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Telecom Division  
International Bureau

MILLER  
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VISION LINK, INC.

ITC-214-20010427-00253

REGULATORY CONSU

STACEY A. KLINZMAN

7901 SKANSIE A  
SUITE 24C  
GIG HARBOR, WA 98003  
TELEPHONE: 253.851.6700  
FACSIMILE: 253.851.6474  
HTTP://WWW.MILLERSAR.COM

VIA OVERNIGHT DELIVERY  
26 April 2001

Ms. Margalite R. Salas, Esq.  
Secretary, Federal Communications Commission  
445 12<sup>th</sup> Street S.W., Room TWD 204  
Washington, D.C. 20554

Re: Vision Link, Inc. - Section 214 Application

Dear Ms. Salas:

Enclosed are an original and five (5) copies of Vision Link, Inc.'s Application for Global Facilities-Based Authority, Switched Service Resale and Private Line Resale Authority ("Application") filed pursuant to §214 of the Communications Act of 1934, as amended, 47 U.S.C. §214, and §63.18 of the Rules of the Federal Communications Commission ("FCC"), 47 C.F.R. §63.18.

Also enclosed is a completed Fee Processing Form, FCC Form 159, and check made payable to the FCC in the amount of \$315.00 to cover the cost of filing this Application. This filing has been delivered via overnight delivery to the Federal Communications Commission c/o the Mellon Bank, Three Mellon Bank Center, 525 William Penn Way, 27<sup>th</sup> Floor, Room 153-2713, Pittsburgh, PA 15259-0001, Attention: wholesale Lockbox Shift Supervisor. A separate copy of the Application for the International Bureau is enclosed.

Please acknowledge receipt of this filing by file-stamping the additional copy of this letter and returning it in the self-addressed postage paid envelope provided for this purpose.

Questions regarding this filing may be directed to me.

Sincerely,  
Miller Isar, Inc.

  
Stacey A. Klinzman  
Senior Regulatory Consultant

cc: Chief, International Facilities Division, International Bureau - Telecommunications  
Mr. Michael A. Cunningham, Vision Link, Inc.

READ INSTRUCTIONS CAREFULLY  
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION  
REMITTANCE ADVICE

Approved by OMB  
3060-0589  
Page No.    of   

(1) LOCKBOX #358115

SPECIAL USE  
FCC USE ONLY

SECTION A - PAYER INFORMATION

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card)

MILLER ITSKAR INC

(3) TOTAL AMOUNT PAID (U.S. Dollars and cents)  
815,000

(4) STREET ADDRESS LINE NO. 1  
7901 SKANSIE AVE

(5) STREET ADDRESS LINE NO. 2  
SUTTE BLD

(6) CITY  
GIR HARBOR

(7) STATE  
WA

(9) DAYTIME TELEPHONE NUMBER (include area code)  
2538516700

(10) COUNTRY CODE (if not in U.S.A.)

FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED

(11) PAYER (FRN)  
0004362570

(12) PAYER (TIN)  
911626046

IF PAYER NAME AND THE APPLICANT NAME ARE DIFFERENT, COMPLETE SECTION B  
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C)

(13) APPLICANT NAME  
VISION LINK INC

(14) STREET ADDRESS LINE NO. 1  
1432 SOUTH STREET

(15) STREET ADDRESS LINE NO. 2  
S102

(16) CITY  
PERKINS

(17) STATE  
CA

(19) DAYTIME TELEPHONE NUMBER (include area code)  
5622437018

(20) COUNTRY CODE (if not in U.S.A.)

FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED

(21) APPLICANT (FRN)  
0004362497

(22) APPLICANT (TIN)  
330880515

COMPLETE SECTION C FOR EACH SERVICE. IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET

(23A) CALL SIGN/OTHER ID

(24A) PAYMENT TYPE CODE  
CUT

(25A) QUANTITY

(26A) FEE DUE FOR (PTC)  
815,000

(27A) TOTAL FEE  
815,000

FCC USE ONLY

(28A) FCC CODE 1

(29A) FCC CODE 2

(23B) CALL SIGN/OTHER ID

(24B) PAYMENT TYPE CODE

(25B) QUANTITY

(26B) FEE DUE FOR (PTC)

(27B) TOTAL FEE

FCC USE ONLY

(28B) FCC CODE 1

(29B) FCC CODE 2

SECTION D - CERTIFICATION

(30) CERTIFICATION STATEMENT  
I, STACEYA RINZMAN

certify under penalty of perjury that the foregoing and supporting information is true and correct to the best of my knowledge, information and belief.

SIGNATURE

*Stacey Rinzman*

DATE 4/26/01

SECTION E - CREDIT CARD PAYMENT INFORMATION

(31)

MASTERCARD

MASTERCARD/VISA ACCOUNT NUMBER:

EXPIRATION

VISA

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

SIGNATURE

DATE

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.

In the Matter of )  
 )  
Vision Link, Inc. )

Application Pursuant to Section 214 of the )  
Communications Act of 1934, as amended, for )  
Global Authority to Acquire and Operate )  
Facilities of Authorized U.S. Carriers and to )  
Resell Switched and Private-line Services of )  
Authorized U.S. Carriers for the Provision of )  
International Service to all Permissible )  
International Points )  
 )  
 )  
 )

File No. \_\_\_\_\_

APPLICATION FOR SECTION 214 CERTIFICATION

Vision Link, Inc. ("Applicant" or "Vision Link"), pursuant to Section 214 of the Communications Act of 1934, as amended, ("the Act"), 47 U.S.C. § 214 and § 63.18 *et seq.* of the rules and regulations of the Federal Communications Commission ("Commission"), hereby requests authority to acquire and/or operate facilities of other U.S. common carriers and non-common carriers previously and subsequently authorized by the Commission, including any necessary foreign connecting facilities, for the purpose of providing telecommunications services between the United States and all foreign points permitted by the Commission. Applicant further requests authority to resell the international switched services and private-line services of authorized U.S. common carriers for the provision of international service to all permissible international points deemed by the Commission to afford equivalent resale opportunities to U.S. carriers. Applicant will operate the facilities it acquires and resells only in accordance with the Commission's rules and regulations applicable thereto, particularly §§ 63.18(e)(1) and (2).

Pursuant to § 63.18 of the Commission's rules, 47 C.F.R. § 63.18, Applicant submits the following information in support of its Application for authority:

1. § 63.18(a). The name, address, telephone number and facsimile number of the Applicant are:

Vision Link, Inc.  
11432 South Street, S-102  
Cerritos, California 90703

Telephone: 562.243.7018  
Facsimile: 714.521.9177

2. § 63.18(b). The Applicant was organized under the laws of the State of California on November 12, 1999.

3. § 63.18(c). Correspondence concerning this Application should be addressed to:

Andrew O. Isar  
Miller Isar, Inc.  
3220 Uddenberg Lane, Suite 4  
Gig Harbor, Washington 98335

Telephone: 253.851.6700  
Facsimile: 253.851.6474

and

Michael A. Cunningham  
Vision Link, Inc.  
11432 South Street, S-102  
Cerritos, California 90703

Telephone: 562.243.7018  
Facsimile: 714.521.9177

4. § 63.18(d). The Applicant has not previously received authority under Section 214 of the Act.
5. § 63.18(e)(1) through (5). Applicant requests authority to operate as a facilities-based international carrier, pursuant to Section 214 of the Act and the Commission's Foreign Carrier Entry Order<sup>1</sup>. The Applicant would acquire and operate international facilities for the provision of international switched service to those countries found by the Commission to provide equivalent opportunities to obtain facilities. It will operate those facilities in accordance with the terms and conditions of §§ 63.18(e)(1) and 63.21 of the Commission's rules, as well as any other applicable rules and regulations of the Commission. Applicant further requests authority pursuant to Section 214 of the Act to resell the international switched and private-line services of authorized U.S. common carriers for the provision of international switched and basic private-line services to all permissible international points deemed by the Commission to afford equivalent resale opportunities to U.S. carriers.
6. § 63.18(f) and (k). This Application is subject to the Commission's streamlined processing rules. The Applicant is a non-dominant carrier which qualifies for non-dominant regulation pursuant to 47 C.F.R. § 63.12, as it is not affiliated with a foreign carrier within the meaning of § 63.18(h)(1)(i) in a destination market for its facilities-based or resold

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<sup>1</sup> In the Matter of Market Entry and Regulation of Foreign-Affiliated Entities ("Report and Order"), IB Docket No. 95-22, FCC 95-475, 11 FCC Rcd. 3873 (1995).

services as set forth below. Furthermore, Applicant is not affiliated with any U.S. carriers whose facilities-based services it proposes to resell.

7. § 63.18(g). Not applicable.

8. § 63.18(h)(1) and (3). By its executed certification attached hereto, Applicant certifies that it has no affiliation with foreign carriers, as defined in §§ 63.18(h)(1)(i) and (ii) of the Commission's Rules nor any affiliation with any U.S. carriers whose facilities-based services it proposes to resell.

9. § 63.18(h)(2). Applicant's ownership is as follows:

Name: Michael A. Cunningham  
Address: Vision Link, Inc.  
11432 South Street, S-102  
Cerritos, California 90703

Telephone: 562.243.7018  
Facsimile: 714.521.9177

Ownership: Full (100%)  
(a citizen of the United States)

10. § 63.18(i). By its executed certification attached hereto, Applicant certifies that it has not accepted, nor will it agree to accept, special concessions directly or indirectly from any foreign carrier or administration with respect to traffic or revenue flows between the U.S. and any foreign country that Applicant may serve under the authority granted pursuant to this Application.

11. § 63.18(f). Pursuant to 47 C.F.R. §§ 1.2001 through 1.2003, by its executed certification attached hereto, Applicant certifies that no party to the Application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act on 1988, 21 U.S.C. § 853a.
12. Applicant will comply with the accuracy requirements of this section if authorized to provide international communications service.
13. As demonstrated herein, Applicant is legally and technically qualified to provide the services for which it requests authority. For the reasons stated above, Applicant submits that the public interest, convenience and necessity would be furthered by a grant of this Section 214 Application.

WHEREFORE, Vision Link, Inc. respectfully requests that the Commission issue the requested Section 214 authorization for the purpose of providing global facilities-based telecommunications services and resold international switched and private-line services of authorized U.S. common carriers for the provision of international service to all permissible international points deemed by the Commission to afford equivalent resale opportunities to U.S. carriers.

Respectfully submitted, this 23 day of April 2001

Vision Link, Inc.

By: 

Michael A. Cunningham  
Vision Link, Inc.  
11432 South Street, S-102  
Cerritos, California 90703

Telephone: 562.243.7018  
Facsimile: 714.521.9177

Miller Isar, Inc.  
3220 Uddenberg Lane, Suite 4  
Gig Harbor, Washington 98335

Telephone: 253.851.6700  
Facsimile: 253.851.6474

Applicant's Regulatory Consultants



CERTIFICATION OF APPLICANT

I hereby certify that the statements in the foregoing Application for Section 214 authority are true, complete and correct to the best of my knowledge, information and belief and are made in good faith. I hereby certify that Vision Link, Inc. ("Vision Link") is not affiliated with any foreign carrier and is not affiliated with any facilities-based carrier whose services Vision Link intends to resell. I hereby certify that Vision Link will not accept special concessions directly or indirectly from any foreign carrier or administration with respect to traffic or revenue flows between the U.S. and any foreign country which Vision Link may serve under the authority granted under this part. I also hereby certify that no party to the foregoing Application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act on 1988, 21 U.S.C. § 853a.

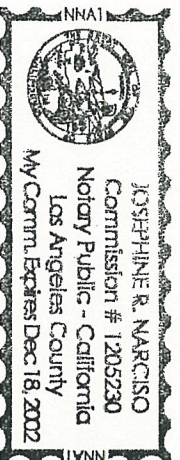
Dated this 23 day of April 2001.

Vision Link, Inc.

By: 

Michael A. Cunningham  
Vision Link, Inc.  
11432 South Street, S-102  
Cerritos, California 90703

Telephone: 562.243.7018  
Facsimile: 714.521.9177



Subscribed and sworn to before me this 23 day of April 2001

Josephine R. Narciso

Printed Name: JOSEPHINE R. NARCISO

Notary Public in and for the State of California

Residing at 678 S. FORDWAY CIR. ANAHEIM CA 92807

My commission expires: DECEMBER 18, 2002