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A LIMITED LIABILITY PARTNERSHIP

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QUANTITUDE, INC. Streamlined

ITC-214-20010226-00100

www.kellevdrve.com (202) 955-9792

February 26, 200

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AFFILIATE OFFICES

International Bureau Telecom Division

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

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

Dear Sir or Madam:

duplicate copy of the filing. Please date-stamp the duplicate and return to the courier. 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 On behalf of Quantitude, Inc., enclosed for filing are the original and five copies

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

Sincerely

Joan M. Griffin

Enclosures

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

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Before the FEDERAL COMMUNICATIONS COMMISSION

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Telecom Division International Bureau

| Line Services to Various Points | Resale Carrier for the Provision of | Act of 1934, as Amended, to Operate | Section 214 of the Communications | Application for Authority Under | OHANTITUDE, INC. | In the Matter of |
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| | , | | | |) Docket No. | |

APPLICATION

authority to (1) operate as a facilities-based carrier pursuant to the terms and conditions of Section of the Communications Act of 1934, as amended ("the Act"), 47 U.S.C. § 214, hereby requests 63.18(e)(1) of the Commission's Rules, and (2) operate as a resale carrier pursuant to the terms and any foreign carrier in any of the destination countries for which authority is requested, nor is conditions of Section 63.18(e)(2) of the Commission's Rules. Quantitude has no affiliation with Application is entitled to streamlined processing under Section 63.12 of the Commission's Rules nondominant carrier in its provision of international service on all routes. Furthermore, this pursuant to Section 63.10(a)(1) of the Commission's Rules, Quantitude should be classified as a Quantitude affiliated with any dominant U.S. carrier whose services Quantitude may resell. Thus, Quantitude, Inc. ("Quantitude" or "Applicant"), by its attorneys and pursuant to Section 214

specifically approved by the Commission for the provision of such services. authority in this Application to provide such services only to those particular locations With respect to the provision of switched services over private lines, Quantitude seeks

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.
- <u>O</u> 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

- **a** Quantitude has not previously received Section 214 authority from the Commission.
- (e) service to all locations possible under a grant of global authority. As evidenced 63.18(e)(2) of the Commission's Rules. Quantitude seeks authority to provide 63.23 of the Commission's Rules. comply with the terms and conditions contained in Sections 63.21, 63.22, and by the certification provided in Attachment A, Quantitude certifies that it will Rules and as a resale carrier pursuant to the terms and conditions of Section pursuant to the terms and conditions of Section 63.18(e)(1) of the Commission's Quantitude is applying for authority to operate as a facilities-based carrier
- (f) No response required.
- 8 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) transportation company. There are no other 10 percent or greater shareholders of company; its principal subsidiary is United Air Lines, Inc., a commercial air ownership attribution rules). UAL is a Delaware corporation whose address is ownership interest in Galileo (and thus in Quantitude, under the Commission's is the provision of electronic global distribution services for the travel industry. Higgins Road, Suite 400, Rosemont, IL 60018. The principal business of Galileo in Quantitude. Galileo is a Delaware corporation whose address is 9700 West Galileo International, Inc. ("Galileo") holds 100 percent of the ownership interest UAL Corporation ("UAL") indirectly holds approximately 17 percent of the Quantitude, and there are no interlocking directorates with foreign carriers 1200 East Algonquin Road, Elk Grove Township, IL 60007. UAL is a holding
- Ξ affiliated with any foreign carrier As evidenced by the certification provided in Attachment A, Quantitude is not
- (j), (k), (l), and (m)

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

- (E) sufficient market power on the foreign end of the route to affect competition with respect to any U.S. international route where the foreign carrier possesses agreed to accept special concessions directly or indirectly from any foreign carrier adversely in the U.S. market and will not enter into such agreements in the future As evidenced by the certification provided in Attachment A, Quantitude has not
- 0 the Anti-Drug Abuse Act of 1988. 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
- **(g)** authority is sought, Quantitude is not affiliated with any dominant U.S. carrier because Quantitude is not affiliated with foreign carriers on any route for which to provide switched services over private lines to countries not previously whose services Quantitude may resell, and Quantitude is not requesting authority Quantitude requests streamlined processing pursuant to Section 63.12 of the authorized for this service Commission's Rules. This Application is eligible for streamlined processing

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

Respectfully Submitted,

QUANTITUDE, INC.

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

By:

Randy Reid

Chief Legal Officer

QUANTITUDE, INC.

5350 South Valentia Way

Englewood, CO 80111

(303) 397-5434

Its Attorneys

Date:

CERTIFICATE

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

- Quantitude is not affiliated with any foreign carrier in any of the countries to which Quantitude proposes to provide service in the foregoing application.
- is Sections 63.21, 63.22, and 63.23 of the Commission's Rules. Quantitude will comply with the terms and conditions contained in
- 4. indirectly from any foreign carrier with respect to any U.S. agreements in the future adversely in the U.S. market and will not enter into such market power on the foreign end of the route to affect competition international route where the foreign carrier possesses sufficient Quantitude has not agreed to accept special concessions directly or
- 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).

Ву: _

Title: Attorney-in-fa

Date: _

16 February 2001