers terminating traffic in Mexico.¹⁵

- (2) TELUUS Corporation, Quebec Telephone, and Clearnet Communications Inc. Through its subsidiary GTE, Verizon owns 26.7 % of TELUS Corporation (“TELUUS”), which provides telecommunications services within its certificated territory in the Provinces of Alberta and British Columbia, and 48.85% of Quebec Telephone (“Quebec Tel”) which provides telecommunications service within its certificated territory in the Province of Quebec. The agency already has found that GTE is non-dominant on the U.S.-Canada route.¹⁶

TELUUS recently acquired a 98% stake in Clearnet Communications Inc. (“Clearnet”), a nationwide cellular operator in Canada. Because Clearnet only controls mobile facilities in Canada, it lacks the ability to discriminate against unaffiliated U.S. carriers terminating traffic in Canada. Thus, VLD should continue to be regulated as non-dominant on the U.S.-Canada route.¹⁷

¹⁵ *Facilities Order*, 12 FCC Rcd at 1889.

¹⁶ See, e.g., *Merger Order* at ¶ 418; *Petition of GTE Hawaiian Telephone Company, Inc. for Reclassification as a Non-dominant IMTS Carrier*, 11 FCC Rcd 20354, ¶ 63 (1996).

¹⁷ *Cf.* 47 C.F.R. § 63.12(c)(1)(iii).

- (3) CODETEL: Through GTE, Verizon owns 100% of the Compania Dominicana de Telefonos (“CODETEL”), which provides domestic and international telecommunications services in the Dominican Republic. The current rates CODETEL charges U.S. international carriers to terminate traffic are at or below the Commission’s relevant benchmark adopted in IB Docket No. 96-261. However, the Commission has classified CODETEL as dominant on the U.S.-Dominican Republic route.¹⁸ Therefore, with respect to facilities-based and resale service, VLD agrees to be regulated as dominant on the U.S.-Dominican Republic route. However, VLD is entitled to be regulated as a non-dominant carrier on this route to the extent that it resells the international switched services of unaffiliated U.S. facilities-based carriers. 47 C.F.R. § 63.10(a)(4).

- (4) CANTV: Through GTE, Verizon owns 28.04% of Compania Anonima Nacional Telefonos de Venezuela (“CANTV”) which provides domestic and international telecommunications services in Venezuela. The current settlement rates CANTV charges U.S. international carriers to terminate traffic are not below the Commission’s relevant benchmark adopted in IB Docket No. 96-261, but will meet the benchmark on January 1, 2001. The Commission has classified CANTV

¹⁸ In a previously-granted application, Bell Atlantic Global Network & Transport Solutions, Inc. (“GNTS”), now known as Verizon Global Solutions, Inc., requested global authority to provide facilities-based and resale services originating in New York and in out-of-region states and terminating at all international points. In that application, GNTS agreed to be regulated as a dominant carrier on the U.S.-Dominican Republic, U.S.-Gibraltar, and U.S.-Venezuela routes. However, to the extent VLD provides service on these routes through resale of international switched services of unaffiliated U.S. facilities-based carriers, it qualifies for non-dominant treatment. See *International Authorizations Granted*, Aug. 24, 2000 (ITC-214-20000720-00450); *Resale Order*.

as dominant on the U.S.-Venezuela route. Therefore, with respect to facilities-based and resale service, VLD agrees to be regulated as dominant on the U.S.-Venezuela route. However, VLD is entitled to be regulated as a non-dominant carrier on this route to the extent that it resells the international switched services of unaffiliated U.S. facilities-based carriers. 47 C.F.R. § 63.10(a)(4).

- (5) CTI: Through GTE, Verizon owns 58.95% of CTI Compania de Telefonos del Interior S.A. and CTI Norte Compania de Telefonos del Interior S.A. (collectively “CTI”) which provide mobile telecommunications services in Argentina. Because CTI controls only mobile wireless facilities in Argentina, it lacks the ability to discriminate against unaffiliated U.S. carriers terminating traffic in Argentina.

Thus, VLD should continue to be classified as non-dominant on the U.S.-Argentina route.¹⁹

- (6) FLAG Telecom Holdings Limited: Through its subsidiary, Bell Atlantic Network Systems Company, Verizon holds a 29.41% interest in FLAG Telecom Holdings Limited (“FLAG”). FLAG has licenses and authorizations in numerous countries, such as:

(i) France: A FLAG subsidiary, FLAG Atlantic France (“FAF”), holds an infrastructure license (L 33.1) that authorizes it to install and operate a network in six regions of France (Bretagne, Basse Normandie, Haute Normandie, Ile de France, Nord-Pas de Calais, and Picardie). FAF has a trivial market share in France and competes directly with France Telecom, which the Commission has

¹⁹ Cf. 47 C.F.R. § 63.12(c)(1)(iii).

classified as a dominant carrier in France. Thus, VLD lacks the ability to discriminate against unaffiliated U.S. carriers terminating traffic in France and should, therefore, be regulated as non-dominant on the U.S.-France route.

(ii) Italy: FLAG's subsidiary, FLAG Telecom Ireland Limited ("FTIL"), has a resale authorization in Italy. FTIL controls no facilities, has a tiny market share, and competes with Telecom Italia, which the Commission has previously classified as a dominant carrier in Italy. Thus, VLD lacks the ability to discriminate against unaffiliated U.S. carriers terminating traffic in Italy and should, therefore, be regulated as non-dominant on the U.S.-Italy route.

(iii) Japan: FLAG holds a Type I (infrastructure and service) license in Japan. FLAG is one of many Type I licensees, and its market share in Japan is extremely small. Moreover, it controls no bottleneck facilities and it competes directly with Kokusai Denshin Denwa Co., Ltd. ("KDD") and Nippon Telegraph & Telephone Corporation ("NTT"), both of which the Commission classifies as dominant carriers. Thus, VLD lacks the ability to discriminate against unaffiliated U.S. carriers terminating traffic in Japan and should, therefore, be regulated as non-dominant on the U.S.-Japan route.

(iv) Netherlands: FTIL holds a reseller license in the Netherlands. However, FTIL's market share in the Netherlands is tiny, and the company controls no facilities. Moreover, it competes directly with KPN Telecom NV, an entity the Commission has previously classified as a dominant carrier in the Netherlands. Thus, VLD lacks the ability to discriminate against unaffiliated U.S. carriers

terminating traffic in the Netherlands and should, therefore, be regulated as non-dominant on the U.S.-Netherlands route.

(v) Singapore: A FLAG subsidiary, FLAG Telecom Singapore (“FTS”), holds a facilities-based operator license in Singapore. However, because FTS has an extremely small market share and competes directly with Singapore Telecom, VLD lacks the ability to discriminate against unaffiliated U.S. carriers terminating traffic in Singapore and should, therefore, be regulated as non-dominant on the U.S.-Singapore route.

(vi) United Kingdom: FTTL holds a public telecommunications operator (infrastructure and service) license in the United Kingdom. However, because FTTL has an extremely small market share in the UK and competes directly with British Telecom, VLD lacks the ability to discriminate against unaffiliated U.S. carriers terminating traffic in the United Kingdom and should, therefore, be regulated as non-dominant on the U.S.-UK route.

(7) GTEFFE: Through Verizon Hawaii Inc. (“VHI”), Verizon is affiliated with GTE Far East (Services) Limited (“GTEFFE”), a wholly-owned subsidiary of VHI. GTEFFE is one of the hundreds of entities that have Special Type II licenses in Japan. GTEFFE has a tiny market share in Japan and competes with KDD and NTT, both of which the Commission classifies as dominant carriers. The Commission has determined that GTEFFE lacks market power in Japan.²⁰ Therefore, VLD plainly lacks the ability to discriminate against unaffiliated U.S.

²⁰ *Merger Order* at ¶ 421.

carriers terminating traffic in Japan and should, therefore, be regulated as non-dominant on the U.S.-Japan route.

- (8) Gibraltar NYNEX Communications Ltd. (“Gibraltar NYNEX”): VLD is affiliated with Gibraltar NYNEX, a Verizon subsidiary that is authorized to provide domestic wireline communications in Gibraltar and international services between Gibraltar and Spain. The Commission previously determined that Gibraltar NYNEX was a dominant carrier in Gibraltar.²¹ VLD does not seek to serve Gibraltar on a facilities basis.

(j) VLD certifies that:

- (1) it does not seek to provide international telecommunications services to any destination country in which VLD is a foreign carrier or controls a foreign carrier;
- (2) no foreign carriers own more than 25 percent of VLD;
- (3) it seeks to serve certain destination countries in which Verizon, VLD’s parent corporation, controls foreign carriers. These foreign carriers and destination countries are: Iusacell (Mexico); TELUS, Quebec Tel, and Clearnet (Canada); CODETEL (Dominican Republic); CANTV (Venezuela); CTI (Argentina); FLAG (France, Italy, Japan, Netherlands, Singapore, and the United Kingdom); GTEFFE (Japan); and Gibraltar NYNEX (Gibraltar).
- (4) other than Verizon (*see* paragraph (j)(3) above), no foreign carrier, and no party that controls a foreign carrier, controls more than 25 percent of VLD.

²¹ *Id.* at ¶ 415.

(k) All of the countries listed in paragraph (j)(3) above are treated as members of the World Trade Organization.²²

(l), (m) VLD is eligible for non-dominant treatment on all routes except U.S.-Dominican Republic, U.S.-Gibraltar, and U.S.-Venezuela. VLD's affiliated foreign carriers in Mexico (Iuscell), Canada (TELUS, Quebec Tel, and Clearnet), Argentina (CTI), France (FLAG), Italy (FLAG), Japan (GTEFFE and FLAG), Netherlands (FLAG), Singapore (FLAG), and the United Kingdom (FLAG) lack market power in those destination markets. As stated above, the Commission has already determined that Iuscell lacks market power in Mexico. Moreover, the Commission has previously determined that Verizon was entitled to non-dominant treatment on the U.S.-Canada route.²³ Because CTI controls only mobile wireless facilities in Argentina, it also lacks the ability to discriminate against unaffiliated U.S. carriers terminating traffic in Argentina and should be classified as non-dominant on the U.S.-Argentina route.²⁴ Furthermore, because GTEFFE and FLAG are just two of many Special Type II and Type I licensees in Japan, have tiny market shares in Japan, and compete with KDD and NTT (carriers the Commission has classified as dominant), VLD should be treated as non-dominant on the U.S.-Japan route. In addition, because VLD's foreign affiliates in France, Singapore, and the United Kingdom have trivial market shares and compete directly with carriers the Commission has previously classified

²² The U.S. Department of State has concluded that the 1994 Marrakesh Agreement Establishing the World Trade Organization applies to Gibraltar. See *Merger Order* at ¶ 412.

²³ Although TELUS has acquired a 98% interest in Clearnet since the Commission's determination that Verizon was entitled to non-dominant treatment on the U.S.-Canada route, VLD is still entitled to a presumption of non-dominance on that route because Clearnet only controls mobile facilities in Canada. Therefore, Clearnet lacks the ability to discriminate against U.S. carriers terminating traffic in Canada. Cf. 47 C.F.R. § 63.12(c)(1)(iii).

²⁴ *Id.*

as dominant (France Telecom, British Telecom, and Singapore Telecom, respectively), VLD lacks the ability to discriminate against U.S. international carriers terminating traffic in those countries. Therefore, VLD is entitled to non-dominant treatment on the U.S.-France, U.S.-Singapore, and U.S.-UK routes. Moreover, because VLD's affiliates control no facilities in Italy or the Netherlands, VLD should be regulated as a non-dominant carrier on the U.S.-Italy and the U.S.-Netherlands routes. Accordingly, pursuant to section 63.10(a)(3) of the Commission's rules, VLD is entitled to non-dominant status on each of the following affiliated routes: U.S.-Mexico, U.S.-Canada, U.S.-Argentina, U.S.-France, U.S.-Italy, U.S.-Japan, U.S.-Netherlands, U.S.-Singapore, and U.S.-UK.

VLD's affiliated carriers in the Dominican Republic (CODETEL), Gibraltar (Gibraltar NYNEX), and Venezuela (CANTV) have not yet been declared non-dominant. Accordingly, VLD certifies that it will comply with the Commission's dominant carrier regulations (including the requirements of sections 63.10 and 43.61 of the Commission's rules) with respect to its provision of facilities-based services along each of the following affiliated routes: U.S.-Dominican Republic and U.S.-Venezuela. VLD does not seek to serve Gibraltar on a facilities basis.

Finally, as stated above, VLD plainly qualifies as a non-dominant carrier for resale authority to or from all countries except Gibraltar, the Dominican Republic, and Venezuela. VLD notes that it is not subject to dominant carrier obligations on the U.S.-Gibraltar, U.S.-Dominican Republic, and U.S.-Venezuela routes to the extent that it serves those routes by reselling the international switched services of unaffiliated U.S. facilities-based carriers, but will comply with the dominant carrier regulations on these routes to the extent it serves these routes by reselling the international switched services of unaffiliated U.S. facilities-based carriers.

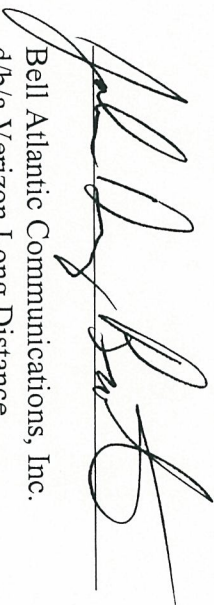
(n) VLD hereby certifies that it has not agreed to accept special concessions, as defined in section 63.14 of the Commission's rules, 47 C.F.R. § 63.14(b), directly or indirectly from any foreign carrier where the foreign carrier possesses market power on the foreign end of the route and will not enter into such agreements in the future, except as permitted by section 63.14.

(o) VLD certifies, pursuant to sections 1.2001 and 1.2003 of the Commission's rules, 47 C.F.R. §§ 1.2001-2003, that no party to this 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.

CONCLUSION

For the reasons stated above, VLD respectfully urges the Commission to grant this application no later than the date of its pending section 271 application for Massachusetts.

Respectfully submitted,



Bell Atlantic Communications, Inc.
d/b/a Verizon Long Distance
1320 N. Courthouse Road, 2nd Floor
Arlington, VA 22201
(703) 526-3356

Dated: November 21, 2000

READ INSTRUCTIONS CAREFULLY

FEDERAL COMMUNICATIONS COMMISSION

APPROVED BY OMB

3060-0589

BEFORE PROCEEDING
Electronic Fee Audit Code:
167552203251409

REMITTANCE ADVICE

(1) LOCKBOX # 358115

PAGE NO. 1 OF 1

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SECTION A - PAYER INFORMATION

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card)
VERIZON

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

(4) STREET ADDRESS LINE NO. 1
1850 M Street NW

(5) STREET ADDRESS LINE NO. 2
Suite 1200

(6) CITY
Washington, DC

(7) STATE
DC

(8) ZIP CODE
20036

(9) DAYTIME TELEPHONE NUMBER (include area code)
202-463-5295

(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)

Verizon Long Distance ("VLD")

(12) STREET ADDRESS LINE NO. 1

(13) STREET ADDRESS LINE NO. 2

(14) CITY

(15) STATE

(16) ZIP CODE

(17) DAYTIME TELEPHONE NUMBER (include area code)
202-463-5295

(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 IDENTIFIER ID
Int'l 214 Appl.

(20A) PAYMENT TYPE CODE (PTC)
C U T

(21A) QUANTITY
1

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

FCC USE ONLY

(21A) FCC CODE 1

(22A) FCC CODE 2

(19B) FCC CALL IDENTIFIER ID

(20B) PAYMENT TYPE CODE (PTC)

(21B) QUANTITY

(22B) FEE DUE FOR PTC IN BLOCK B

FCC USE ONLY

(21B) FCC CODE 1

(22B) FCC CODE 2

(19C) FCC CALL IDENTIFIER ID

(20C) PAYMENT TYPE CODE (PTC)

(21C) QUANTITY

(22C) FEE DUE FOR PTC IN BLOCK C

FCC USE ONLY

(21C) FCC CODE 1

(22C) FCC CODE 2

(19D) FCC CALL IDENTIFIER ID

(20D) PAYMENT TYPE CODE (PTC)

(21D) QUANTITY

(22D) FEE DUE FOR PTC IN BLOCK D

FCC USE ONLY

(21D) FCC CODE 1

(22D) FCC CODE 2

SECTION D - TAXPAYER INFORMATION (REQUIRED)

(23) PAYER TIN
0 1 3 1 6 7 5 5 2 2

APPLICANT TIN

0 5 4 1 7 6 2 6 5 7

(24) CERTIFICATION STATEMENT

SECTION E - CERTIFICATION

I, _____, 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 _____

SECTION F - CREDIT CARD PAYMENT INFORMATION

MASTERCARD

EXPIRATION DATE:
MONTH YEAR

AUTHORIZED SIGNATURE

DATE

SEE PUBLIC BURDEN ESTIMATE ON REVERSE

FCC FORM 159 JULY 1997 (REVISED)