

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

)		
In the Matter of)		
)		
e-Marconi, LLC)		
(FRN 0030341507))		
)		
Application for Global Authority)	File No. ITC-214-2021	_____ - _____
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

e-Marconi, LLC (“e-Marconi” or “Applicant”) hereby requests global or limited global facilities-based and 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

e-Marconi is a corporation formed under the laws of the Commonwealth of Massachusetts with its principal place of business located at 129 Marlborough Street, Boston, MA 02116. e-Marconi does not currently provide any telecommunications services. Neither e-Marconi 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 e-Marconi 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. e-Marconi 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

e-Marconi 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:

e-Marconi, LLC
129 Marlborough Street
Boston, MA 02116
Tel: (617) 821-3190

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

- (c) Correspondence concerning this application should be sent to Applicant's legal counsel:

William B. Wilhelm, Jr.
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, N.W.
Washington, DC 20004
Tel: (202) 739-3000
E-mail: william.wilhelm@morganlewis.com

with a copy to:

Steve Dorsey, Chief Development Officer
e-Marconi, LLC
129 Marlborough Street

Boston, MA 02116
Tel: (267) 664-8532
E-mail:sdorsey@e-marconi.com

- (d) e-Marconi has not previously received authority under Section 214 of the Act.
- (e) e-Marconi requests global Section 214 authority to operate as a facilities-based and resale carrier pursuant to Sections 63.18(e)(1) and (2) of the Commission's rules. e-Marconi 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, 63.22 and 63.23 of the Commission's Rules.
- (f) e-Marconi seeks Section 214 authorization to provide only the services referenced under paragraphs (e)(1) and (e)(2) of Section 63.18 of the Commission's Rules.
- (g) e-Marconi is seeking facilities-based authority under paragraph (e)(3) of Section 63.18 of the Commission's Rules.
- (h) e-Marconi is 100% owned and controlled by Stephen Brodeur and no other person or entity controls 10% or more of its stock. No other person or entity directly or indirectly owns at least 10% percent of the equity of the Applicant. e-Marconi does not have any interlocking directorates with a foreign carrier. The name, address, citizenship and principal business of the aforementioned owner in e-Marconi's ownership chain is as follows:

Name: Stephen Brodeur, Sole Member
Address: 129 Marlborough Street, Boston, MA 02116
Citizenship: United States
Principal Business: Telecommunications and Investment
- (i) e-Marconi 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); and e-Marconi 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) e-Marconi 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) e-Marconi 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). e-Marconi 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) e-Marconi 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 e-Marconi will not enter into such agreements in the future.
- (o) e-Marconi 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 e-Marconi nor its owners are 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, e-Marconi, LLC respectfully submits that the public interest, convenience, and necessity would be furthered by a grant of this Application for authority to operate as an international Section 214 license holder.

Respectfully submitted,



William B. Wilhelm, Jr.
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, N.W.
Washington, DC 20004
Tel: (202) 739-3000
Fax: (202) 739-3001
Email: william.wilhelm@morganlewis.com

January 25, 2021

CERTIFICATION OF APPLICANT

The undersigned hereby certifies, on behalf of e-Marconi, LLC with respect to the foregoing application for section 214 authority to provide international services, that:

1. e-Marconi 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.

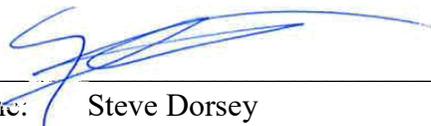
2. e-Marconi has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future.

3. e-Marconi 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.

e-Marconi, LLC

By: _____


Name: Steve Dorsey
Title: Chief Development Officer
Date: January 25, 2021