

READ INSTRUCTIONS CAREFULLY  
BEFORE PROCEEDING

APPROVED BY OMB 3060-0589

FEDERAL COMMUNICATIONS COMMISSION  
**REMITTANCE ADVICE**

PAGE NO 1 OF 1  
**FCC REMITTANCE**  
**FFB 16 2001**

SPECIAL USE  
FCC USE ONLY

(1) LOCKBOX # **358115**

**SECTION A - PAYER II**

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card)  
**Wiley, Rein & Fielding**

**Streamlined**  
INTERNATIONAL TELECOMMUNICATIONS CLEARING CORPORATION

ITC-214-20010216-00094

(4) STREET ADDRESS LINE NO. 1  
**1776 K Street, N.W.**

(5) STREET ADDRESS LINE NO. 2

(6) CITY  
**Washington**

(7) STATE  
**DC**

(8) ZIP CODE  
**20006**

(9) DAYTIME TELEPHONE NUMBER (include area code)  
**(202) 719-7000**

(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)  
**International Telecommunications Clearing Corporation**

(12) STREET ADDRESS LINE NO. 1  
**c/o Corporation Service Company**

(13) STREET ADDRESS LINE NO. 2  
**1013 Centre Road**

(14) CITY  
**Wilmingtton**

(15) STATE  
**DE**

(16) ZIP CODE  
**19805**

(17) DAYTIME TELEPHONE NUMBER (include area code)  
**212-704-6000**

(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 (PTO)

(21A) QUANTITY  
**1**

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

FCC USE ONLY

(23A) FCC CODE 1

(24A) FCC CODE 2

(19B) FCC CALL SIGN/OTHER ID

(20B) PAYMENT TYPE CODE (PTO)

(21B) QUANTITY

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

FCC USE ONLY

(23B) FCC CODE 1

(24B) FCC CODE 2

(19C) FCC CALL SIGN/OTHER ID

(20C) PAYMENT TYPE CODE (PTO)

(21C) QUANTITY

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

FCC USE ONLY

(23C) FCC CODE 1

(24C) FCC CODE 2

(19D) FCC CALL SIGN/OTHER ID

(20D) PAYMENT TYPE CODE (PTO)

(21D) QUANTITY

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

FCC USE ONLY

(23D) FCC CODE 1

(24D) FCC CODE 2

**SECTION D - TAXPAYER INFORMATION (REQUIRED)**

(25) PAYER TIN  
**0 5 2 1 2 8 9 9 8 8**

(26) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-11 IS DIFFERENT FROM PAYER NAME IN A-2  
**APPLICANT TIN 0 P E N D I N G**

**SECTION E - CERTIFICATION**

(27) CERTIFICATION STATEMENT  
I, John Papandrea (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 John Papandrea

**SECTION F - CREDIT CARD PAYMENT INFORMATION**

(28) MASTERCARD/VISA ACCOUNT NUMBER

EXPIRATION DATE

MASTERCARD

VISA

MONTH YEAR

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

AUTHORIZED SIGNATURE

DATE

SEE PUBLIC BURDEN ESTIMATE ON REVERSE

FCC FORM 159 JULY 1997 (REVISED)

This check is GREEN

# WILEY, REIN & FIELDING

# 134777

1776 K Street, N.W.  
Washington, DC

## Operating Account

Date	Amount
02/15/2001	*****815.00

Pay Eight Hundred Fifteen and 00/100 Dollars ONLY

To the  
Order of FEDERAL COMMUNICATIONS COMMISSION

Bank of America, N.A.  
Washington, DC

*Barry J. Staines*  
(Two Signatures Required For Amounts Over \$1,000.00)

⑈ 134777⑈ ⑆054001204⑆ ⑈000003702987⑈

Attached is our check in full settlement of items shown hereon. If not correct, please return with explanation or call us at (202)719-7512.

FEDERAL COMMUNICATIONS COMMISSION

No. **134777**  
Check Date 02/15/2001

Description	Date	Invoice No.	Amount of Invoice	Discount	Net
FILING FEE	02/15/2001		815.00	.00	815.00
<b>Total</b>					<b>815.00</b>

Remittance Advice  
Detach before depositing

# WILEY, REIN & FIELDING

  
Operating Account



Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

FEB 23 2001  
Telecom Division  
International Bureau

In the Matter of )  
)  
International Telecommunications ) File No. ITC-214-\_\_\_\_\_  
Clearing Corporation )  
)  
Global Blanket Application Pursuant to )  
Section 214 of the Communications )  
Act of 1934, as Amended, for Authority to )  
Operate as an International Facilities-Based )  
and Resale Carrier )

**GLOBAL BLANKET APPLICATION FOR SECTION 214 AUTHORITY**

International Telecommunications Clearing Corporation (“ITCC” or “Applicant”) hereby requests authority under Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, and Section 63.18 of the Commission’s Rules, 47 C.F.R. §§ 63.18, to operate as an international facilities-based and resale carrier between the United States and all international points, except those countries listed on the Federal Communications Commission’s (“FCC” or the “Commission”) exclusion list. Specifically, Applicant requests authority to provide facilities-based switched and facilities-based non-interconnected and interconnected private line, resold switched and resold interconnected and non-interconnected private line services<sup>1</sup> on either a

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<sup>1</sup> ITCC will restrict its provision of interconnected private line services, on either a facilities or resold basis, to foreign destinations previously or hereafter approved by the Commission for international simple resale (“ISR”) or to foreign carriers that lack market power in the country at the foreign end of the private line. See 47 C.F.R. §§ 63.22(e)(1)-(e)(2), 63.23(d)(1)-(d)(2).

facilities or resold basis between the United States and all international destinations, except those points on the Commission's exclusion list.

ITCC's request for global blanket authority to provide international services as a facilities-based and resale carrier will further the public interest, convenience, and necessity. Applicant's entrance into the United States international services market will promote competition, lower prices for international services, and permit more efficient use of existing international telecommunications facilities.

ITCC requests to be classified as non-dominant. Applicant is entitled to a presumption of non-dominance on all routes under Section 63.10(a)(1),(3) of the Commission's Rules, 47 C.F.R § 63.10(a)(1),(3), it has no affiliation with any dominant foreign carrier, and is not itself a foreign carrier, operating in any international point.

In support of its request for global blanket Section 214 authorization to provide facilities-based and resold services, Applicant submits the following information pursuant to Section 63.18 of the Commission's Rules, 47 C.F.R. § 63.18:

- (a) The name, address, and telephone number of the Applicant:  
  
International Telecommunications Clearing Corporation  
c/o Corporation Service Company  
1013 Centre Road  
Wilmington, DE 19805  
212-704-6000

- (b) Applicant is organized under the laws of the state of Delaware.

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

Ms. Nikki Nguyen  
Legal Counsel  
P.O. Box 74500  
Dubai, U.A.E.  
011-971-4-330-3778

Please send copies of any correspondence to:

R. Michael Senkowski  
John F. Papandrea  
Wiley, Rein & Fielding  
1776 K Street, NW  
Washington, D.C. 20006  
202-719-7000

- (d) Applicant has not received any prior Section 214 authorizations.
- (e)(1), (2), (f) Pursuant to the terms and conditions of sections 63.18(e)(1) and 63.18(e)(2) of the Commission's Rules, 47 C.F.R. §§ 63.18(e)(1)-(e)(2), Applicant requests Section 214 authorization to operate as a facilities-based and resale carrier between the United States and all international destinations, except those countries listed on the FCC's exclusion list. Applicant certifies that it will comply with the terms and conditions contained in sections 63.21, 63.22, and 63.23 of the Commission's Rules, 47 C.F.R. §§ 63.21, 63.22, 63.23.

(g) Not applicable.

(h) The name, address, citizenship, and principal business of the Applicant's ten percent or greater shareholders are:

International Telecommunications Clearing Corporation Limited ("ITCC Parent")  
(a company organized under the laws of Bermuda)  
Cedar House, 41 Cedar Avenue  
Hamilton HM12  
BERMUDA  
Principal Business: Telecommunications  
Ownership interest: 100 percent

The only entity that owns 10 percent or more of the equity in International Telecommunications Clearing Corporation Limited ("ITCC BVI"), a company incorporated under the laws of the British Virgin Islands. Its registered address is:

ITCC Limited  
Trident Trust Company (B.V.I.) Limited  
Trident Chambers  
P.O. Box 146

Tortola, British Virgin Islands  
Principal Business: Telecommunications

Through their ownership of ITCC BVI, the following individuals own 10 percent or more of the Applicant's equity:

Bonaventure C.K. Wong  
P.O. Box 74500  
Dubai, U.A.E.  
Citizenship: Canadian  
Principal Business: Telecommunications  
Ownership Stake in ITCC BVI: 62 percent

Urs Barandun  
P.O. Box 35764  
Dubai, U.A.E.  
Citizenship: Swiss  
Principal Business: Management Consulting  
Ownership Stake in ITCC BVI: 19 percent

Jurg Baumberger  
P.O. Box 35764  
Dubai, U.A.E.  
Citizenship: Swiss  
Principal Business: Management Consulting  
Ownership Stake in ITCC BVI: 19 percent

- (i) Applicant is “affiliated” with International Telecommunications Clearing Corporation Limited (“ITCC UK”), an indirect, wholly-owned subsidiary of ITCC Parent organized as a company under the laws of England and Wales. ITCC UK holds an international simple voice resale (“ISVR”) license in the United Kingdom. Therefore, by virtue of its affiliation with ITCC UK through ITCC Parent, Applicant is affiliated with a “foreign carrier” in the United Kingdom under the Commission’s definitions of “foreign carrier” and “affiliated.” See 47 C.F.R. §§ 63.09(d),(e).
- (j) Applicant seeks to provide international telecommunications services on the U.S.-UK route and on all other routes between the United States and all other foreign countries except those on

the Commission's exclusion list. Accordingly, pursuant to Section 63.18(j) of the Commission's Rules, 47 C.F.R. § 63.18(j), Applicant certifies that it is an indirect, wholly-owned subsidiary of ITCC Parent, and a "sister" company of ITCC UK, which is a "foreign carrier" in the United Kingdom. Accordingly, Applicant certifies that it is "affiliated" with ITCC UK, a foreign carrier in the United Kingdom.

(k) The United Kingdom is a Member of the WTO. In addition, because ITCC UK is a new carrier that does not yet have any customers, it clearly lacks market power in the highly-competitive UK telecommunications market.

(l) Not applicable.

(m) Applicant proposes to provide facilities-based and resale international telecommunications services between the United States and all international destinations, except those countries listed on the FCC's exclusion list. The countries that Applicant proposes to serve, thus, include the United Kingdom, a jurisdiction in which the Applicant is affiliated with a foreign carrier.

Applicant satisfies Section 63.10(a)(3) of the Commission's Rules, 47 C.F.R. § 63.10(a)(3) for the United Kingdom because Applicant's foreign affiliate in the United Kingdom, ITCC UK, is a new company that has not yet begun to provide service. The telecommunications market in the United Kingdom is highly competitive, and ITCC UK is one of hundreds of carriers authorized to provide ISVR. Moreover, it is unaffiliated with British Telecom, which does have market power.<sup>2</sup> Consequently, ITCC UK does not have a 50 percent market share in the international transport and local access markets in the United Kingdom or the ability to affect competition adversely in the U.S. market.

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<sup>2</sup> See List of Foreign Telecommunications Carriers that are Presumed to Possess Market Power in (Continued...)

- (n) Applicant certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future.
- (o) Applicant certifies pursuant to Section 1.2001 through 1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-1.2003, that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853(a).
- (p) This Application qualifies for streamlined processing under Section 63.12(a) of the Commission's Rules, 47 C.F.R. §§ 63.12 (a), because Applicant qualifies for a presumption of non-dominance under Section 63.10(a)(3), 47 C.F.R. § 63.10(a)(3), and the affiliated destination market is an WTO Member country. *See* Paragraph (m).

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(...Continued)

Foreign Telecommunications Markets, DA 99-809 (Public Notice) (June 18, 1999).



## CONCLUSION

For the foregoing reasons, ITCC requests that the Commission grant it Section 214 authorization to offer facilities-based and resale services between the United States and all international points.

Respectfully submitted,

International Telecommunications Clearing Corporation

By: \_\_\_\_\_



Nikki Nguyen  
International Telecommunications Clearing Corporation

February 14, 2001