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With copy to:

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- (d) C2C has not previously received authority under Section 214 of the Act.
- (e) C2C requests the following authority in this Application:
  - Authority to operate as a facilities-based carrier, pursuant to the terms and conditions of Section 63.18(e)(1) of the Commission's Rules, on all routes *except* Singapore, Australia, Malaysia, Sri Lanka, Hong Kong, the United Kingdom, Japan, South Korea, and the Philippines. As evidenced by the certificate provided in Attachment 1, C2C will comply with the terms and conditions contained in Sections 63.21 and 63.22 of the Commission's Rules;
  - Authority to operate as a resale carrier, pursuant to the terms and conditions of Section 63.18(e)(2) of the Commission's Rules, on all routes *except* Singapore, Australia, Malaysia, Sri Lanka, Hong Kong, the United Kingdom, Japan, South Korea, and the Philippines. As evidenced by the certificate provided in Attachment 1, C2C will comply with the terms and conditions contained in Sections 63.21 and 63.23 of the Commission's Rules; and
  - Authority to operate as a resale and facilities-based carrier, pursuant to the Section 63.18(e)(4) of the Commission's Rules, between the U.S. and Singapore, Australia, Malaysia, Sri Lanka, Hong Kong, the United Kingdom, Japan, South Korea, and the Philippines. C2C requests authority to provide services of the type and in the manner described in Sections 63.22 and 63.23 of the Commission's Rules. C2C also requests authority to provide switched services over private lines on the U.S. – Singapore route. As evidenced by the certificate provided in Attachment 1, C2C will comply with the terms and



conditions contained in Sections 63.21, 63.22, and 63.23 of the Commission's Rules.

(f) No response required.

(g) C2C 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) Singapore Telecommunications Limited ("SingTel"), a corporation organized under the laws of Singapore, holds approximately 61 percent of the ownership interest in C2C through several indirect subsidiaries.<sup>1</sup> The principal business of SingTel is the provision of local intercity, and international communications services in Singapore. Temasek Holdings (Private) Limited ("Temasek") holds an approximately 80 percent ownership interest in SingTel. Temasek is wholly-owned by the Minister for Finance (Incorporated) in Singapore; it is an investment holding company with diverse interests in a wide spectrum of industries including media, financial services, transportation, ship repair and engineering, properties, hotels, property management and consultancy, construction, leisure and recreation.<sup>2</sup> No other stockholder holds 10 percent or more of the stock in C2C through SingTel.

In addition, TyCom Ltd. ("TyCom"), a corporation organized under the laws of Bermuda, holds 15 percent of the ownership interest in C2C.<sup>3</sup> The principal business of TyCom is the provision of undersea fiber optic networks and services. TyCom engages in the design, engineering, manufacture, installation and maintenance of these networks. Tyco International Ltd. ("Tyco"), a corporation organized under the laws of Bermuda, holds an 88 percent ownership interest in TyCom (and thus a 15 percent ownership interest in C2C under the Commission's ownership attribution rules). Tyco manufactures and installs fire and safety systems, and provides electronic security services, disposable medical products, packaging materials, flow control products, electrical and electronic components and underwater telecommunications systems. No other stockholder holds 10 percent or more of the stock in C2C through TyCom.

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<sup>1</sup> The address of SingTel is 31 Exeter Road, Comcentre, Singapore 239732.

<sup>2</sup> The address of Temasek is 8 Shenton Way, #38-03, Temasek Tower, Singapore 068811. To the best of C2C's knowledge and belief, Temasek holds ownership interests in other telecommunications companies in Singapore which are competitors of SingTel and which hold certain licenses to provide mobile cellular telephone and radio paging services in Singapore. However, C2C is uncertain as to whether Temasek holds ownership interests in telecommunications companies in other countries.

<sup>3</sup> The address of TyCom is the Zurich Center, Second Floor, Suite 201, 90 Pitts Bay Road, Pembroke, HM 08, Bermuda.

SingTel and TyCom (and their parent companies) are the only 10 percent or greater shareholders in C2C. The following individuals are directors of C2C as well as other foreign carrier affiliates:

- Toon LIM (Singapore Telecom Hong Kong Limited, Information Network Services Sdn Bhd, Singapore Telecom Australia Pty Limited, Singapore Telecom Japan Co Ltd, and Singapore Telecom Korea Limited).
- Shyong LIM (GB 21 (Hong Kong) Limited)
- Wing Chee HOH (GB21 (Hong Kong) Limited)

(i) As evidenced by the certification provided in Attachment 1, C2C is affiliated with foreign carriers in Singapore, Australia, Malaysia, Sri Lanka, Hong Kong, the United Kingdom, Japan, South Korea, and the Philippines.

(j) As evidenced by the certification provided in Attachment 1, SingTel (a foreign carrier in Singapore) controls C2C, as well as C2C's affiliated carriers in Sri Lanka (Lanka Communications Services (Private) Ltd), Hong Kong (Singapore Telecom Hong Kong Ltd. and GB21 (Hong Kong) Ltd.), Malaysia (Information Network Services Sdn Bhd), Australia (Singapore Telecom Australia Pty Limited), Japan (Singapore Telecom Japan Co Limited), South Korea (Singapore Telecom Korea Limited) and the United Kingdom (Singapore Telecom (Europe) Limited).

(k) Every country listed in (j) above is a member of the World Trade Organization (“WTO”).

(l) On the U.S. – Singapore route, C2C will file the quarterly traffic reports required by Section 43.61(c) of the Commission’s Rules. For all other affiliated routes, a showing that would satisfy Section 63.10(a)(3) of the Commission’s Rules is provided in (m) below.

(m) C2C will accept dominant carrier treatment in its provision of service to Singapore. On all other routes on which C2C is affiliated with a foreign carrier, C2C requests nondominant treatment in its provision of service. As shown below, C2C is entitled to a presumption of nondominant treatment under Section 63.10(a)(3) on the Commission’s Rules on each of these routes. In addition, C2C notes that the FCC implicitly recognized that C2C’s affiliated carriers in the Philippines, Sri Lanka, the United Kingdom, and Hong Kong (Singapore Telecom Hong Kong Limited) lack market power on the relevant route in granting Singapore Telecom USA, Inc. authority to provide service to each of these locations on a nondominant basis in File No. ITC-214-19981005-00681 on November 20, 1998.

Australia: C2C’s affiliate in Australia, Singapore Telecom Australia Pty Limited (“SingTel Australia”) provides international voice and data services in that



country. SingTel Australia's share of the international transport and local access market is less than 1 percent. Telstra is the dominant provider of domestic and international telecommunications services in Australia.

The Philippines: Globe Telecom (formerly known as GMCR, Inc.) is C2C's affiliate in the Philippines. GMCR provides international and fixed line telecommunications services as well as cellular mobile telephone services in the Philippines; its market share of the international transport and local access markets is approximately 10 percent. The dominant provider of telecommunications services in the Philippines is Philippines Long Distance Telephone Company.

Sri Lanka: In Sri Lanka, C2C's affiliate is Lanka Communications Services (Private) Limited ("Lankacom"), a provider of data communications services including private line and VSAT services. Sri Lanka Telecom is the dominant provider of telecommunications services in Sri Lanka. Lankacom's share of the international transport and local access markets in Sri Lanka is approximately 5 percent.

Malaysia: Information Network Services Sdn Bhd ("INS"), C2C's affiliate in Malaysia, provides data communication and value-added services. The market share of INS in Malaysia is less than 1 percent. The dominant provider of telecommunications services in Malaysia is Telecom Malaysia.

Hong Kong: In Hong Kong, C2C is affiliated with two foreign carriers: Singapore Telecom Hong Kong Limited ("SingTel HK") and GB21 (Hong Kong) Limited ("GB21"). SingTel HK holds Public Non-Exclusive Telecommunications Services ("PNETS") Licenses to provide international value-added network services and virtual private network services. All services are provided on a resale basis. SingTel HK estimates that its share of the relevant international market is less than 1 percent. Similarly, GB21 provides international bandwidth, backhaul and IP services in Hong Kong. Its share of the relevant international market is also less than 1 percent. The Commission has recognized that the dominant provider of telecommunications services in Hong Kong is Hong Kong Telecom.

United Kingdom: In the U.K., Singapore Telecom (Europe) Limited ("SingTel Europe") is C2C's affiliate. SingTel (Europe) holds international facilities and international voice simple resale licenses in the U.K. Its share of the relevant international market is less than 1 percent. The Commission has recognized British Telecommunications plc as the dominant provider of telecommunications services in the U.K.

Japan: Singapore Telecom Japan Co Limited ("STJ") is C2C's affiliate in Japan. STJ provides IPLCs under a Type 1 license as well as wholesale voice and other services pursuant to a Type 2 license in Japan. STJ's share of the relevant market

is less than 1 percent. The Commission has recognized Kokusai Denshin Denwa Co., Ltd. and Nippon Telegraph & Telephone Corporation as the dominant providers of telecommunications services in Japan.

South Korea: In South Korea, C2C is affiliated with Singapore Telecom Korea Limited (“STK”). STK holds a VSP license in South Korea, pursuant to which STK offers services including frame relay, VPN, and IP. STK’s share of the relevant international market is less than 1 percent. The Commission has recognized Korea Telecom as the dominant provider of telecommunications services in South Korea.

(n) As evidenced by the certification provided in Attachment 1, C2C 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 sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future.

(o) As evidenced by the certification provided in Attachment 1, no party to this Application is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

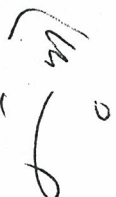
(p) C2C requests streamlined processing for this Application pursuant to Section 63.12 of the Commission’s Rules. This Application is eligible for streamlined processing because on every route for which authority is requested, either (1) C2C has no foreign carrier affiliate; or (2) C2C is affiliated with a foreign carrier in a destination market, but as demonstrated in (m) above, C2C qualifies for a presumption of non-dominance under Section 63.10(a)(3) of the Commission’s Rules; or (3) C2C is affiliated with a foreign carrier in a destination market which is a WTO member country and C2C agrees to be classified as a dominant carrier on the route. In addition, C2C is not affiliated with a dominant U.S. carrier whose international services C2C seeks authority to resell. Finally, except as provided in Sections 63.22(e)(2) and 63.23(d)(2) of the Commission’s Rules, C2C does not request authority in this Application to provide switched services over private lines to countries not previously authorized by the Commission for this service.

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For these reasons, C2C requests that the Commission grant this Application. JUN 19 2001

Respectfully Submitted, Telecom Division  
International Bureau

C2C (USA) INC.



By: \_\_\_\_\_

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(202) 955-9600  
Its Attorneys

Date: June 14, 2001



CERTIFICATE

The undersigned hereby certifies, on behalf of C2C (USA) Inc. ("C2C") with respect to the foregoing application for authority to provide international service, that:

1. C2C is not affiliated with any U.S. carrier whose facilities-based service C2C may resell.
2. C2C is affiliated with the foreign carriers in the countries listed in Annex A to this Certificate. The carriers so noted are controlled by Singapore Telecommunications Limited ("SingTel"), a foreign carrier that controls C2C.
3. C2C 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 sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future.
4. No party to this Application is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

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Date: \_\_\_\_\_



**C2C FOREIGN CARRIER AFFILIATES**

<u>Carrier</u>	<u>Country</u>
Singapore Telecommunications Limited	Singapore
GB 21 (Hong Kong) Limited*	Hong Kong
Singapore Telecom Hong Kong Limited*	Hong Kong
Lanka Communications Services (Private) Limited*	Sri Lanka
Globe Telecom	Philippines
Singapore Telecom (Europe) Limited*	United Kingdom
Information Network Services Sdn Bhd*	Malaysia
Singapore Telecom Australia Pty Limited*	Australia
Singapore Telecom Japan Co Ltd*	Japan
Singapore Telecom Korea Limited*	South Korea

\* denotes carrier controlled by Singapore Telecommunications Limited