



international resale services to its wireless customers under the requested global resale authority.

Cingular, Applicant's controlling parent, has a number of foreign carrier affiliations, as defined under Part 63 of the Commission's Rules, by virtue of SBC's and BellSouth's indirect ownership interests in both Cingular and such foreign carriers.<sup>1</sup> Through SBC's ownership interests, Cingular is affiliated with carriers in South Africa, Switzerland, Norway, the Netherlands, Denmark, Germany, Canada, Lithuania, Belgium, France, the United Kingdom, the Czech Republic, Portugal, Singapore, Spain and Italy. Through BellSouth's ownership interests, Cingular is affiliated with carriers in Argentina, Brazil, Chile, Colombia, Denmark, Ecuador, Guatemala, Israel, Nicaragua, Panama, Peru, Uruguay and Venezuela.

## **II. PUBLIC INTEREST CONSIDERATIONS**

Grant of this application will serve the public interest, convenience and necessity by enabling Applicant to provide its customers with international service through the resale of the international services of authorized U.S. common carriers. Applicant's provision of international services should benefit consumers by increasing competition, lowering prices and increasing the service options available to the public. For these reasons, Applicant respectfully requests that the Commission grant this Application.

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<sup>1</sup> See 47 C.F.R. § 63.09(e).

**III. OTHER INFORMATION PROVIDED PURSUANT TO SECTION 63.18  
OF THE COMMISSION'S RULES**

Applicant provides the following information in compliance with subsections (a) through (p) of Section 63.18 of the Commission's Rules, 47 C.F.R. §§ 63.18(a)-(p), and in support of Applicant's request.

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

**Worcester Telephone Company**  
Susan Winzeler  
17330 Preston Road, Suite 100A  
Dallas, TX 75252  
(972) 733-6103 (voice)  
(972) 733-7029 (facsimile)

(b) Applicant is a New York general partnership.

(c) The name, title, address and telephone number of each officer and other

contact person to whom correspondence concerning this application is to be addressed is as follows:

Carol Tacker  
Vice President, General Counsel & Secretary  
5565 Glenridge Connector, Twelfth Floor  
Atlanta, GA 30342  
(404) 236-6030 (voice)  
(404) 236-6035 (facsimile)

with a copy to:

Susan Winzeler  
17330 Preston Road, Suite 100A  
Dallas, TX 75252  
(972) 733-6103 (voice)  
(972) 733-7029 (facsimile)

Philip Horton  
Arnold & Porter  
555 12th Street, N.W.  
Washington, DC 20004  
(202) 942-5787 (voice)  
(202) 942-5999 (facsimile)

*(d)* Applicant has not previously received authority under Section 214 of the Communications Act, as amended, to provide international telecommunications services.

*(e)* Applicant is applying for global resale authority under Section 63.18(e)(2) of the Commission's Rules. Applicant requests Section 214 authority to operate as a resale carrier pursuant to Section 63.18(e)(2) and certifies that it will comply with the terms and conditions contained in Sections 63.21 and 63.23 of the Commission's Rules.

*(f)* No response required.

*(g)* Not applicable.

*(h)* Applicant is 90.60 percent owned by Cingular, a Delaware limited liability company whose business consists primarily of the provision of wireless services in the United States. Cingular is a joint venture between SBC and BellSouth. SBC owns approximately 60 percent of the LLC units of Cingular, and BellSouth owns approximately 40 percent of the LLC units of Cingular. SBC is a corporation organized under the laws of the State of Delaware. SBC's affiliates provide wireline and wireless voice and data communications, paging, high-speed Internet access and messaging, cable and satellite television, security services and telecommunications equipment, as well as directory advertising and publishing services. No entity or person beneficially owns more than 10 percent of SBC. BellSouth is a corporation organized under the laws of the State of Georgia. BellSouth is a holding company providing telecommunications services, systems and products. No entity or person beneficially owns more than 10 percent of BellSouth.

Applicant hereby certifies that it has no interlocking directorates with a foreign carrier.

The addresses of SBC and BellSouth are as follows:

**SBC Communications Inc.**

175 East Houston Street  
San Antonio, TX 78205

**BellSouth Corporation**

1155 Peachtree St., N.E., Suite 1700  
Atlanta, GA 30309

(i) Applicant hereby certifies that it is affiliated, as that term is defined in

Section 63.09(e) of the Commission's Rules, 47 C.F.R. § 63.09(e), by virtue of the ownership interests of SBC or its other subsidiaries, with the following foreign carriers:

1. Telkom South Africa Ltd. ("Telkom S.A.") (South Africa). A consortium formed between Telekom Malaysia Berhad and SBC owns 30 percent of Telkom S.A. SBC owns 60 percent of the consortium. Before the acquisition by this consortium, Telkom S.A. was a completely state-owned company. South Africa is a Member of the World Trade Organization. Telkom S.A. is the incumbent telecommunications carrier in South Africa.

2. diAx Holding AG ("diAx") (Switzerland). SBC, through a joint venture, owns an indirect 40 percent interest in diAx, a relatively new, full-service Swiss telecommunications carrier, with far less than 50 percent market share in the international transport and local access markets in Switzerland. Switzerland is a Member of the World Trade Organization. In the Commission decision approving the merger of SBC and Ameritech Corporation ("Ameritech"),<sup>2</sup> the Commission determined that diAx lacks market power in Switzerland, and that SBC and its subsidiaries are entitled to non-dominant carrier treatment on the U.S.-Switzerland route.<sup>3</sup>

3. Sunrise Communications A.G. ("Sunrise") (Switzerland). Through its interest in Tele Danmark, SBC holds an indirect 43.9 percent non-controlling interest in Sunrise. Switzerland is a Member of the World Trade Organization. Sunrise provides competitive fixed voice, data, and Internet

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<sup>2</sup> In re Applications of Ameritech Corp. and SBC Communications Inc., Memorandum Opinion and Order, 14 FCC Rcd. 14712 (1999) ("SBC/Ameritech Order"), vacated on other grounds, Ass'n of Communications Enters. v. FCC, No. 99-1441, 2001 WL 20519 (D.C. Cir. Jan. 9, 2001).

<sup>3</sup> SBC/Ameritech Order ¶ 533.

services in Switzerland and has far less than 50 percent market share in the international transport and local access markets in Switzerland.

4. BEN Netherlands B.V. (“BEN Netherlands”) (the Netherlands). Through its interests in Tele Danmark and Belgacom S.A., Ameritech owns an indirect, non-controlling interest in BEN Netherlands. The Netherlands is a Member of the World Trade Organization. BEN Netherlands provides GSM 1800 wireless services in the Netherlands, and has far less than a 50 percent market share in the international transport and local access markets in the Netherlands. In the SBC/Ameritech Order, the Commission held that BEN Netherlands does not possess market power in the Netherlands, and that SBC subsidiaries are entitled to non-dominant regulation on the U.S.-Netherlands route.<sup>4</sup>

5. Tele Danmark A/S (“Tele Danmark”) (Denmark). Ameritech holds, through an indirect subsidiary, a 41.6 percent, *de facto* controlling interest in Tele Danmark. Denmark is a Member of the World Trade Organization. Tele Danmark is a full service telecommunications carrier in Denmark authorized to provide, among other services, local exchange and international telecommunications services to the public.

6. Belgacom S.A. (“Belgacom”) (Belgium). SBC, through its subsidiary Ameritech, indirectly has an affiliation with Belgacom.<sup>5</sup> Belgium is a Member of the World Trade Organization. Belgacom is the incumbent telecommunications carrier in Belgium.

7. Talkline GmbH (“Talkline”) (Germany and the Netherlands). Talkline is wholly-owned by Tele Danmark. Consequently, Ameritech holds an indirect controlling interest in Talkline. Talkline is authorized to provide mobile communications services in Germany and resold cellular service in the Netherlands. Germany and the Netherlands are Members of the World Trade Organization. Talkline has far less than a 50 percent market share of the international transport and local access markets in Germany and the Netherlands. In the SBC/Ameritech Order, the Commission held that Talkline lacks market power in Germany and the Netherlands,<sup>6</sup> and that SBC subsidiaries are entitled to regulation as non-dominant carriers along the U.S.-Germany and U.S.-Netherlands routes.<sup>6</sup>

8. UAB Mobilios Telekomunikacijos (“Bite”) (Lithuania). Bite is a wholly-owned subsidiary of Tele Danmark. Consequently, Ameritech holds an

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<sup>4</sup> Id. ¶ 537.

<sup>5</sup> In re Application of Southwestern Bell Communications Servs., Inc., Order, Authorization and Certificate, 15 FCC Red. 11718 ¶ 21 (IB, Telecomm. Div 1999).

<sup>6</sup> Id.

indirect, controlling interest in Bite. Lithuania is a Member of the World Trade Organization. Bite is authorized to provide wireless services in Lithuania, and has far less than a 50 percent market share in the international transport and local access markets in Lithuania. In the SBC/Ameritech Order, the Commission held that Bite lacks market power in Lithuania, and that SBC subsidiaries are entitled to regulation as non-dominant carriers on the U.S.-Lithuania route.<sup>7</sup>

9. Ameritech Communications International, Inc. ("ACII") (Canada). ACII is an indirect, wholly owned subsidiary of Ameritech. As a consequence, SBC holds a controlling interest in ACII. ACII is a foreign carrier, as that term is defined in Section 63.09(d). Canada is a Member of the World Trade Organization. ACII has a minuscule share of the international transport and local access market in Canada. On June 30, 1999, Ameritech Communications, Inc. ("ACI") and Ameritech Mobile Communications, Inc. ("AMCI") (subsidiaries of SBC) notified the Commission that: (1) ACII (a wholly-owned subsidiary of Ameritech Communications, Inc.) had become a foreign carrier in Canada, (2) ACII lacks market power in Canada, and (3) ACI and AMCI therefore are entitled to non-dominant treatment along the U.S.-Canada route.<sup>8</sup> The Commission apparently agrees that ACII lacks market power in Canada because the Commission has not imposed dominant carrier status on ACI and AMCI along the U.S.-Canada route.<sup>9</sup>

10. EITTele Ost ("ETO") (Norway). Tele Danmark owns a 51 percent interest in ETO, which provides competitive fixed network, broadband and Internet services in Norway. Norway is a Member of the World Trade Organization. ETO currently serves a minuscule share of the Norwegian market.

11. Belgacom France (France). SBC, through its subsidiary Ameritech, indirectly has an affiliation with Belgacom. Through the indirect 34 percent interest in Belgacom, Ameritech holds an indirect 34 percent interest in Belgacom France, a wholly owned subsidiary of Belgacom. France is a Member of the World Trade Organization. Belgacom France provides competitive fixed voice, data and Internet services in France and has far less than 50 percent market share in the international transport and local access markets in France.

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<sup>7</sup> Id. ¶ 538.

<sup>8</sup> Ameritech Communications, Inc. Certification of Status of its Affiliate, Ameritech Communications Int'l, Inc. as a Foreign Carrier in Canada, FCC File Nos. ITC-96-441, ITC-96-272, ITC-97-298 (filed June 30, 1999); Ameritech Mobile Communications, Inc. Certification of Status of its Affiliate, Ameritech Communications Int'l, Inc. as a Foreign Carrier in Canada, FCC File No. ITC-96-243 (filed June 30, 1999).

<sup>9</sup> Foreign Participation Order, 12 FCC Rcd. 23891 ¶¶ 161-162 (1997).

12. Contactel, s.r.o. (“Contactel”) (Czech Republic). Through its interests in Tele Danmark and Ceske Radiokomunikace (“Ceske”) (Tele Danmark holds a 20.8 percent non-controlling interest in Ceske), SBC holds an indirect 60.4 percent controlling interest in Contactel, a provider of competitive data and Internet services in the Czech Republic. The Czech Republic is a Member of the World Trade Organization. Contactel lacks 50 percent market share in the international transport and local access markets in the country. In particular, Tele Danmark holds directly a 50 percent joint controlling interest in Contactel. Ceske holds the other 50 percent joint controlling interest in Contactel. With Tele Danmark’s 20.8 percent non-controlling equity interest in Contactel, Tele Danmark has an additional indirect 10.4 percent equity interest in Contactel, for a combined 60.4 percent joint controlling interest in Contactel.

13. Belgacom U.K. Limited (“Belgacom U.K.”) (United Kingdom). Through its interest in Belgacom, SBC holds an indirect 34 percent interest in Belgacom U.K. The U.K. is a Member of the World Trade Organization. Belgacom U.K. offers competitive telecommunications services in the United Kingdom and has far less than 50 percent market share in the international transport and local access markets in the country.

14. Belgacom Deutschland GmbH (“BDG”) (Germany). Through its interest in Belgacom, SBC holds an indirect 34 percent interest in BDG. Germany is a Member of the World Trade Organization. BDG offers competitive telecommunications services in Germany and has far less than 50 percent market share in the international transport and local access markets in the country.

15. Belgacom Nederland B.V. (“BN”) (the Netherlands). Through its interest in Belgacom, SBC holds an indirect 34 percent interest in BN. The Netherlands is a Member of the World Trade Organization. BN offers competitive telecommunications services in the Netherlands and has far less than 50 percent market share in the international transport and local access markets in the country.

16. Belgacom S.A. (“Belgacom”) (Switzerland). SBC, through its subsidiary Ameritech, indirectly has an affiliation with Belgacom. On February 28, 2001, Belgacom filed a request for operational authority in Switzerland, from the Swiss Office Federal de la Communication (“OFCOM”); that request was granted March 5, 2001. Under this authorization, Belgacom will provide wholesale international voice services and retail data transmission services. Belgacom plans to create a separate Swiss subsidiary, based in Zurich, to which Belgacom will transfer the authorization. Switzerland is a Member of the World Trade Organization. Belgacom is a new market entrant in



Switzerland and does not have, and is not affiliated with any carrier that has, market power in the country.

17. Belgacom Portugal S.A. (“Belgacom Portugal”) (Portugal). On November 24, 2000, Belgacom created a Portuguese subsidiary, Belgacom Portugal S.A., which is headquartered in Lisbon. Belgacom Portugal is wholly owned (minus four individual shares) by Belgacom. Through its interest in Belgacom, SBC holds an indirect 34 percent interest in Belgacom Portugal. On January 12, 2001, Belgacom Portugal filed a request with the Portuguese Institute of Communications (“ICP”) seeking a license to transport international voice traffic. That application remains pending. On January 12, 2001, Belgacom Portugal also filed a declaration to provide data services, which is the only requirement for providing such services in Portugal. Belgacom Portugal thus is, or will be, considered a foreign carrier under the Commission’s rules. Portugal is a member of the World Trade Organization. Belgacom Portugal is a new market entrant in Portugal and does not have, and is not affiliated with any carrier that has, market power in the country.

18. Belgacom Asia Pte Ltd. (“BAPL”) (Singapore). Belgacom formed a wholly owned subsidiary, Belgacom Asia Pte Ltd. (“BAPL”) on September 1, 2000. Through its interest in Belgacom, SBC holds an indirect 34 percent interest in BAPL. BAPL is incorporated under Singapore law. On February 14, 2001, the company filed an application for a “facility-based operator” license. That license was granted on March 16, 2001, by Singapore’s Infocomm Development Authority (“IDA”), and BAPL is in the process of establishing a point of presence in Singapore. BAPL intends to offer two services: (1) transport of international voice traffic between operators, and (2) data transmission services. Singapore is a Member of the World Trade Organization. BAPL is a new market entrant in Singapore and does not have, and is not affiliated with any carrier that has, market power in the country.

19. Belgacom S.A. (“Belgacom”) (Spain). SBC, through its subsidiary Ameritech, indirectly has an affiliation with Belgacom. Belgacom has established a point of presence in Spain, where it intends to establish a separate, wholly owned subsidiary to offer selected services, including the transport of international voice traffic on wholesale basis, and the provision of data services. Belgacom commenced business activities on November 2, 2000, the date it received regulatory approval in Spain for the provision of data transmission services.<sup>10</sup> Moreover, Belgacom was informed by Spanish regulatory authorities that it did not require a specific authorization to transport international voice traffic on a wholesale basis and could begin

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<sup>10</sup> Belgacom received a “General Authorization Type C” to offer data services in Spain.

doing so immediately.<sup>11</sup> Spain is a Member of the World Trade Organization. Belgacom is a new market entrant in Spain and does not have, and is not affiliated with any carrier that has, market power in the country.

20. Belgacom S.A. (“Belgacom”) (Italy). SBC, through its subsidiary Ameritech, indirectly has an affiliation with Belgacom. Belgacom has established a point of presence in Italy, where it plans to establish a separate, wholly owned subsidiary to offer selected services, including the transport of international voice traffic on wholesale basis, and the provision of data services. On January 29, 2001, Belgacom filed with Italian regulatory authorities two documents: (1) an application for a license to operate as a wholesale “carrier’s carrier,” and (2) a declaration that it will provide retail data transmission services in Italy. Italy is a Member of the World Trade Organization. Belgacom is a new market entrant in Italy and does not have, and is not affiliated with any carrier that has, market power in the country.

In addition, Applicant hereby certifies that it is affiliated, as that term is defined in Section 63.09(e) of the Commission’s Rules, 47 C.F.R. § 63.09(e), by virtue of the ownership interests of BellSouth or its other subsidiaries, with the following foreign carriers:

1. Abiatar, S.A. (Uruguay). BellSouth indirectly holds a 46 percent interest in Abiatar, S.A., which provides mobile wireless services in the capital of Montevideo and the coastal region in the country. Uruguay is a Member of the World Trade Organization. Abiatar, S.A. has far less than a 50 percent market share in the international transport and local access markets in the country.
2. BCP, S.A. and BSE, S.A. (Brazil). BellSouth indirectly holds a 44.5 percent interest in BCP, which provides mobile wireless service in Sao Paulo. BellSouth indirectly holds a 46.8 percent interest in BSE, S.A., which provides mobile wireless services in a six-state region in northeastern Brazil. Brazil is a Member of the World Trade Organization. Each entity has far less than a 50 percent market share in the international transport and local access markets in the country.

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<sup>11</sup> Belgacom has a fiscal identification number and is legally domiciled in Spain in its own name.

3. BellSouth Chile S.A. and BellSouth Comunicaciones S.A. (Chile). BellSouth indirectly holds a 100 percent interest in each of these entities that provide long distance and mobile wireless services in the country, respectively. Chile is a Member of the World Trade Organization. Each entity has far less than a 50 percent market share in the international transport and local access markets in the country.
4. BSC de Panama, S.A. (Panama). BellSouth indirectly holds a 43.7 percent interest in BSC de Panama, S.A., which provides mobile wireless services in the country. Panama is a Member of the World Trade Organization. BSC de Panama, S.A. has far less than a 50 percent market share in the international transport and local access markets in the country.
5. CellCom Israel Ltd. (Israel). BellSouth indirectly holds a 34.75 percent interest in CellCom Israel Ltd., which provides mobile wireless services in the country. Israel is a Member of the World Trade Organization. CellCom Israel Ltd. has far less than a 50 percent market share in the international transport and local access markets in the country.
6. Compania de Radiocomunicaciones Moviles S.A. ("Movicom") (Argentina). BellSouth indirectly holds a 65 percent ownership interest in Movicom, which provides primarily mobile wireless services in Argentina, but in 1999 received authority to provide local and long distance services in the country. Argentina is a Member of the World Trade Organization. Movicom has far less than a 50 percent market share in the international transport and local access markets in the country.
7. Dansk MobilTelefon I/S d/b/a SONOFON (Denmark). BellSouth indirectly holds a 46.5 percent ownership interest in SONOFON, which provides mobile wireless services in the country. Denmark is a Member of the World Trade Organization. SONOFON has far less than a 50 percent market share in the international transport and local access markets in the country.
8. Otecel S.A. (Ecuador). BellSouth holds an 89.4 percent indirect ownership interest in Otecel S.A., which provides mobile wireless services in the country. Ecuador is a Member of the World Trade Organization. Otecel S.A. has far less than a 50 percent market share in the international transport and local access markets in the country.
9. Telcel, C.A. (Venezuela). BellSouth holds a 78 percent indirect ownership interest in Telcel, C.A., which provides mobile wireless services in the country. Venezuela is a Member of the World Trade Organization. Telcel, C.A. has far less than a 50 percent market share in the international transport and local access markets in the country.

10. Telefonia Celular de Nicaragua, S.A. ("Telefonia CN") (Nicaragua). BellSouth holds an 89 percent indirect ownership interest in Telefonia CN, which provides mobile wireless services in the country. Nicaragua is a Member of the World Trade Organization. Telefonia CN has far less than a 50 percent market share in the international transport and local access markets in the country.

11. BellSouth Peru, S.A. (Peru). BellSouth holds a 97 percent indirect ownership interest in BellSouth Peru, S.A., which provides mobile wireless services in the country. Peru is a Member of the World Trade Organization. BellSouth Peru, S.A. has far less than a 50 percent market share in the international transport and local access markets in the country.

12. BellSouth Guatemala y Compania S.C.A. (Guatemala). BellSouth holds a 60 percent indirect interest in BellSouth Guatemala y Compania, S.C.A., which provides mobile wireless service in the country. It is authorized to provide other domestic and international services in the country, but will initially provide only mobile wireless services. Guatemala is a Member of the World Trade Organization. BellSouth Guatemala y Compania, S.C.A. has no market share in the international transport and local markets in the country.

13. Celumovil S.A. ("Celumovil") and Compania Celular de Colombia Cocolco S.A. ("Cocolco") (Colombia). BellSouth holds an indirect 66 percent interest in Celumovil and Celumovil's 100 percent interest in Cocolco. Celumovil and Cocolco are authorized to provide cellular wireless telecommunications and other telecommunications services in Colombia. Celumovil provides cellular service in the Eastern and Atlantic regions of the country and Cocolco provides cellular service in the Western region of the country. Colombia is a Member of the World Trade Organization. Each entity has far less than a 50 percent market share in the international transport and local access markets in the country.

Applicant hereby certifies that it is not a foreign carrier in any country.

(j) Pursuant to Section 63.18(j) of the Commission's rules, 47 C.F.R.

§ 63.18(j), Applicant hereby certifies that it does not seek to provide international telecommunications services to any destination country in which Applicant is a foreign carrier or controls a foreign carrier.

Applicant further certifies that it seeks to serve certain destination countries in which SBC and BellSouth, entities that own greater than 25 percent of Cingular,

Applicant's controlling parent, control foreign carriers. These destination countries and foreign carriers are:

1. Denmark (Tele Danmark);
2. Germany (Talkline);
3. Netherlands (Talkline);
4. Lithuania (Bite);
5. Canada (ACID);
6. Norway (ETO);
7. Czech Republic (Contactel);
8. Chile (BellSouth Chile S.A. and BellSouth Comunicaciones S.A.);
9. Argentina (Movicom);
10. Ecuador (Otecel, S.A.);
11. Venezuela (Telcel, C.A.);
12. Nicaragua (Telefonia CN);
13. Peru (BellSouth Peru, S.A.);
14. Guatemala (BellSouth Guatemala y Compania S.C.A.); and
15. Colombia (Celumovil and Cocelco).

*(k)* Pursuant to Section 63.18(k) of the Commission's rules, 47 C.F.R. § 63.18(k), Applicant hereby certifies that each of the destination countries listed in subsection (j) of this application is a Member of the World Trade Organization. In addition, each of the affiliated foreign carriers in these destination countries lack market power in the named foreign country, except Denmark.

*(l)* Applicant proposes to resell the international switched services of unaffiliated U.S. carriers for the purpose of providing global international communications services. In South Africa, Switzerland, Norway, the Netherlands, Denmark, Germany, Canada, Lithuania, Belgium, France, the United Kingdom, the Czech Republic, Portugal, Singapore, Spain, Italy, Argentina, Brazil, Chile, Colombia, Ecuador, Guatemala, Israel, Nicaragua, Panama, Peru, Uruguay, and Venezuela, Applicant has a foreign affiliation as defined by Section 63.09(e) of the Commission's Rules. 47 C.F.R. § 63.09(e). Pursuant to Section 63.18(l) of those Rules, 47 C.F.R. § 63.18(l), Applicant provides the following information with respect to the foreign carriers with which it has an affiliation and as to which it either satisfies Section 63.10(a)(3) of the Commission's Rules, 47 C.F.R. § 63.10(a)(3), or will file the quarterly traffic reports required by Section 43.61(c) of the Commission's Rules, 47 C.F.R. § 43.61(c).

On all international routes, Applicant will provide service solely via resale of the international switched services of an unaffiliated U.S. carrier. Since all of Applicant's foreign affiliated carriers, except Telkom S.A., Tele Danmark, and Belgacom, lack 50 percent market share in the international transport and the local access markets on the foreign end of the route, Applicant satisfies Section 63.10(a)(3) of the Rules and is presumptively non-dominant for all international routes covered by this application, other than those to South Africa, Denmark, and Belgium. With respect to those three countries, Applicant will file the quarterly traffic reports required by Section 43.61(c) of the Rules.

*(m)* Pursuant to Section 63.18(m) of the Commission's Rules, 47 C.F.R. § 63.18(m), and in accordance with the standards set forth in Section 63.10 of those Rules, 47 C.F.R. § 63.10, Applicant hereby requests that it be treated as non-dominant for the provision of the international communications services to South Africa, Switzerland, Norway, the Netherlands, Denmark, Germany, Canada, Lithuania, Belgium, France, the United Kingdom, the Czech Republic, Portugal, Singapore, Spain, Italy, Argentina, Brazil, Chile, Colombia, Ecuador, Guatemala, Israel, Nicaragua, Panama, Peru, Uruguay, and Venezuela. The Commission has already determined that Cingular is entitled to non-dominant treatment on all international routes<sup>12</sup> and Applicant has no foreign carrier affiliations of its own which would alter this determination.

In addition, because Applicant will provide service solely via resale of the international switched services of an unaffiliated U.S. carrier on all its international routes, Applicant will satisfy Section 63.10(a)(4) of the Rules and is presumptively non-dominant for all international routes covered by this application. Finally, because all of Applicant's foreign affiliated carriers, except Telkom S.A., Tele Danmark, and Belgacom, lack 50 percent market share in the international transport and the local access markets on the foreign end of the route, Applicant will satisfy Section 63.10(a)(3)

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<sup>12</sup> See In re Applications of SBC Communications Inc. and BellSouth Corp., WT Docket No. 00-81, Memorandum Opinion and Order, DA 00-2223 ¶¶ 37-45 (WTB/IB rel. Sept. 29, 2000) (Pacific Telesis Mobile Systems, a Cingular-controlled licensee, did accept dominant carrier regulatory treatment only with respect to the minimal amount of roaming traffic carried by affiliated foreign carriers on routes between the United States and Denmark, South Africa, Belgium, and Hungary).

of the Rules and is presumptively non-dominant for all international routes covered by this application, other than those to South Africa, Denmark, and Belgium.

(*n*) Applicant hereby 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 market power on the foreign end of the route and will not enter into such agreements in the future.

(*o*) Applicant is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. Attached hereto is Applicant's certification, pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-1.2003, (implementing the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862), of Applicant.

(*p*) Applicant requests streamlined processing of this application. This application qualifies for streamlined processing pursuant to Section 63.12 of the Commission's Rules, 47 C.F.R. § 63.12, because, although Applicant is affiliated with foreign carriers within the meaning of Section 63.09(e), 47 C.F.R. § 63.09(e), in South Africa, Switzerland, Norway, the Netherlands, Denmark, Canada, Lithuania, Germany, Belgium, France, the United Kingdom, the Czech Republic, Portugal, Singapore, Spain, Italy, Argentina, Brazil, Chile, Colombia, Ecuador, Guatemala, Israel, Nicaragua, Panama, Peru, Uruguay and Venezuela, these affiliated destination markets are World Trade Organization member countries, and Applicant qualifies for a presumption of non-dominance under Section 63.10(a)(4) of the Commission's Rules, 47 C.F.R. § 63.10(a)(4), as the international service which is the subject of this application would be provided solely through the resale of an unaffiliated U.S. facilities-based carrier's



international switched services (either directly or indirectly through resale of another U.S. resale carrier's international switched services).<sup>13</sup>

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<sup>13</sup> Moreover, foreign carriers in the following countries are mobile wireless carriers: The Netherlands, Denmark (Dansk MobilTelefon), Germany, Lithuania, Uruguay, Brazil, Chile, Panama, Israel, Argentina, Ecuador, Venezuela, Nicaragua, Peru, Guatemala, and Colombia. See 47 C.F.R. § 63.12(c)(1)(iii). In addition, applicants with the same controlling ownership as Applicant have already obtained the authority requested herein. See supra n. 12.

I. CONCLUSION

In view of the foregoing, Applicant respectfully requests that the Commission grant this application.

Respectfully submitted,

WORCESTER TELEPHONE COMPANY

By: 

Carol E. Tacker

Vice President, General Counsel & Secretary of a partner


DATE: April 9, 2001

**CERTIFICATION PURSUANT TO  
SECTIONS 1.2001-1.2003 OF THE COMMISSION'S RULES**

Pursuant to Sections 1.2001-1.2003 of the Commission's Rules, 47 C.F.R.

§§ 1.2001-1.2003, Worcester Telephone Company hereby certifies that neither it, nor any of its officers or directors, nor any of the shareholders holding 5 percent or more of the outstanding stock or shares (voting and/or non-voting) of Worcester Telephone Company is subject to a denial of federal benefits that include FCC benefits pursuant to Section 5301 of the Federal Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

WORCESTER TELEPHONE COMPANY

By:   
Carol L. Tacker  
Vice President, General Counsel & Secretary of a partner

DATE: April 9, 2001