

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

In the Matter of	)	
	)	
	)	
Epsilon Telecommunications (US) Pte. Ltd.	)	
(FRN 0020519500)	)	
	)	
Application for Global Authority	)	File No. ITC-214-_____ - _____
Pursuant to Section 214 of the	)	
Communications Act of 1934, as amended,	)	
to Operate as an International Facilities-Based	)	
and Resale Carrier Between the United States	)	
and Various International Points	)	
	)	

APPLICATION

Epsilon Telecommunications (US) Pte. Ltd. (“Epsilon” or “Applicant”) hereby requests global facilities-based authority and global resale authority, under 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 international telecommunications services between the United States and international points. As explained herein, this Application is entitled to streamlined processing under Section 63.12(c)(1)(ii) of the Commission’s Rules, 47 C.F.R. § 63.12(c)(1)(ii).

I. THE APPLICANT

Epsilon is a company formed in Singapore located at 151 Lorong Chuan, #06-02 New Tech Park Singapore 556741. Epsilon is authorized to provide telecommunications services in Singapore. Epsilon does not have more than a 50% market share in the international transport and local access markets in any of the countries in which it operates, and is therefore presumptively considered to be a non-dominant service provider pursuant to Section 63.10(a)(3)

of the Commission's Rules, 47 C.F.R. §63.10(a)(3). In addition, Epsilon has no affiliation with a dominant U.S. carrier whose international switched or private line services it seeks authority to resell and does not seek authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of such services.

II. PUBLIC INTEREST CONSIDERATIONS

By granting this application, the Commission will serve the public interest, convenience, and necessity by increasing competition in the international service market. Epsilon believes that the added competition it will bring to the market will benefit the consumers of United States international telecommunications services. These benefits include competitive pricing and increased availability of a variety of innovative service options. Therefore, grant of this Application will further the public interest.

III. INFORMATION REQUIRED BY SECTION 63.18

Epsilon submits the following information, as required by Section 63.18 of the Commission's Rules, in support of this Application:

- (a) Name, address and telephone number of Applicant:

Epsilon Telecommunications (US) Pte. Ltd.
151 Lorong Chuan, #06-02
New Tech Park Singapore 556741
Tel: +65 3106 4020

- (b) Applicant is organized under the laws of Singapore.

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

Andrew Lipman
Danielle Burt
BINGHAM MCCUTCHEN LLP
2020 K Street, N.W.
Washington, DC 20006
Tel: (202) 373-6000
Fax: (202) 373-6001
Email: andrew.lipman@bingham.com
danielle.burt@bingham.com

with a copy to:

Sharon Tang
General Counsel
151 Lorong Chuan, #06-02 New Tech Park Singapore 556741
Tel: +65 3106 4020
Fax: +65 6281 0470
Email: s.tang@epsilontel.com

- (d) Epsilon has not previously received authority under Section 214 of the Act.
- (e) Epsilon requests global Section 214 authority to operate as a facilities-based and resale international carrier pursuant to Sections 63.18(e)(1) and 63.18(e)(2), respectively, of the Commission's Rules. Epsilon requests such authorization for all international routes authorized by the Commission. As indicated above, while Epsilon is a carrier in Singapore, it does not have more than a 50% market share in the international transport and local access markets in any of the countries in which it operates and does have sufficient market power in the destination markets to affect competition adversely in the U.S. market. Applicant certifies that it will comply with the terms and conditions of Sections 63.21, 63.22, and 63.23 of the Commission's Rules.
- (f) Epsilon seeks Section 214 authorization to provide only the services referenced under paragraph (e) of Section 63.18 of the Commission's Rules.
- (g) Epsilon will use previously authorized facilities to provide the services requested by the Application. Consequently, Epsilon is categorically excluded from environmental assessment pursuant to Section 1.1306 of the Commission's Rules. 47 C.F.R. § 1.1306.
- (h) The following entities hold a ten percent (10%) or greater, direct or indirect, ownership interest in **Epsilon Telecommunications (US) Pte. Ltd.:**

Name:	Andreas Hipp
Address:	7 Jervois Close #01-15 One Jervois, Singapore (249103)
Citizenship:	Austrian
Percentage Owned:	40%
Principal Business:	Individual

Name:	Jerzy Szlosarek
Address:	27 Dairy Farm Road #01-03 Dairy Farm Estate Phase 3, Singapore (679048)

Citizenship: United Kingdom
Percentage Owned: 30%
Principal Business: Individual

Name: Roy Martin Bell
Address: 145 Serangoon Avenue 3
#05-04
Springbloom, Singapore (556122)
Citizenship: United Kingdom
Percentage Owned: 30%
Principal Business: Individual

No other individual or entity owns or controls more than 10% directly or indirectly of Epsilon Telecommunications (US) Pte. Ltd. Andreas Hipp, Jerzy Szlosarek and Roy Martin Bell have the following directorates with foreign carriers:

Andreas Hipp:

Epsilon Telecommunications Holdings Limited
Epsilon Telecommunications Limited
Epsilon Global Hubs Limited
Epsilon Telecommunications (HK) Limited
Epsilon Telecommunications (SP) Pte. Ltd.
Epsilon Global Communications Pte. Ltd.

Jerzy Szlosarek:

Epsilon Telecommunications Limited
Epsilon Global Hubs Limited
Epsilon Telecommunications (SP) Pte. Ltd.

Roy Martin Bell:

Epsilon Telecommunications Limited
Epsilon Global Hubs Limited
Epsilon Telecommunications (SP) Pte. Ltd.

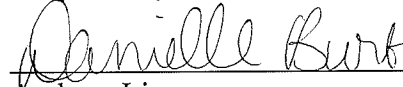
- (i) Epsilon certifies it is a foreign carrier in Singapore within the meaning of Section 63.09(d) of the Commission's Rules, 47 C.F.R. §63.09(d). Epsilon further certifies that it is not affiliated with a foreign carrier within the meaning of Section 63.09(e) of the Commission's Rules, 47 C.F.R. §63.09(e).
- (j) Epsilon certifies that it seeks to provide international telecommunications services to all global points, including Singapore. The only exception is Epsilon is not seeking authority to provide service to any point on the Commission's Exclusion List, which currently is only Cuba on a facilities basis.

- (k) Singapore is a Member of the World Trade Organization and Epsilon lacks market power in the relevant services market of Singapore.
- (l) Epsilon may resell the international switched or private line services of unaffiliated U.S. carriers for the purpose of providing telecommunications services to Singapore where Epsilon operates as a carrier.
- (m) Epsilon presumptively qualifies for non-dominant treatment to Singapore pursuant to Section 63.10(a)(3) of the Commission's Rules, 47 C.F.R. § 63.10(a)(3). Epsilon does not have more than a 50% market share in the relevant service market, and is therefore presumptively considered to be a non-dominant service provider.
- (n) Epsilon certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier where the foreign carrier possesses market power on the foreign end of the route and Epsilon will not enter into such agreements in the future.
- (o) Epsilon certifies, pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules (implementing the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862), it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
- (p) This application qualifies for streamlined processing pursuant to Section 63.12 of the Commission's Rules, 47 C.F.R. § 63.12. Although the Applicant is a carrier in Singapore, it qualifies for a presumption of non-dominance under Section 63.10(a)(3) because it lacks a 50% market share in the relevant service market on the foreign end of the route.

IV. CONCLUSION

For the reasons stated above, Epsilon Telecommunications (US) Pte. Ltd. respectfully submits that the public interest, convenience, and necessity would be furthered by a grant of this Application.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Danielle Burt", is written over a horizontal line.

Andrew Lipman

Danielle Burt

Bingham McCutchen LLP

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Washington, DC 20006

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danielle.burt@bingham.com

Counsel for Epsilon Telecommunications (US)
Pte. Ltd.

Dated: March 16, 2011

CERTIFICATION OF APPLICANT

The undersigned hereby certifies, on behalf of Epsilon Telecommunications (US) Pte. Ltd. ("Epsilon"), with respect to the foregoing application for section 214 authority to provide international services, that:

1. Epsilon will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules, 47 C.F.R. §63.21-.23.

2. Epsilon 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.

3. Epsilon is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

4. The contents of the Application are true and correct to the best of my knowledge, information, and belief.

Epsilon Telecommunications (US) Pte. Ltd.

By: 

Name: Andreas Hipp

Title:

Date: March 14, 2011