

FCC/MELTON

MAR 16 2001

In the Matter of Application of  
SONERA CORPORATION U.S.  
for authority pursuant  
to Section 214 of the  
Communications Act of 1934,  
as amended, for global authority  
to operate as an international  
facilities-based and resale carrier

Streamlined  
SONERA CORPORATION U.S.

ITC-214-20010316-00155

APPLICATION FOR SECTION 214 AUTHORITY

Sonera Corporation U.S. ("Sonera US") hereby requests authority, pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. Section 214 (1982), and Section 63.18 of the Commission's Rules, 47 C.F.R. Section 63.18, to provide global international facilities-based and resale services between the United States and various international points, as permitted under Sections 63.18 (e)(1) and (2) of the Commission's Rules.

I. BACKGROUND

1. Sonera US is a State of Delaware corporation organized to provide, among other activities, international telecommunications services. Sonera US is a wholly-owned subsidiary of Sonera Corporation, a Finnish limited liability company. Sonera US expects to serve certain customers, including other telecommunications carriers, with international telecommunications services throughout the United States.

2. By granting this application, the Commission will serve the public interest, convenience and necessity by promoting competition in the international services market. Competition will

benefit U.S. users of international telecommunications services by increasing service options and lowering prices. Thus, the public interest will be served by the grant of the requested Section 214 authority to Sonera US.

## II. INFORMATION REQUIRED BY SECTION 63.18 OF THE COMMISSION'S RULES

3. The following information is submitted, as required by Section 63.18 of the Commission's Rules, in support of the Sonera US request for Section 214 authority.

(a) Sonera Corporation US.  
890 Winter Street  
Suite 310  
Waltham, MA 02451  
(781) 839-7100

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

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

Mr. Ralph Kirkpatrick, Director  
Sonera Corporation U.S.  
5219 Baltimore Ave.  
Bethesda, Maryland 20816  
(301) 792-6854

and

Mr. Olli Tuohimaa, General Counsel  
Sonera Corporation U.S.  
2550 M Street, N.W.  
Washington, D.C. 20037  
(202) 466-3270

Paul C. Besozzi, Esq.  
Patton Boggs LLP  
2550 M Street, N.W.  
Washington, D.C. 20037  
(202) 457-5292

(d) Sonera US has not received authority previously under Section 214 of the Communications Act.

(e) Sonera US requests global facilities-based and resale authority pursuant to the terms and conditions of Section 63.18(e)(1) and (e)(2) of the Commission's Rules. Sonera US will

comply with the terms and conditions contained in Sections 63.21 through 63.23 of the Commission's Rules as they relate to such authority.

- (f) At this time, Sonera US seeks no other authorization available under Section 63.18(e).
- (g) Not applicable.
- (h) The names, addresses, citizenship and principal business of the entities which directly or indirectly control ten percent (10%) or more of Sonera US are as follows:

Direct Ownership

- (1) Owner's Name: Sonera Corporation

Address: Teollisuuskatu 15  
P.O. Box 106, 00051 Sonera, Finland  
+ 358 2040 1

Citizenship: Finnish Limited Liability Company

Principal Business: Telecommunications Services Provider

Direct Ownership Interest: 100% of Sonera US

Interlocking Directorates With Applicant: Mr. Airno Olkkonen, a member of the

Board of Directors of Sonera US, is also a Senior Vice President of Sonera Corporation

Indirect Ownership

- (2) Owner's Name: Government of Finland

Address: Ministry of Transport and Communications  
Et eläesplandi 16  
00130 Helsinki  
Finland

Citizenship: Finland

Principal Business: Government of Finland

Indirect Ownership Interest: 52.8% through ownership of Sonera Corporation

- (i) Sonera US is an affiliate of a foreign facilities-based carrier, Sonera Corporation, which provides facilities-based wireline and wireless service in Finland. Sonera Corporation also holds a greater than 25%, but non-controlling, ownership interest (1) in Lattetekom, a facilities-based provider of wireline telecommunications services in Latvia and (2) in Lietuvos Telekomas, which provides similar services in Lithuania. Sonera holds a greater than 25%, but non-controlling, ownership interest (1) in Turkcell, a mobile wireless telecommunications service provider in Turkey and (2) in 3G, which has been selected as the winning bidder for certain licenses to provide third generation mobile wireless telecommunications services in Germany; however, these German licenses are not yet operational.
- (j) Sonera US does seek authority to provide international telecommunications services to Finland, where its parent entity, Sonera Corporation is a foreign carrier.
- (k) Sonera US certifies that Finland is a member of the World Trade Organization. See In re Application of DiGiPH PCS, Inc., DA-00-2757, WTTB/IB, released December 13, 2000, at p. 7 (§15).
- (l) Not applicable.
- (m) Sonera US desires to be regulated as a non-dominant carrier for the provision of international telecommunications services to Finland, Germany and Turkey, each of which is a WTO Member.
- (1) Sonera US notes that the Commission has previously determined that there are no restrictions on foreign investment in telecommunications enterprises in Finland. Telecom Finland, 12 FCC Rcd 17648, 17654 (§117) (IB 1997). The Commission has authorized international simple resale to Finland and the current international settlement rate for Finland (\$.104) is well below the FCC benchmark rate for that country (\$.105).

According to the Finnish Ministry of Transport and Communications, there are some 49 different wireline telecommunications service providers in Finland. According to the Ministry, there are 25 different providers of international network services in Finland, including AT&T, Concert and MCI. The latest available statistics compiled by the Ministry show that Sonera Corporation has only 27.1% of the total fixed telephone subscriber access lines in Finland. According to the Ministry, Sonera Corporation's share of total international call minutes in Finland shrank from 55.7% in 1998 to 51.5% in 1999. The statistics for 2000 are not yet available, but a similar percentage reduction would bring Sonera Corporation's below 50% of total international call minutes in Finland on all routes.

- (2) Sonera Corporation's interests in Germany and Turkey are in wireless mobile carriers. Both of the wireless markets in these countries are competitive. In Turkey there are three GSM operators licensed, with a fourth license awaiting to be awarded. There are some 1700 telecommunications service providers in the German market including wireless carriers. Sonera Corporation's wireless affiliates do not have a 50% percent market share in the international transport and local access markets in those countries. Indeed, in Germany, Sonera Corporation holds only an interest in a non-operating licensee at this point.
- (n) Sonera US certifies that it has not agreed and will not agree in the future to accept any direct or indirect special concessions from any foreign carrier or administration with regards to traffic or revenue flows between the United States and any foreign countries that Sonera is authorized to serve, including Finland.

- (o) Sonera US certifies, pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules. Complimenting the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 3301), that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

- (p) Sonera US desires streamlined processing pursuant to Section 63.12 of the Commission's Rules. Sonera US qualifies for such processing pursuant to Section 63.12(c)(1)(ii) of the Commission's Rules with respect to Finland. Sonera US qualifies for streamlined processing pursuant to Section 63.12(c)(1)(iii) with respect to Germany and Turkey. Sonera US qualifies for such processing with respect to Section 63.12(c)(1)(v) with respect to Latvia and Lithuania.<sup>1</sup>

### III. CONCLUSION

In conclusion, Sonera Corporation US certifies that all of the information in this application is accurate and correct to the best of its knowledge and belief. For these reasons, Sonera Corporation US respectfully request that the Commission grant this application to provide the services requested.

Respectfully submitted,

SONERA CORPORATION U.S.

By: 

Olli Tuohimaa  
Sonera Corporation U.S.  
2550 M Street N.W.  
Washington D.C. 20037  
(202) 466-3270

Date: March 16, 2001

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<sup>1</sup>According to the WTO, Lithuania is currently an Observer Government but has completed negotiations to become a full WTO member and has committed to implement all obligatory WTO agreements without any transaction period. Accession to full WTO Membership is expected by May 1, 2001.



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Washington, D.C. 20037-1350

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PRIVATE BANKING GROUP OFFICE  
WASHINGTON, DC 20006-4658  
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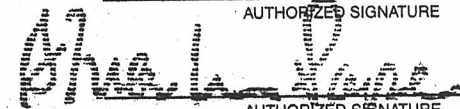

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