BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, D.C. 20554

In the Matter of)		
)		
SBC Telecom N.A., LLC)		
Application Under Section 214 of the)		
Communications Act of 1934, as Amended,)	Case No	
For Global Authority for the Provision of)		
Resold International Switched Line Services)		
Between the U.S. and Various International)		
Points)		

APPLICATION

SBC Telecom N.A., LLC ("Applicant"), by its attorneys and pursuant to Section 214 of the Communications Act of 1934, as amended, hereby requests global authority to operate as a resale carrier, pursuant to the terms and conditions of Section 63.18(e)(2) of the Commission's Rules, to all foreign points as authorized by the Commission. SBC Telecom N.A., LLC has no affiliation with any foreign carrier in any of the destination countries for which authority is requested, nor is SBC Telecom N.A., LLC affiliated with any dominant U.S. carrier whose services SBC Telecom N.A., LLC may resell.

Thus, pursuant to Section 63.10(a)(1) of the Commission's Rules, SBC Telecom N.A., LLC should be classified as a non-dominant carrier in its provision of international service on all routes.³ Furthermore, as explained herein, this Application is entitled to streamlined processing under Section 63.12 of the Commission's Rules.⁴ In accordance with the FCC's fee schedule, Fee

¹ 47 U.S.C. §214.

² 47 C.F.R. §63.18(e)(2).

³ 47 C.F.R. §63.10(a)(1).

^{4 47} C.F.R. §63.12.

Code CUT, a check in the amount of \$1,015.00 along with a FCC Form 159 Remittance Advice is being submitted to the Commission under separate cover.

In support of its request for authority, SBC Telecom N.A., LLC submits the following information pursuant to Section 63.18 of the Commission's Rules:⁵

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

SBC Telecom N.A., LLC 1800 Old Meadow Rd. Suite 506 Mclean, VA 22102 Tel: 703 821 2052

Fax: 703 821 2053

- (b) SBC Telecom N.A., LLC is a limited liability company organized under the laws of the State of Delaware.
 - (c) Correspondence concerning this Application should be addressed to:

Geoffrey B. Amend, Esq. DuPont Building 309 S. Laura, Suite 200 Wichita, KS 67211 316-204-4105 (telephone) 316-269-1021 (facsimile) gamend@us-sbc.com

with copies to:

Mohammad Barmawi SBC Telecom N.A., LLC 1800 Old Meadow Rd. Suite 506 Mclean, VA 22102 Tel: 703 821 2052

Fax: 703 821 2053

(d) SBC Telecom N.A., LLC has not previously received authority under Section 214 of the Communications Act to provide global resale services.

⁵ 47 C.F.R. §63.18.

(e) SBC Telecom N.A., LLC is applying for authority to operate as a resale carrier pursuant to the terms and conditions of Section 63.18(e)(2).⁶ SBC Telecom N.A., LLC requests authority to serve all countries permitted under a grant of global authority. As evidenced by the certification provided in Attachment A, SBC Telecom N.A., LLC will comply with the terms and conditions contained in Sections 63.21 and 63.23 of the Commission's Rules.⁷

(f) At this time, SBC Telecom N.A., LLC does not seek authority to provide service not referenced under paragraph (e) of Section 63.18 of the Commission's Rules.⁸

(g) At this time, SBC Telecom N.A., LLC does not seek authority to provide facilities-based international service.⁹

(h) The name, address, and principal business of those persons or entities directly or indirectly holding more than 10 percent of the equity of SBC Telecom N.A., LLC are as follows:

Shareholder:

Mohammad Barmawi

Ownership Percentage:

100%

Address:

1800 Old Meadow Rd. Apt. 506

Mclean, VA 22102

Principle Business:

Investor

Citizenship:

American Citizen

(i) As evidenced by the certification attached hereto as Attachment A, SBC Telecom N.A., LLC is not affiliated with a foreign carrier.

(j) As evidenced by the certification attached hereto as Attachment A, SBC Telecom N.A., LLC does not seek to provide international telecommunications service to any destination where: (1) SBC Telecom N.A., LLC is a foreign carrier in that country; (2) SBC Telecom N.A., LLC controls a foreign carrier in that country; (3) any entity that owns more than a 25% interest

⁶ 47 C.F.R. §63.18(e)(2).

⁷ 47 C.F.R. §§63.21,23.

⁸ 47 C.F.R. §63.18(e).

⁹ 47 C.F.R. §63.18(e).

in SBC Telecom N.A., LLC, or controls SBC Telecom N.A., LLC, controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% of SBC Telecom N.A., LLC and are parties to, or the beneficiaries of, a contractual relationship that affects the provision or marketing of international basic telecommunications services in the U.S.

- (k) Not applicable; SBC Telecom N.A., LLC is not affiliated with or otherwise related to any foreign carrier on any of the routes where SBC Telecom N.A., LLC proposes to provide service in this Application.
- (l) Not applicable; SBC Telecom N.A., LLC is not a foreign carrier and is not affiliated with a foreign carrier on any of the routes where SBC Telecom N.A., LLC proposes to resell international telecommunications service.
- (m) Not applicable; SBC Telecom N.A., LLC is not affiliated with any foreign carrier on any of the routes where SBC Telecom N.A., LLC proposes to provide services.
- (n) As evidenced by the certification provided in Attachment A, SBC Telecom N.A., LLC 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) As evidenced by the certification provided in Attachment A, no party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.¹⁰
- (p) SBC Telecom N.A., LLC respectfully requests streamlined processing of this Application pursuant to Section 63.12 of the Commission's Rules.¹¹ This Application qualifies for streamlined processing for the following reasons: (1) SBC Telecom N.A., LLC is not

^{10 21} U.S.C. §853a.

^{11 47} C.F.R. §63.12.

affiliated with a foreign carrier on any route for which authority is sought; (2) SBC Telecom

N.A., LLC is not affiliated with any dominant U.S. carrier whose international switched or

private lines services it seeks to resell; and (3) SBC Telecom N.A., LLC is not requesting

authority to provide switched service over private lines to countries not previously authorized for

service by the Commission.

Wherefore, SBC Telecom N.A., LLC respectfully requests that the Commission grant it

authority to provide international telecommunications services on resale basis pursuant to

Section 214 of the Communications Act of 1934, as amended.

Respectfully submitted,

SBC Telecom N.A., LLC

River

Mohammad Barmawi, Manager

Date:

CERTIFICATION

The undersigned hereby certifies, on behalf of SBC Telecom N.A., LLC ("SBC Telecom N.A., LLC") with respect to the foregoing application for authority to provide international services, that:

- SBC Telecom N.A., LLC is not affiliated with any foreign carrier in any of the countries to which SBC Telecom N.A., LLC proposes to provide service in the foregoing application.
- 2. SBC Telecom N.A., LLC will comply with the terms and conditions contained in Section 63.21 and 63.23 of the Commission's Rules. 47 C.F.R. §§63.21,23.
- 3. SBC Telecom N.A., LLC does not seek to provide international telecommunications service to any destination where: (1) SBC Telecom N.A., LLC is a foreign carrier in that country; (2) SBC Telecom N.A., LLC controls a foreign carrier in that country; (3) any entity that owns more than a 25% interest in SBC Telecom N.A., LLC, or controls SBC Telecom N.A., LLC, controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% of SBC Telecom N.A., LLC and are parties to, or the beneficiaries of, a contractual relationship that affects the provision or marketing of international basic telecommunications services in the United States.
- 4. SBC Telecom N.A., LLC 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.
- 5. No party to this application is subject to a denial for Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §853(a).

SBC Telecom N.A., LLC

Mohammad Barmawi, Manager

Date: 6/6/2011