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A LIMITED LIABILITY PARTNERSHIP

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FEB 26 2001

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February 26, 2001

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Telecom Division  
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Federal Communications Commission  
International Bureau - Telecommunications  
P.O. Box 358115  
Pittsburgh, PA 15251-5115

Re: In the Matter of Quantitude, Inc.  
Application for Authority Under Section 214  
to Operate as a Facilities-Based and Resale Carrier

Dear Sir or Madam:

On behalf of Quantitude, Inc., enclosed for filing are the original and five copies of the above-referenced Application. Also enclosed with this filing are the FCC Form 159 Remittance Advice, a check in the amount of \$815.00 to cover the filing fee, and a duplicate copy of the filing. Please date-stamp the duplicate and return to the courier.

If there are any questions regarding this filing, please contact me at the above number.

Sincerely,

  
Joan M. Griffin

Enclosures



**KELLEY DRYE & WARREN LLP**  
1200 19TH STREET, N.W.  
WASHINGTON, DC 20036

006586

15-122/5-40  
BRANCH 00480

DATE 2/26/01

PAY TO THE ORDER OF Federal Communications Commission

\$ 815.00

Eight hundred fifteen and no/100 DOLLARS

**FIRST UNION**  
First Union National Bank  
R/T 054001220

⑆00006586⑆ ⑆054001220⑆ 2000034690853⑆

*Alverson K. Lambert*  
MP

DETACH AND RETAIN THIS STATEMENT  
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW. IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.  
KELLEY DRYE & WARREN LLP

DATE	DESCRIPTION	AMOUNT
2/26/01	Charge 012978.0002 for filing fee for Section 214 Application	\$815.00



Pursuant to Section 63.18 of the Commission's Rules, Quantitude sets forth the following information in support of this Application:

(a) The name, address, and telephone number of the Applicant is:

Quantitude, Inc.  
5350 South Valentia Way  
Englewood, CO 80111  
(303) 397-5434

(b) Quantitude is a corporation organized under the laws of the State of Delaware.

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

Randy Reid  
Chief Legal Officer  
Quantitude, Inc.  
5350 South Valentia Way  
Englewood, CO 80111  
(303) 397-5434

with copies to:

Joan M. Griffin  
Kelley Drye & Warren, LLP  
1200 19th Street, NW  
Washington, DC 20036  
(202) 955-9600

(d) Quantitude has not previously received Section 214 authority from the Commission.

(e) Quantitude is applying for authority to operate as a facilities-based carrier pursuant to the terms and conditions of Section 63.18(e)(1) of the Commission's Rules and as a resale carrier pursuant to the terms and conditions of Section 63.18(e)(2) of the Commission's Rules. Quantitude seeks authority to provide service to all locations possible under a grant of global authority. As evidenced by the certification provided in Attachment A, Quantitude 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.

(f) No response required.

(g) Quantitude will use previously authorized facilities to provide its facilities-based

services and thus this Application is categorically excluded from environmental assessment pursuant to Section 1.1306 of the Commission's Rules.

(h) Galileo International, Inc. ("Galileo") holds 100 percent of the ownership interest in Quantitude. Galileo is a Delaware corporation whose address is 9700 West Higgins Road, Suite 400, Rosemont, IL 60018. The principal business of Galileo is the provision of electronic global distribution services for the travel industry. UAL Corporation ("UAL") indirectly holds approximately 17 percent of the ownership interest in Galileo (and thus in Quantitude, under the Commission's ownership attribution rules). UAL is a Delaware corporation whose address is 1200 East Algonquin Road, Elk Grove Township, IL 60007. UAL is a holding company; its principal subsidiary is United Air Lines, Inc., a commercial air transportation company. There are no other 10 percent or greater shareholders of Quantitude, and there are no interlocking directorates with foreign carriers.

(i) As evidenced by the certification provided in Attachment A, Quantitude is not affiliated with any foreign carrier.

(j), (k), (l), and (m)

Not applicable; Quantitude is not affiliated or otherwise related to any foreign carrier on any of the routes Quantitude proposes to serve in this Application.

(n) As evidenced by the certification provided in Attachment A, Quantitude 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) As evidenced by the certification provided in Attachment A, 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.

(p) Quantitude requests streamlined processing pursuant to Section 63.12 of the Commission's Rules. This Application is eligible for streamlined processing because Quantitude is not affiliated with foreign carriers on any route for which authority is sought, Quantitude is not affiliated with any dominant U.S. carrier whose services Quantitude may resell, and Quantitude is not requesting authority to provide switched services over private lines to countries not previously authorized for this service.

For these reasons, Quantitude requests that the Commission grant this Application.

Respectfully Submitted,

**QUANTITUDE, INC.**

By: 

Randy Reid  
Chief Legal Officer  
QUANTITUDE, INC.  
5350 South Valentia Way  
Englewood, CO 80111  
(303) 397-5434

Joan M. Griffin  
KELLEY DRYE & WARREN LLP  
1200-19th Street, N.W.  
Suite 500  
Washington, D.C. 20036  
(202) 955-9600

Its Attorneys

Date: \_\_\_\_\_

CERTIFICATE

The undersigned hereby certifies, on behalf of Quantitude, Inc. ("Quantitude") with respect to the foregoing application for authority to provide international service, that:

1. Quantitude is not affiliated with any foreign carrier in any of the countries to which Quantitude proposes to provide service in the foregoing application.
2. Quantitude will comply with the terms and conditions contained in Sections 63.21, 63.22, and 63.23 of the Commission's Rules.
4. Quantitude 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.
4. No party to this application is subject to a denial for Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853(a).

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



Title: \_\_\_\_\_

Attorney-in-fact

Date: \_\_\_\_\_

16 February 2001