SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

3000 K Street, NW, Suite 300 Washington, DC 20007-5116 Telephone (202)424-7500 FACSIMILE (202) 424-7647

TO

NEW YORK OFFICE 405 LEXINGTON AVENUE PECTON PET 10174

2000

DEC

December 4, 2000

VIA COURIER

TALKINGNETS HOLDINGS, LLC Streamlined

ITC-214-20001204-00708

Secretary Ms. Magalie Roman Salas, Esq.

Federal Communications Commission

International Bureau Telecommunications Division Box 358115

Pittsburgh, PA 15251-5115

Re: States and Various International Points International Facilities-based Carrier and Resale Carrier between the Section 214 of the Communications Act of 1934, as Amended, to Operate as an Application of TalkingNets Holdings, LLC, for Global Authority Pursuant to United

Dear Ms. Salas:

carrier and as an international resale carrier between the United States and various International of the Communications Act of 1934, as amended, to operate as an international facilities-based application of TalkingNets Holdings, LLC requesting global authority, pursuant to Section 214 Enclosed for filing with the Commission are an original and six (6) copies of the

stamped envelope. Please date stamp the extra copy of this application and return it in the enclosed self-addressed, Benjamin L. Arizmendi at (202) 295-8455. As required by the Commission's Rules, a check in the amount of \$815.00 is enclosed. Any questions regarding the enclosed application should be addressed to

Respectfully submitted

Russell M. Blau

Counsel for TalkingNets Holdings, LLC

Enclosures

Benjamin L. Arizmendi Steve Goodman

READ INSTRUCTIONS CAREFULLY		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		APPROVED BY OMB 3000-3688
(1) LOCKBOX # 358115		REMITTANCE ADVICE	CE ADVICE	SPECIAL USE
2) PAYER NAME (I' paying by graft and area riams access) as a appears an your Talking Net's Holdings, LLC	i è appears on yeur card)			(3) TOTAL AMOUNT PAID (dollars and cents) \$815.00
(1) STREET ADDRESS UNE NO. 1 1111 Military Cutoff Rd., Suite	221			
(5) STREET ADDRESS LINE NO. 2				
(9 city Wilmington			NC No state	(8.2.1°CODE) 28405
(9) DAYTIME TELEPHONE NUMBER (include area code) (910) 256-0770	include area code)		(10) COUNTRY CODE (If not in U.S.A.)	
IF	PAYER NAI IF MORE	ME AND THE APPLICANT, THAN ONE APPLICANT, T	NAME ARE DIFFERE	IF PAYER NAME AND THE APPLICANT NAME ARE DIFFERENT, COMPLETE SECTION B IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C)
(11) APPLICANT NAME (if paying by credit card	enter name	SECTION B - APPLICANT INFORMATION (Macdy as it appears on your card)	T INFORMATION	
(12) STREET ADDRESS LINE NO. 1				
(13) STREET ADDRESS LINE NO. 2				
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(23A) FCC CODE 1	,	,	(24A) FCC CODE 2	CCODE 2
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(23D) FCC CODE 1			(24D) FCC CODE 2	CODE 2
(A)	SECTION	D-	INFORMATIO	TAXPAYER INFORMATION (REQUIRED)
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		SECTION E -	N E - CERTIFICATION	2
(27) CERTIFICATION STATEMENT Russell M. Blau			er penalty of perjury that the fore	egoing and supporting information are true and correct to
(PRINT NAME) he best of my knowledge, information and belief. SIGNATURE	nd belief. SIGNA	Jusel	1 Ble	MBC
(28) MASTER	MASTERCARDIVISA ACCOUNT NUMBER:		SECTION F - CREDIT CARD PAYMENT INFORMATION	VATION EXPIRATION DATE:
MASTERCARD * *	•	*	*	* * * *
I hereby authorize the Fr	hereby authorize the FCC to charge my MSA or MASTERCARD for the service (ethorization(e) herein described.		AUTHORIZED SIGNATURE	OME

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

Telecom Division

International Bureau

of 1934, as amended, to Operate as an Section 214 of the Communications Act International Points Between the United States and Various International Facilities-Based and Resale Carrier Application for Global Authority Pursuant to TalkingNets Holdings, LLC In the Matter of File No. ITC-214-2000-

APPLICATION

between the United States and international points the Commission's Rules, 47 C.F.R. § 63.18, to provide international telecommunications services the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. § 214, and Section 63.18 of hereby requests global facilities-based authority and global resale authority, under Section 214 of TalkingNets Holdings, LLC ("TalkingNets" or "Applicant"), by its undersigned counsel,

THE APPLICANT

processing. any affiliation with a foreign carrier in any country where it intends to provide services. Therethe State of Delaware. Commission's Rules, 47 C.F.R. Delaware Corporation. TalkingNets is not a foreign telecommunications carrier nor does it have TalkingNets qualifies for a presumption of non-dominance under Section 63.10(a)(1) of the TalkingNets Holdings, LLC is a limited liability company organized under the laws of Applicant is a wholly-owned subsidiary of TalkingNets, Inc., which is a § 63.10(a)(1), and its application is eligible for streamlined

II. PUBLIC INTEREST CONSIDERATIONS

pricing and increased availability of a variety of service options. benefit consumers of United States-overseas services. Application will further the public interest Applicant believes that the added competition its entry will bring to the market will These benefits include competitive Therefore, a grant of this

III. INFORMATION REQUIRED BY SECTION 63.18

mission's Rules, in support of its request for Section 214 authorization: Applicant submits the following information, as required by Section 63.18 of the Com-

(a) Name, address and telephone number of Applicant:

Telephone: (910) 332-1899 Facsimile: (910) 332-1801 Wilmington, NC 28405 1111 Military Cutoff Rd., Suite 221 TalkingNets Holdings, LLC

Applicant is organized under the laws of the State of Delaware

b

(c) Correspondence concerning this application should be sent to:

Fax: Tel: 3000 K Street, N.W., Suite 300 SWIDLER BERLIN SHEREFF FRIEDMAN, LLP Washington, D.C. 20007 Russell M. Blau (202) 424-7643 (202) 424-7500

with a copy to:

Telephone: (910) 332-1899 Facsimile: (910) 332-1801 Wilmington, NC 28405 TalkingNets Holdings, LLC Steve Goodman 1111 Military Cutoff Rd., Suite 221

- sion's Rules carrier and reseller with global authority, pursuant to Section 214 of the Act and the Commisgrant of this Application, TalkingNets will become an authorized non-dominant facilities-based (d) Applicant has not previously received authority under Section 214 of Act. Upon
- rier Rules it will comply with the terms and conditions of Sections 63.21 and 63.22 of the Commission's authorization for all international routes authorized by the Commission. pursuant (e) to Ξ Section 63.18(e)(1) of the Commission's Rules. Applicant requests Section 214 authority to operate as a facilities-based car-Applicant requests such Applicant certifies that
- Section 63.21 and 63.23 of the Commission's Rules Commission. sion's Rules. services of authorized U.S. common carriers pursuant to Applicant certifies that it will comply with the terms and conditions contained in Applicant requests such authorization for all international routes authorized by the 2 Applicant also requests Section 214 authority Section 63.18(e)(2) of the Commisto resell the international
- (e) of Section 63.18 of the Commission's Rules (f) Applicant seeks authority to provide only the services referenced under paragraph
- 63.18(e)(4) of the Commission's Rules, this Section is not applicable (8) Because Applicant is not seeking facilities-based authority pursuant to Section
- is as follows (h) Information regarding TalkingNets' 10% or greater direct or indirect shareholders

Name: TalkingNets, Inc.

Address: 1111 Military Cutoff Rd., Suite 221

Wilmington, NC 28405

Percentage Held: 100%

Citizenship: United States (Delaware corporation)

Principal Business: Communications

The following persons or entities hold a ten percent (10%) or greater, direct or

indirect, ownership interest in TalkingNets, Inc.:

Name: John Philips, President and CEO, TalkingNets, Inc. 1111 Military Cutoff Rd., Suite 221

Address:

Wilmington, NC 28405

Percentage Held:

Citizenship: United States

Name Address: Anatol Surak, Secretary & Treasurer, TalkingNets, Inc.

1111 Military Cutoff Rd., Suite 221

Wilmington, NC 28405

Percentage Held:

Citizenship United States

Name Charles River Ventures

Address: Bay Colony Corporate Center

1000 Winter Street

Suite 3300

Waltham, Massachusetts, 02451

Percentage Held 23.01%

Citizenship United States

Principal Business: Venture Capital

Name Address: 30 Rockefeller Plaza Venrock Associates

Room 5508

New York, NY 10112

Percentage Held 23.96%

Citizenship United States

Principal Business: Venture Capital

No persons or entities with equity participation in Charles River Ventures or Venrock

Associates hold a ten percent (10%) or greater, direct or indirect ownership interest in

TalkingNets, Inc

TalkingNets, Inc. does not have any interlocking directorates with a foreign carrier

- foreign carrier Ξ TalkingNets certifies that it is not a foreign carrier and is not affiliated with any
- sion's Rules apply cations services to any destination country to which Sections 63.18 (j)(1)-(4) of the Commis- \bigcirc TalkingNets certifies that it does not seek to provide international telecommuni-
- services pursuant to Section 63.18(j)(1)-(4) of the Commission's Rules, Section 63.18(k) of the Commission's Rules is inapplicable. 8 Because TalkingNets does not seek to provide international telecommunications
- SI. not a foreign carrier nor is it affiliated with a foreign carrier (Ξ) Section 63.18 (I) of the Commission's Rules is inapplicable because TalkingNets
- is not a foreign carrier nor is it affiliated with a foreign carrier. (\mathbb{H}) Section 63.18 (m) of the Commission's Rules is inapplicable because TalkingNets
- indirectly with any foreign carrier whatsoever (n) TalkingNets has not agreed to accept special concessions either directly or
- party to its application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988 mission's Rules (implementing 0 TalkingNets. certifies, pursuant to Sections 1.2001 through 1.2003 of the the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 3301), that no Com-

:,

IV. CONCLUSION

Application. public interest, convenience, and necessity would be furthered by a grant of this Section 214 For the reasons stated above, TalkingNets Holdings, LLC respectfully submits that the

Respectfully submitted,

Russell M. Blau

SWIDLER BERLIN SHEREFF FRIEDMAN, LLP 3000 K Street, N.W., Suite 300

Washington, DC 20007 Tel: (202) 424-7500

Fax: (202) 424-7645

Counsel for TalkingNets Holdings, LLC

Dated: