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

| In the Matter of |) |
|-------------------------------------|----------------------------------|
| Fiducia Holdings LLC d/b/a Telesero |) |
| Application Under Section 214 |) File No. ITC 214-20200316-0004 |
| Of the Communication Act of 1934, |) |
| As Amended, for Global Authority | |
| For Provision of Global or Limited |) |
| Global Resale Authority |) |
| - |) |
| Between the U.S. and Various |) |
| International Points |) |

APPLICATION

Fiducia Holdings LLC d/b/a Telesero ("Telesero" or "Applicant"), by its attorneys and pursuant to Section 214 of the Communications Act of 1934, as amended ("the Act"). 47 U.S.C. 214, 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. 47 C.F.R. 63.18(e)(2). Telesero has no affiliation with any foreign carrier in any of the destination countries for which authority is requested nor is Telesero affiliated with any dominant U.S. carrier whose services Telesero may resell. Thus, pursuant to Section 63.10(a)(1) of the Commission's Rules, 47 C.F.R. 63.10(a)(1), Telesero should be classified as a non-dominant carrier in its provision of international service on all routes. Furthermore, as explained herein, this Application is entitled to streamlined processing under Section 63.12 of the Commission's Rules, 47 C.F.R. 63.12. Telesero's counsel has electronically paid the \$1,195.00 filing fee in support of this application.

In support of its request for authority, Telesero submits the following information pursuant to Section 63.18 of the Commission's Rules, 47 C.F.R. 63.18:

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

Fiducia Holdings LLC d/b/a Telesero 1 South Clinton Avenue #2207 Rochester, NY 14604 Tel: 646-866-9220

- (b) Telesero is a corporation organized under the laws of the state of New York.
- (c) Correspondence concerning this Application should be addressed to:

Craig D. Dingwall, Esq.
Dingwall Law Group PLLC
1030 15th Street, NW, B1-#157
Washington, DC 20005
cddingwall@outlook.com
703-862-3353

- (d) Telesero has not previously received Section 214 authority from the Commission.
- (e) Telesero is applying for authority to operate as a resale carrier pursuant to the terms and conditions of Section 63.18(e)(2) of the Commission's Rules. 47 C.F.R. 63(e)(2). Telesero requests authority to serve all countries permitted under a grant of global authority. As evidenced by the certification provided in Attachment A, Telesero 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.
- (f) At this time, Applicant does not seek authority to provide services not referenced under paragraph (e) of Section 63.18 of the Commission's Rules. 47 C.F.R. 63.18(e).
- (g) Telesero will use previously authorized facilities to provide the services requested by the Application. Consequently, Telesero is categorically excluded from environmental assessment pursuant to Section 1.1306 of the Commission's Rules. 47 C.F.R. 1.1306.
- (h) Telesero is One Hundred percent (100%) owned by Billy Shaheen, a U.S. citizen whose business is U.S. International telecom sales. Mr./Ms. Shaheen's address is 1 S. Clinton Ave #2207 Rochester NY 14604.
- (i) As evidenced by the certification attached hereto as Attachment A, Telesero is not affiliated with a foreign carrier.
- (j) As evidenced by the certification attached hereto as Attachment A, Telesero does not seek to provide international telecommunications service to any destination where: (1) Telesero is a foreign carrier in that country; (2) Telesero controls a foreign carrier in that country; (3) any entity that owns more than a 25% interest in Telesero, or controls Telesero, controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% of Telesero and are parties to, or the beneficiaries of, a contractual relationship that affects the provision of marketing of international basic telecommunications services in the United States.

- (k) Not applicable: Telesero is not affiliated or otherwise related to any foreign carrier on any of the routes which Telesero proposed to provide service in this Application.
- (l) Not applicable: Telesero is not a foreign carrier and is not affiliated with a foreign carrier on any of the routes it proposes to resell international telecommunications service.
- (m) Not applicable: Telesero is not affiliated with any foreign carrier on any of the routes it proposes to provide services.
- (n) As evidenced by the certification provided in Attachment A, Telesero has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route 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 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.
- (p) Telesero respectfully requests streamlined processing of this Application pursuant to Section 63.12 of the Commission's Rules, 47 C.F.R. 63.12. This Application qualifies for streamlined processing for the following reasons: (1) Telesero is not affiliated with a foreign carrier on any route for which authority is sought; (2) Telesero is not affiliated with any dominant U.S. carrier whose international switched or private line services it seeks to resell; and (3) Telesero is not requesting authority to provide switched service over private lines to countries not previously authorized for service by the Commission.

Wherefore, Telesero 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,

Fiducia Holdings LLC d/b/a Telesero

Billy Shaheen

1 South Clinton Avenue

#2207

Rochester, NY 14604

646-866-9220

Date: March 19, 2020

ATTACHMENT A

| In the Matter of |) | |
|-------------------------------------|---|----------------------------------|
| |) | |
| Fiducia Holdings LLC d/b/a Telesero |) | |
| |) | |
| Application Under Section 214 |) | File No. ITC-214-202000316-00042 |
| Of the Communication Act of 1934, |) | |
| As Amended, for Global Authority |) | |
| |) | |
| For Provision of Global or Limited |) | |
| Global Resale Authority |) | |
| |) | |
| Between the U.S. and Various |) | |
| International Points |) | |

CERTIFICATE

The undersigned hereby certifies, on behalf of Fiducia Holdings LLC d/b/a Telesero ("Telesero") with respect to the foregoing application for authority to provide international services that:

- 1. Telesero is not affiliated with any foreign carrier in an of the countries to which Telesero proposes to provide service in the foregoing application.
- 2. Telesero will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules, 47 CFR 63.21-.23.
- 3. Telesero does not seek to provide international telecommunications service to any destination where: (1) Telesero is a foreign carrier in that country; (2) Telesero controls a foreign carrier in that country; (3) any entity that owns more than a 25% interest in Telesero, or controls Telesero, controls a foreign carrier int hat country; or (4) two or more parties own, in the aggregate, more than 25% of Telesero and are parties to, or the beneficiaries of, a contractual relationship that affects that provision or marketing of international basic telecommunications services in the United States.

- 4. Telesero 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 aversely in the U.S. market 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)

By: Billy Shaheen, CEO

Fiducia Holdings LLD d/b/a Telesero

Date: 3/19/20