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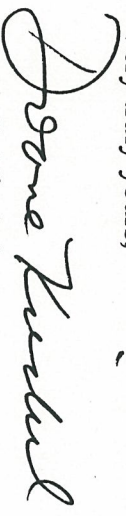
Re: Western Wireless Corporation
Section 214 Application for Global International Authority to Operate as
a Facilities-based and Resale Carrier

To Whom It May Concern:

On behalf of Western Wireless Corporation ("Western") and pursuant to Section 63.20 of the Commission's Rules, we are enclosing an original and five copies of an application for Western to provide global facilities-based and resale telecommunications services under Section 214 of the Communications Act of 1934, as amended. We are also enclosing a check in the amount of \$815.00 made to the order of the Federal Communications Commission to cover the filing fee. Please date-stamp the enclosed copy marked "Return Copy" and return it to us in the self-addressed stamped envelope provided for that purpose.

Any questions regarding this filing should be directed to undersigned counsel.

Very truly yours,


Doane F. Kiechel

Enclosure

5301091

Vendor Number 017056	Ret #	5301091
FEDERAL COMMUNICATIONS COMMISSION	INVOICE	AMOUNT
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Western Wireless Corporation Section 214 Application

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Patent #5,030,874

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Western Wireless Corporation and) File No. ITC-01-_____
Subsidiaries))
)
Application for authority pursuant to Section)
214 of the Communications Act of 1934, as)
amended, for global international authority to)
operate as facilities-based and resale carrier.)

**SECTION 214 APPLICATION OF
WESTERN WIRELESS CORPORATION AND SUBSIDIARIES**

Western Wireless Corporation (“WWC”), along with and on behalf of its subsidiaries (collectively, “Western”),¹ hereby request authority, pursuant to Section 214 of the Communications Act of 1934, as amended (the “Act”), 47 U.S.C. § 214, and Section 63.18 of the Commission’s Rules, 47 C.F.R. § 63.18, to provide global facilities-based and resale telecommunications services between the United States and all permissible international points. Western is filing this application pursuant to a Public Notice dated January 30, 2001, in which the Commission has provided carriers 90 days to come into compliance with Section 214 of the Act and the Commission’s Rules.²

Because Western’s indirect affiliation with certain foreign carriers is presumptively non-dominant,

¹ WWC respectfully requests that this application for Section 214 authority also include authority for its subsidiaries, which are the following: (1) Western CLEC Corporation; (2) WWC Paging Corporation; (3) WWC License L.L.C.; (4) WWC Texas RSA Limited Partnership; (5) WWC Holding Co., Inc.; and (6) Western Wireless International Corporation. If any additional subsidiaries of WWC will operate under the authorization granted herein, WWC will notify the FCC within 30 days in accordance with Section 63.21(i) of the Commission’s Rules, 47 C.F.R. § 63.21(i).

² See *International Bureau and Enforcement Bureau Announce Program to Increase Compliance with Licensing Requirements for carriers that Provide International Telecommunications Services and Operators of International Telecommunications Facilities Pursuant to Section 214 of the Communications Act and Sections 34-49 of the Submarine Cable Landing License Act*, Public Notice, DA 01-188, 2001 FCC LEXIS

Western seeks streamlined processing under Section 63.12 of the Commission's Rules, 47 C.F.R. § 63.12.

I. Introduction:

Western provides wireless communications services in the United States principally through the ownership and operation of cellular systems in small MSAs and in rural areas. As of December 31, 2000, Western provides cellular services in 19 western states under the Cellular One® (“Cellular One”) brand name. A wholly owned subsidiary of WWC, WWC Holding Co, Inc., owns 98 percent of Western Wireless International Corporation (“WWI”) which, through operating joint ventures, is a provider of wireless communications services in selected countries.

II. Information Required by Section 63.18 of the Commission's Rules:

In support of its application, Western submits the following information required under Section 63.18 of the Commission's Rules.

(a) Applicants' names, addresses, and telephone numbers:

Western Wireless Corporation	Western CLEC Corporation
3650 131st Avenue, S.E., Suite 400	3650 131st Avenue, S.E., Suite 400
Bellevue, WA 98006	Bellevue, WA 98006
(425) 586-8700	(425) 586-8700

WWC Paging Corporation	WWC Texas RSA Limited Partnership
3650 131st Avenue, S.E., Suite 400	3650 131st Avenue, S.E., Suite 400
Bellevue, WA 98006	Bellevue, WA 98006
(425) 586-8700	(425) 586-8700

WWC Holding Co., Inc.	Western Wireless International Corporation
3650 131st Avenue, S.E., Suite 400	3650 131st Avenue, S.E., Suite 400
Bellevue, WA 98006	Bellevue, WA 98006
(425) 586-8700	(425) 586-8700

WWC License L.L.C.
3650 131st Avenue, S.E., Suite 400
Bellevue, WA 98006
(425) 586-8700

- (b) WWC is a Washington corporation. Western CLEC Corporation is a Delaware corporation. WWC Paging Corporation is a Washington corporation. WWC License L.L.C. is a Delaware limited liability company. WWC Texas RSA Limited Partnership is a Delaware limited partnership. WWC Holding Co., Inc. is a Delaware corporation. Western Wireless International Corporation is a Delaware corporation.

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

Gene A. DeJordy, Esquire
Vice President of Regulatory Affairs
Western Wireless Corporation
3650 131st Avenue, S.E., Suite 400
Bellevue, WA 98006
(425) 586-8055

with a copy to

Louis Gurman, Esq.
Morrison & Foerster LLP
2000 Pennsylvania Avenue, N.W., Suite 5500
Washington, D.C. 20006
(202) 887-1500

- (d) None of the Western applicants has previously received authority under Section 214 of the Act.
- (e) Western is requesting Section 214 authority to operate as a global facilities-based and resale carrier to all permissible international points under the terms and conditions of Section 63.18(e)(1) and (2) of the Commission's Rules. Western certifies that it will comply with the terms and conditions contained in 47 C.F.R. §§ 63.21 and 63.23.
- (f) No response required.
- (g) No response required.
- (h) Name, address, citizenship, and principal business of 10 percent direct or indirect equity interest holders in Western.

Western has two classes of voting securities issued and outstanding: Class A common stock and Class B common stock. Class A has one vote per share and is publicly traded; Class B has ten votes per share and is not publicly traded. The two classes are otherwise identical. Western's subsidiaries listed in footnote 1 of this application and (a) above are directly and/or indirectly owned by WWWC.

a. John W. Stanton and Theresa E. Gillespie ("Stanton and Gillespie), husband and wife, hold 86 percent of Western Class B common stock and 7.94 percent of the equity interest and 42.78 percent of the voting interest in Western.³ Stanton and Gillespie are U.S. citizens and have their principal business address at 3650 131st Avenue, S.E., Suite 400, Bellevue, Washington 98006. John W. Stanton is Chairman and Chief Executive Officer of WWWC. Theresa E. Gillespie is Executive Vice President of WWWC.

b. PN Cellular, Inc. ("PN Cellular"), a Washington corporation, holds 23.9 percent of Western Class B common stock. PN Cellular is 78.7 percent owned by John W. Stanton and Theresa Gillespie.³ PN Cellular's principal business address is P.O. Box 53508, Bellevue, Washington 98015-3508, and its principal business is communications.

c. Stanton Communications Corporation ("SCC"), a Washington corporation, holds 18.1 percent of Western Class B common stock. SCC is 94.2 percent owned by John W. Stanton and Theresa Gillespie.³ SCC's principal business address is P.O. Box 53508, Bellevue, Washington 98015-3508, and its principal business is communications.

d. Stanton Family Trust ("SFT") holds 1 percent of Western Class B common stock. SFT's principal business address is P.O. Box 53508, Bellevue, Washington 98015-3508.

e. Janus Capital Corporation ("Janus"), a Colorado corporation, holds 11.34 percent of Western Class A common stock and holds a 10.33 percent equity interest in Western.⁴ Janus' principal business address is 100 Fillmore Street, Denver, Colorado 80206, and the principal business is to manage U.S. mutual funds.

³ These ownership percentages include stock held by the following affiliates of Stanton and Gillespie: (1) Stanton Family Trust; (2) PN Cellular, Inc.; and (3) Stanton Communications Corporation. Each of these entities has the same address as Stanton and Gillespie. Stanton and Gillespie also hold a minimal amount of shares in Class A common stock.

⁴ These figures are current as of March 12, 2001, and as reported by Janus in a Securities Exchange Commission Schedule 13G/A. Janus' interest in Western, however, varies and fluctuates over time.

- a. Ireland is a Member of the World Trade Organization.
 - b. Iceland is a Member of the World Trade Organization
 - c. Slovenia is a Member of the World Trade Organization.
 - d. Croatia is not a Member of the World Trade Organization but VIP-Net, WWI's operating company in that country, is a new entrant that has well below a 50 percent market share in the Croatian market.
 - e. Georgia is a Member of the World Trade Organization.
 - f. Ghana is a Member of the World Trade Organization.
 - g. Côte d'Ivoire is a Member of the World Trade Organization.
 - h. Bolivia is a Member of the World Trade Organization.
 - i. Haiti is a Member of the World Trade Organization.
- (l) The foreign carriers listed herein in which Western has an indirect affiliation are all providers of wireless communications services in their respective countries. These carriers provide mobile wireless communications and have well below a 50 percent market share in the international transport and the local access markets on the foreign end of the route under Section 63.10(a)(3). Therefore, Western is presumptively non-dominant.
- (m) The foreign carriers listed herein in which Western has an indirect affiliation are all providers of wireless communications services in their respective countries. These carriers are new entrants that have well below a 50 percent market share in the international transport and the local access markets on the foreign end of the route under Section 63.10. Therefore, Western is presumptively non-dominant.
- (n) Western certifies that it has not agreed to accept any special concessions, as defined by the Commission's Rules, directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possess market power on the foreign end of the route, and will not enter into such agreements in the future.
- (o) Western certifies that, in accordance with Sections 1.2001-1.2003 of the Commission's Rules, it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853.
- (p) Western qualifies for streamlined treatment under Section 63.12 of the Commission's Rules. Western's indirect affiliation with the foreign carriers listed herein is presumptively non-dominant under Section 63.10(a)(3). The foreign carriers listed herein are new entrants and have well below a 50 percent market share in the international transport and the local access markets on the foreign end of the route. In addition, these nine foreign carriers own only mobile wireless facilities in the destination markets under Section 63.12(c)(1)(iii).

III. Conclusion:

In view of the foregoing, Western submits that the public interest, convenience, and necessity would be furthered by grant of this instant request for authority to provide global facilities-based and resale authority. Accordingly, Western respectfully requests grant of the instant application.

Respectfully submitted,

WESTERN WIRELESS CORPORATION

By: 

Gene A. DeJordy, Esq.

Vice President of Regulatory Affairs
Western Wireless Corporation
3650 131st Avenue, S.E., Suite 400
Bellevue, Washington 98006
(425) 586-8055

Dated: April 25, 2001