

**Global Reach Communications, Inc.
Application for International Section 214 Authority**

Attachment 2

Response to Item 14 (Rule Section 63.18(h))

Global Reach Communications, Inc. ("Global Reach") is a wholly owned subsidiary of VIP Holdings, Inc. ("VIP Holdings"). A 57.5% ownership interest in VIP Holdings is held by Mr. Graham M. Milne, a citizen of the United Kingdom.¹ A 42.5% ownership interest in VIP Holdings is held by Mr. Peter J. Rogers, also a citizen of the United Kingdom.²

Name: VIP Holdings, Inc.
Address: PO Box 1517
City/State/Zip: Sterling, VA 201167
Citizenship/State of Incorporation: Virginia
Ownership: 100%
Principal Business: Telecommunications

Name: Mr. Graham M. Milne
Address: PO Box 1517
City/State/Zip: Sterling, VA 201167
Citizenship: United Kingdom; Permanent Resident of the United States
Ownership: 57.5%
State of Incorporation: n/a
Principal Business: Telecommunications

Name: Peter J. Rogers
Address: 20691 Chauncey Lane
City/State/Zip: Leesburg, VA 20175
Citizenship: United Kingdom; Permanent Resident of the United States
Ownership: 42.5%
State of Incorporation: n/a
Principal Business: Telecommunications

Applicant has no interlocking directorates with a foreign carrier.

Responses to Item 15

Rule Section 63.18(d)

Global Reach holds no previous authority under Section 214 of the Communications Act. A commonly owned affiliate of Global Reach, VIP Communications, Inc., holds International Section 214 Authority, File No. ITC-214-19961125-00600.

¹ Mr. Milne is a citizen of the United Kingdom. Mr. Milne has, however, been a permanent US resident since 1995 and holds an unconditional "Green Card." His INS Registration number is 045-113-543.

² Mr. Rogers is a citizen of the United Kingdom. Mr. Rogers has, however, been a permanent US resident for over ten years and holds an unconditional "Green Card." His INS Registration number is A-055 14 3368.

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Rule Section 63.18(e)(3)

Global Reach seeks International Section 214 authority to operate as a resale carrier pursuant to Section 63.18(e)(2) of the Commission's. Applicant will comply with all of the terms and conditions set forth in Section 63.21, and 63.23 of the Commission's rules, 47 C.F.R. §§ 63.21, and 63.23.

Rule Section 63.18(g)

Global Reach is not seeking facilities-based authority under paragraph (e)(4) of Section 63.18.