

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

In the Matter of)	
)	
GE Flight Efficiency Services, Inc.)	
(FRN 0028819381))	
)	
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)	
Resale Carrier Between the United States)	
and Various International Points)	
)	

APPLICATION

GE Flight Efficiency Services, Inc. (“GE Flight” or “Applicant”) hereby requests 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 by resale between the United States and international points. As explained herein, this Application is eligible for streamlined processing under Section 63.12(a) of the Commission’s Rules, 47 C.F.R. § 63.12(a).

I. THE APPLICANT

GE Flight is a corporation formed under the laws of the State of Texas with its principal place of business located at 400 W. 15th Street, Suite 1200, Austin, Texas 78701. GE Flight does not currently provide any telecommunications services. Neither GE Flight nor any of its owners or affiliates have more than a 50% market share in the international transport and local access markets in any country, and GE Flight is therefore presumptively considered 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).

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. GE Flight believes that the added competition it will bring to the market will benefit the consumers of United States 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

GE Flight 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:

GE Flight Efficiency Services, Inc.
400 W. 15th Street, Suite 1200
Austin, Texas 78701
Tel: (737) 701-5072

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

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

Raghu Seshadri
Senior Counsel – Commercial
400 W. 15th Street, Suite 1200
Austin, Texas 78701
Tel: (737) 701-5072
Email: Raghu.Seshadri@ge.com

with a copy to:

Russell M. Blau
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, N.W.
Washington, DC 20004
Tel: (202) 373-6035
Email: russell.blau@morganlewis.com

- (d) GE Flight has not previously received authority under Section 214 of the Act.
- (e) GE Flight requests global Section 214 authority to operate as a resale carrier pursuant to § 63.18(e)(2) of the Commission's rules. GE Flight requests such authorization for all international routes authorized by the Commission. Applicant certifies that it will comply with the terms and conditions of Sections 63.21 and 63.23 of the Commission's Rules.
- (f) GE Flight seeks Section 214 authorization to provide only the services referenced under paragraph (e)(3) of Section 63.18 of the Commission's Rules.
- (g) GE Flight is not seeking facilities-based authority under paragraph (e)(3) of Section 63.18 of the Commission's Rules.
- (h) GE Flight is 100% owned and controlled by GE Engine Services, LLC ("GE Engine"), which is itself a wholly owned (100%) subsidiary of the General Electric Company. General Electric Company is a publicly-traded company whose stock is widely held, and no person or entity controls 10% or more of its stock. No other person or entity directly or indirectly owns at least ten percent of the equity of the applicant. Neither GE Flight, GE Engine, nor the General Electric Company has any interlocking directorates with a foreign carrier. The name, address, citizenship and principal business of the aforementioned entities in GE Flight's ownership chain are as follows:

Name: GE Engine Services, LLC
Address: 1 Neumann Way Cincinnati, OH 45215
Citizenship: Ohio
Principal Business: Industrial maintenance services

Name: General Electric Company
Address: 41 Farnsworth Street, Boston, MA 02210
Citizenship: Massachusetts
Principal Business: High-tech industrial company
- (i) GE Flight certifies it is not a foreign carrier within the meaning of Section 63.09(d) of the Commission's Rules, 47 C.F.R. § 63.09(d). GE Flight also certifies it is not affiliated with any foreign carrier within the meaning of Section 63.09(e) of the Commission's Rules, 47 C.F.R. § 63.09(e).
- (j) GE Flight certifies that it does not seek authorization to provide international telecommunications services to any destination country for which Section 63.18(j) of the Commission's Rules, 47 C.F.R. § 63.18(j), applies.
- (k) Not applicable.

- (l) [Reserved]
- (m) GE Flight is not a foreign carrier within the meaning of Section 63.09(d) of the Commission's Rules, 47 C.F.R. § 63.09(d). GE Flight is also 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).
- (n) GE Flight 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 GE Electric will not enter into such agreements in the future.
- (o) GE Flight 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(a) of the Commission's Rules, 47 C.F.R. § 63.12(a). Neither GE Flight, GE Engine, nor the General Electric Company is affiliated with a foreign carrier in a destination market, or has an affiliation with a dominant U.S. carrier.

IV. **CONCLUSION**

For the reasons stated above, GE Flight Efficiency Services, Inc. respectfully submits that the public interest, convenience, and necessity would be furthered by a grant of this Application.

Respectfully submitted,

/s/_____

Russell M. Blau
Morgan, Lewis & Bockius LLP
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Washington, DC 20004
Tel: (202) 373-6035
Fax: (202) 739-3001
Email: russell.blau@morganlewis.com

September 20, 2019

CERTIFICATION OF APPLICANT

The undersigned hereby certifies, on behalf of GE Flight Efficiency Services, Inc. (“GE Flight”), with respect to the foregoing application for section 214 authority to provide international services, that:


1. GE Flight 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. GE Flight 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. GE Flight 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.

GE Flight Efficiency Services, Inc.

By: 
Name: Raghu Seshadri
Title: Senior Counsel
Date: September 20, 2019