

SWIDLER BERLIN SHER

Streamlined ITC-AMD-19981102-00770  
RCN TELECOM SERVICES, INC.  
JEFF FRIEDMAN, LLP

WASHINGTON OFFICE  
3000 K STREET, NW, SUITE 300  
WASHINGTON, DC 20007-5116  
TELEPHONE (202) 424-7500  
FACSIMILE (202) 424-7647

NEW YORK OFFICE  
919 THIRD AVENUE  
NEW YORK, NY 10022-9998  
TELEPHONE (212) 758-9500  
FACSIMILE (212) 758-9526

November 2, 1998

**VIA COURIER**

Federal Communications Commission  
International Bureau Telecommunications Division  
445 12<sup>th</sup> Street, S.W.  
12<sup>th</sup> Street Lobby  
TW-A325  
Washington, DC 20554

RECEIVED  
NOV - 2 1998  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Attention: Troy Tanner, Chief, Policy and Facilities Branch, International Bureau


Re: Amendment to Application of RCN Telecom Services, Inc., on behalf of its subsidiaries, RCN Telecom Services of Arizona, Inc., RCN Telecom Services of California, Inc., RCN Telecom Services of Nevada, Inc. and all Future Wholly Owned U.S. Subsidiaries, for Global Authority Pursuant to Section 214 of the Communications Act of 1934, As Amended, to Operate as International Facilities-based Carriers and as International Resale Carriers, File No. ITC-214-19981002-00679

Dear Sir or Madam:

Enclosed for filing with the Commission are an original and six (6) copies of the amendment to the above-referenced application requesting global authority on behalf of, and in order to enable, certain of RCN Telecom Services, Inc.'s subsidiaries to operate as international facilities-based carriers and international resale carriers between the United States and various international points pursuant to Section 214 of the Communications Act of 1934, as amended.

Please date-stamp the extra copy of this filing and return it in the enclosed self-addressed, stamped envelope. Any questions regarding the enclosed filing should be addressed to the undersigned.

Respectfully submitted,

  
Jean L. Kiddoo  
Kathy L. Cooper  
Rachel D. Flam

Counsel for RCN Telecom Services, Inc.

Enclosures

cc: Douglas A. Klein (FCC)

257752.1





Applicant amends the Application to also request such authority on behalf of its subsidiaries, RCN Telecom Services of Connecticut, Inc. (RCN-CT), RCN Telecom Services of Maine, Inc. (“RCN-ME”), RCN Telecom Services of New Hampshire, Inc. (“RCN-NH”), RCN Telecom Services of Rhode Island, Inc. (“RCN-RI”), RCN Telecom Services of Southeast New York, Inc. d/b/a RCN of Southeast New York (“RCN-SENY”), and RCN Telecom Services of Vermont, Inc. (“RCN-VT”) (collectively, and together with RCN-AZ, RCN-CA, RCN-NV and all future wholly owned U.S. subsidiaries of RCN Telecom Services, Inc., the “Subsidiaries”). Applicant further clarifies that, as used in the Application and herein, the term “future” wholly owned U.S. Subsidiaries of Applicant is intended to refer to any wholly-owned subsidiary of Applicant, whether currently existing or formed in the future, which is formed under the laws of any State of the United States and which does not, as of the date of the grant of the Application, have “global” authority pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214 (1982), and Section 63.18 of the Commission’s Rules, 47 C.F.R. § 63.18 (1996), to provide international telecommunications services between the United States and international points (other than those excluded by the Exclusion List, where applicable).

Finally, Applicant hereby respectfully requests that the Commission clarify which entities will actually be authorized to provide the services for which authority is sought in the Application and herein, should the Commission ultimately grant the Application. Applicant’s request stems from its concern that the recently released FCC Public Notice reflecting acceptance of the Application for streamlined processing may create some confusion in this regard. Specifically, Applicant is concerned that the formatting of the entry describing the Application may create the false impression that RCN Telecom Services, Inc. is requesting authority on its own behalf, inasmuch as RCN

Telecom Services, Inc. is listed at the top, center of the entry and the entry, further, refers to RCN-AZ, RCN-CA and RCN-NV as “other” companies. Applicant also notes that no reference is made in that Public Notice to RCN Telecom Services, Inc.’s future wholly-owned subsidiaries. (For the Commission’s convenience, Applicant attaches hereto, as Exhibit A, a copy of the subject Public Notice.) Applicant is concerned that a similar presentation in the FCC Public Notice ultimately granting the Application may well cause confusion as to which entities actually have been granted authority.<sup>17</sup> Accordingly, and at staff’s suggestion, Applicant is including herewith, at Exhibit B, model language that the Commission may wish to use to clarify this matter at the time of the grant of the Application and even before, should the Commission also wish to clarify the matter by way of Correction in an upcoming Public Notice.

**Information Required under Section 63.18**

In support of Applicant’s request that the Application be amended to request authority on behalf of several additional Subsidiaries, Applicant provides the following information required by Section 63.18 of the Commission’s Rules for such newly added Subsidiaries:

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<sup>17</sup> As stated in the Application, RCN Telecom Services, Inc. already has “global” Section 214 authority to operate as an international facilities-based and resale carrier. *See Application of RCN Telecom Services, Inc., RCN Telecom Services of Delaware, Inc., RCN Telecom Services of New Jersey, Inc., d/b/a RCN of New Jersey, RCN Telecom Services of Maryland, Inc., d/b/a RCN of Maryland, RCN Telecom Services of Virginia, Inc., RCN Telecom Services of Washington D.C., Inc. for Global Authority Pursuant to Section 214 of the Communication Act of 1934, as amended, to Operate as Facilities- Based and Resale Carriers*, File No. ITC-97-425 (effective September 5, 1997). Accordingly, Applicant is not, by either the original Application or this amendment, seeking authority on its own behalf but, instead, on behalf of each of the Subsidiaries, individually. Counsel styled the Application as one by RCN Telecom Services, Inc. on behalf of the Subsidiaries at the suggestion of Commission staff.



- (a) Name, address and telephone number:
- RCN Telecom Services of Connecticut, Inc.  
105 Carnegie Center  
Princeton, N.J. 08540  
(609) 734-7500
- RCN Telecom Services of Maine, Inc.  
105 Carnegie Center  
Princeton, N.J. 08540  
(609) 734-7500
- RCN Telecom Services of New Hampshire, Inc.  
105 Carnegie Center  
Princeton, N.J. 08540  
(609) 734-7500
- RCN Telecom Services of Rhode Island, Inc.  
105 Carnegie Center  
Princeton, N.J. 08540  
(609) 734-7500
- RCN Telecom Services of Southeast New York, Inc.  
d/b/a RCN of Southeast New York  
105 Carnegie Center  
Princeton, N.J. 08540  
(609) 734-7500
- RCN Telecom Services of Vermont, Inc.  
105 Carnegie Center  
Princeton, N.J. 08540  
(609) 734-7500
- (b) RCN-CT, RCN-ME, RCN-NH, RCN-RI, RCN-SENY and RCN-VT are organized under the laws of the States of Connecticut, Maine, New Hampshire, Rhode Island, New York and Vermont, respectively.
- (c) (Same as in Application)
- (d) Upon grant of this application, each of RCN-CT, RCN-ME, RCN-NH, RCN-RI, RCN-SENY and RCN-VT will become authorized non-dominant facilities-based carriers and resellers with global authority, subject to Section 214 of the Communications Act of 1934, as amended, and the Commission's Rules. Each of

the Subsidiaries lacks the market power that would allow it to control prices to the detriment of market competition.

- (e) Applicant hereby requests, on behalf of each of the Subsidiaries, four types of authority, all of which are eligible for streamlined processing.<sup>2/</sup> Specifically, on behalf of each of the Subsidiaries, Applicant requests: (1) global facilities-based authority pursuant to Section 63.18(e)(1) of the FCC's Rules, 47 C.F.R. § 63.18(e)(1), to acquire interests in United States-authorized facilities as well as necessary connecting facilities to provide international telecommunications services between the United States and all international points except those countries excluded by the Exclusion List;<sup>3/</sup> (2) global authority pursuant to Section 63.18(e)(2) of the FCC's Rules, 47 C.F.R. § 63.18(e)(2), to resell the international switched services of all United States-authorized carriers, other than those affiliated carriers with market power on a particular route, to provide international switched services between the United States and all international points served by those carriers; (3) global authority pursuant to Section 63.18(e)(2) of the FCC's rules, 47 C.F.R. § 63.18(e)(2), to resell international private lines to provide international non-interconnected private line services between the United States and all international points; and (4) authority pursuant to Section 63.18(e)(2) of the FCC's Rules, 47 C.F.R. § 63.18(e)(2), to resell international private lines interconnected to the public switched network ("PSN") at one or both ends to provide international switched services on all international routes on which the Commission permits such services to be provided.<sup>4/</sup>

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<sup>2/</sup> See *Streamlining the International 214 Authorization Process and Tariff Requirements*, IB Docket No. 95-118, FCC 96-79 (released March 13, 1996) (adopting streamlined 35-day processing procedures for certain international resale applications) ("Streamlining Order"); 47 C.F.R. § 63.12 (1996); see also *Rules and Policies on Foreign Market Participation in the U.S. Telecommunications Market*, IB Docket 97-142, *Report and Order on Reconsideration*, FCC 97-398 at ¶¶ 21, 322-29 (rel. Nov. 27, 1997) ("*Foreign Market Participation Order*").

<sup>3/</sup> Applicant seeks for the Subsidiaries only authority to own circuits on facilities not excluded by the Exclusion List.

<sup>4/</sup> The FCC will automatically amend all Section 214 authorizations to permit carriers to resell international private lines to provide international switched services between the United States and other countries as provision of such services becomes permitted by the Commission. See *Streamlining Order* at ¶ 34. Cf. *Foreign Market Participation Order* at ¶¶ 29-86 (declaring that, upon the effective date of the Commission's new rules, carriers reselling international private lines interconnected to the public switched network to provide international switched services between the U.S. and WTO Member countries will no longer have to meet the equivalency test if settlement rates for at least 50 percent of the U.S.-billed traffic on the route or routes in question are at or below the relevant benchmark posted in the Commission's *Benchmarks Order*). Cf. also *International* (continued...)



- (f) Applicant seeks, for the Subsidiaries, authority to provide only services referenced under paragraph (e) of Section 63.18 of the Commission's Rules.
- (g) The authority requested in this application is categorically excluded from environmental processing as defined by Section 1.1306 of the Commission's Rules, 47 C.F.R. § 1.1306. As such, an environmental assessment is not required for purposes of this application and is therefore not attached.
- (h) Each of RCN-CT, RCN-ME, RCN-NH, RCN-RI, RCN-SENY and RCN-VT certifies that they are not affiliated with any dominant United States carriers whose facilities-based services they propose to resell.

RCN-CT, RCN-ME, RCN-NH, RCN-RI, RCN-SENY and RCN-VT, like the Subsidiaries identified in the Application, are indirectly affiliated with Megacable, S.A. de C.V. ("Megacable"), a corporation in Mexico that provides cable television in twenty two (22) Mexican cities. Megacable is partly owned by RCN International Holdings, Inc., a wholly owned subsidiary of RCN Corporation, an indirect parent of the Applicant and the Subsidiaries. On August 18, 1997, Megacable received authorization from the Mexican authorities to provide local telephone service in Mexico City, Guadalajara, and Monterey. Currently, Megacable does not provide facilities-based local telephone service in Mexico, nor does it currently provide international services. Although Megacable does plan to offer facilities-based local exchange services in the near future, Megacable is a non-dominant carrier that does not now, and will not in the future, control bottleneck services or facilities in Mexico. Accordingly, Megacable does not have, nor will it have, the ability to discriminate against unaffiliated United States international carriers through control of bottleneck facilities in Mexico.<sup>5/</sup>

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<sup>4/</sup> (...continued)  
*Settlement Rates*, IB Docket 96-261, *Report and Order*, FCC 97-280 (rel. Aug. 18, 1997) ("Benchmarks Order").

<sup>5/</sup> Commission staff has previously considered Megacable's activities in the context of Section 214 global authority applications filed by Starpower Communications, LLC and RCN-BecoCom, LLC. In each case, the applications were processed on a streamlined basis and granted. See *Application of Starpower Communications, LLC for Global Authority Pursuant to Section 214 of the Communications Act of 1934, as amended, to Operate as a Facilities-Based and Resale Carrier*, File No. ITC-98-065 (accepted for streamlined processing Jan. 28, 1998; authorization effective March 4, 1998); *Application of RCN-BecoCom, LLC for Global Authority Pursuant to Section 214 of the Communications Act of 1934, as amended, to Operate as a Facilities-Based and Resale Carrier*, File No. ITC-97-661 (accepted for streamlined processing Nov. 7, 1997; authorization effective Dec. 18, 1997).



An interlocking directorate report applicable also to RCN-CT, RCN-ME, RCN-NH, RCN-RI, RCN-SENY and RCN-VT is appended to the original Application as Attachment A.

The same individuals hold a ten percent (10%) or greater direct or indirect shareholder or other equity interest in the Subsidiaries RCN-CT, RCN-ME, RCN-NH, RCN-RI, RCN-SENY and RCN-VT as identified in the Application as holding a ten percent (10%) or greater direct or indirect shareholder or other equity interest in the Subsidiaries RCN-AZ, RCN-CA, and RCN-NV.


(i) Pursuant to Section 63.18(i) of the Commission's Rules, 47 C.F.R. § 63.18(i), each of RCN-CT, RCN-ME, RCN-NH, RCN-RI, RCN-SENY and RCN-VT certify that they have not agreed to accept nor shall they accept in the future any special concessions, as defined by the Commission's Rules, directly or indirectly from any foreign carrier or administration with respect to traffic or revenue flows between the United States and any foreign country which they are or may be authorized to serve.

(j) None of RCN-CT, RCN-ME, RCN-NH, RCN-RI, RCN-SENY and RCN-VT are subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. A certification pursuant to Section 1.2002 of the Commission's Rules (implementing the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 3301) for each is attached.

(k) For the reasons stated in the original Application, the Application, including this Amendment, is still eligible for streamlined processing.

Respectfully submitted,

By:

  
Jean L. Kiddoo

Kathy L. Cooper

Rachel D. Flann

SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

3000 K Street, N. W., Suite 300

Washington, DC 20007

(202) 424-7790 (tel)

(202) 424-7645 (fax)

Counsel for RCN Telecom Services, Inc.

Dated: November 2, 1998

256467.1



**ATTACHMENT A**

**FCC Public Notice Reflecting Acceptance for Streamlined Processing**

**(Released October 16, 1998)**



# PUBLIC NOTICE

FEDERAL COMMUNICATIONS COMMISSION  
1919 M STREET N.W.  
WASHINGTON D.C. 20554

News media information 202-418-0550  
Fax-On-Demand 202-418-2830; Internet: <http://www.fcc.gov> (or [ftp.fcc.gov](http://ftp.fcc.gov))

Report No. TEL-00018S

Friday, October 16, 1998

**STREAMLINED INTERNATIONAL SECTION 214, CABLE LANDING LICENSE AND SECTION 310(B)(4)  
APPLICATIONS ACCEPTED FOR FILING (Formal Section 63.18 and 1.767)  
APPLICATIONS SUBJECT TO STREAMLINED PROCESSING**

The applications listed below have been found, upon initial review, to be acceptable for filing and subject to the streamlined processing procedures set forth in Section 63.12 of the Commission's Rules, 47 C.F.R. Section 63.12. These applications are for authority (1) under Section 214 of the Communications Act: (a) to transfer control of or assign the authorization of a carrier; (b) to be a facilities-based carrier; and/or (c) to resell the switched services of other common carriers to provide international switched telecommunications services between the United States and international points; and/or (d) to resell the private line services of other common carriers to provide: (i) non-interconnected international private line services between the United States and international points, and/or (ii) switched services to a country for which the Commission has authorized the provision of switched services over private lines; or (2) under Section 310(b)(4) of the Communications Act, to exceed the 25 percent foreign ownership benchmark.

Pursuant to Section 63.12 of the rules, the applications listed above will be granted 35 days after the date of this public notice [see Section 1.4 (b) (4)], and the applicant may commence operations on the 36th day, unless the application is formally opposed within the meaning of Section 63.12 (c)(4) or the Commission has informed the applicant in writing, within 28 days of the date of this public notice, that the application, on further examination, has been deemed ineligible for streamlined processing. In these instances, the application will be acted upon only by formal written order of the Commission, and operation may not commence except in accordance with such order.

Unless otherwise specified, interested parties may file comments with respect to these applications within 21 days of the date of this public notice. It is requested that such comments refer to the application file number shown above. Copies of the applications are available for public inspection in Room 102, 2000 M St., N.W. All applications listed are subject to further consideration and review, and may be returned and/or dismissed if not found to be in accordance with the Commission's Rules, Regulations, and other requirements.

FTC-214-19980930-00683

APPLIED GLOBAL TECHNOLOGIES, INC.

International Telecommunications Certificate

Global Resale Service

Application for authority to provide service in accordance with the provisions of Section 63.18(e)(2) of the rules.

FTC-214-19981001-00682

NORTH AMERICAN TELECOMMUNICATIONS LIMITED

International Telecommunications Certificate

Limited Global Facilities-Based/Global Resale Service

Application for authority to operate as a facilities-based carrier in accordance with the provisions of Section 63.18(e)(1) of the rules and also to provide service in accordance with the provisions of Section 63.18(e)(2) of the rules between the United States and Ireland. Applicant certifies that it will comply with the dominant carrier regulations adopted in the Foreign Participation Order.



**ITC-214-19981001-00688** GLOBALNETWORKPARTNERS, LLC  
International Telecommunications Certificate  
Global Facilities-Based/Global Resale Service  
Application for authority to operate as a facilities-based carrier in accordance with the provisions of Section 63.18(e)(1) of the rules and also to provide service in accordance with the provisions of Section 63.18(e)(2) of the rules.

**ITC-214-19981002-00678** MKY TELECOMMUNICATIONS USA, INC.  
International Telecommunications Certificate  
Limited Global Facilities-Based/Global Resale Service  
Application for authority to operate as a facilities-based carrier in accordance with the provisions of Section 63.18(e)(1) of the rules and also to provide service in accordance with the provisions of Section 63.18(e)(2) of the rules.

**ITC-214-19981002-00679** RCN TELECOM SERVICES, INC.  
International Telecommunications Certificate  
Global Facilities-Based/Global Resale Service  
**Other Companies:**  
RCN TELECOM SERVICES OF ARIZONA, INC., RCN TELECOM SERVICES OF CALIFORNIA, INC., RCN TELECOM SERVICES OF NEVADA, INC.  
Application for authority to operate as a facilities-based carrier in accordance with the provisions of Section 63.18(e)(1) of the rules and also to provide service in accordance with the provisions of Section 63.18(e)(2) of the rules.

**ITC-214-19981005-00677** COLUMBIA TELECOMMUNICATIONS, INC. (d/b/a AXESSA )  
International Telecommunications Certificate  
Global Facilities-Based Service  
Application for authority to operate as a facilities based carrier in accordance with the provisions of Section 63.18(e)(1) of the rules.

**ITC-214-19981005-00680** SINGAPORE TELECOM USA, INC.  
International Telecommunications Certificate  
Limited Global Facilities-Based/Global Resale Service  
Application for authority to operate as a facilities-based carrier in accordance with the provisions of Section 63.18(e)(1) of the rules and also to provide service in accordance with the provisions of Section 63.18(e)(2) of the rules between the United States and all international points except Singapore, Australia, Thailand, Sri Lanka, Hong Kong, the United Kingdom, and the Philippines.

**ITC-214-19981005-00681** SINGAPORE TELECOM USA, INC.  
International Telecommunications Certificate  
Limited Global Facilities-Based/Global Resale Service  
Application for authority to operate as a facilities-based carrier in accordance with the provisions of Section 63.18(e)(1) of the rules and also to provide service in accordance with the provisions of Section 63.18(e)(2) of the rules between the United States and all affiliated markets under Section 63.18(e)(6) of the rules in the Philippines.

**ITC-214-19981005-00686** MILLE  
International Telecommunications Certificate  
Global Resale Service  
Application for authority to provide service in accordance with the provisions of Section 63.18(e)(1) of the rules.

**ITC-214-19981007-00687** SAMSUN  
International Telecommunications Certificate  
Global Resale Service  
Application for authority to provide service in accordance with the provisions of Section 63.18(e)(1) of the rules.



ITC-214-19981008-00685

PATHFINDER TELECOM INTERNATIONAL LTD.

International Telecommunications Certificate

Global Facilities-Based/Global Resale Service

Application for authority to operate as a facilities-based carrier in accordance with the provisions of Section 63.18(e)(1) of the rules and also to provide service in accordance with the provisions of Section 63.18(e)(2) of the rules.

ITC-T/C-19980922-00673

PREFERRED CARRIER SERVICES, INC.

Transfer of Control

**FROM:** PREFERRED CARRIER SERVICES, INC.

**TO:** PHONES FOR ALL, INC.

Application for Consent to Transfer Control of Preferred Carrier Services, Inc. to Phones For All, Inc (f/k/a Phones For All, LLC).

ITC-T/C-19981001-00684

METRACOM CORPORATION

Transfer of Control

**FROM:** METRACOM CORPORATION

**TO:** UNIDIAL HOLDINGS, INC.

Application for Consent to Transfer Control of Metracom Corporation to Unidial Holdings, Inc.

**REMINDER:**

Applicants must certify that neither the applicant nor any party to the application is subject to a denial of federal benefits by Federal and/or state courts under authority granted in 21 U.S.C.

The Commission recently amended its Part 63 rules in IB Docket No. 97-142, Rules and Policies on Foreign Participation in the U.S. Telecommunications Market, FCC 97-398, rel. Nov. 26, 1997, 62 Fed. Reg. 64,741 (Dec. 9, 1997); 63 Fed. Reg. 5743 (Feb. 4, 1998) (Foreign Participation Order). Applicants are advised to review the new rules, which became effective February 9, 1998. These rules are contained in Appendix C to the Commission's order and published in the Federal Register. The rules adopted in the Foreign Participation Order amended many of the rules adopted in Streamlining the International Section 214 Authorization Process and Tariff Requirements, 11 FCC Rcd 12884 (61 Fed. Reg. 15724) (Streamlining Order) and Market Entry and Regulation of Foreign-affiliated Entities, Report and Order, 11 FCC Rcd 3873 (1995) (60 Fed. Reg. 67332) (Foreign Carrier Entry Order). An applicant's failure to disclose required information could constitute grounds for denial of authorization or, in certain circumstances, result in fines and forfeitures. Copies of the Commission's new rules can be obtained from our records duplication contractor: ITS, Inc., 1231 20th Street, N.W., Washington, D.C. 20036, (202) 857-3800. The Foreign Participation Order is available as a text file at <http://www.fcc.gov/Bureaus/International/Orders/fcc97398.pdf>. It is available as a WordPerfect document at <http://www.fcc.gov/Bureaus/International/Orders/fcc97398.zip>. The Streamlining Order is also available as a text file at <http://www.fcc.gov/Bureaus/International/Orders/fcc96079.txt>. It is available as a WordPerfect document at <http://www.fcc.gov/Bureaus/International/Orders/fcc96079.wp>. The Foreign Carrier Entry Order is available as a text file at <http://www.fcc.gov/Bureaus/International/Orders/fcc95475.txt>. It is available as a WordPerfect document at <http://www.fcc.gov/Bureaus/International/Orders/fcc95475.wp>.

Copies of the above referenced applications may be obtained from the International Bureau Reference Center, Room 102, 2000 M Street, N.W., Washington, D.C. 20554, (202) 418-1492 or (202) 418-1493.



ATTACHMENT B

MODEL LANGUAGE

I. PUBLIC NOTICE GRANTING AUTHORITY

RCN TELECOM SERVICES OF ARIZONA, INC.

ITC-214-19981002-00679

International Telecommunications Certificates  
Global Facilities-Based /Global Resale Service

Other Companies:

RCN TELECOM SERVICES OF CALIFORNIA, INC., RCN TELECOM SERVICES OF NEVADA, INC., RCN TELECOM SERVICES OF CONNECTICUT, INC., RCN TELECOM SERVICES OF MAINE, INC., RCN TELECOM SERVICES OF NEW HAMPSHIRE, INC., RCN TELECOM SERVICES OF RHODE ISLAND, INC., RCN TELECOM SERVICES OF SOUTHEAST NEW YORK, INC. D/B/ARCN OF SOUTHEAST NEW YORK, RCN TELECOM SERVICES OF VERMONT, INC., AND ALL FUTURE WHOLLY OWNED U.S. SUBSIDIARIES OF RCN TELECOM SERVICES, INC.

Application for authority to operate as a facilities-based carrier in accordance with the provisions of Section 63.18(e)(1) of the rules and also to provide service in accordance with the provisions of Section 63.18(e)(2) of the rules.

II. PUBLIC NOTICE REFLECTING APPLICATIONS SUBJECT  
TO STREAMLINED PROCESSING

CORRECTION

ITC-214-19981002-00679

RCN TELECOM SERVICES OF ARIZONA, INC., RCN TELECOM SERVICES OF CALIFORNIA, INC., RCN TELECOM SERVICES OF NEVADA, INC., AND ALL FUTURE WHOLLY OWNED SUBSIDIARIES OF RCN TELECOM SERVICES, INC.

ITC-214-19981002-00679 is amended to add RCN Telecom Services of Connecticut, Inc., RCN Telecom Services of Maine, Inc., RCN Telecom Services of New Hampshire, Inc., RCN Telecom Services of Rhode Island, Inc., RCN Telecom Services of Southeast New York, Inc. d/b/a RCN of Southeast New York and RCN Telecom Services of Vermont, Inc. to the list of subsidiaries on behalf of which RCN Telecom Services, Inc. seeks authority to permit each to operate as a facilities-based carrier in accordance with the provisions of Section 63.18(e)(1) of the rules and also to provide service in accordance with the provisions of Section 63.18(e)(2) of the rules. We also clarify that the application is for authority for each of the companies identified herein except RCN Telecom Services, Inc., which has been previously granted such authority.

CERTIFICATION OF APPLICANT

On behalf of RCN Telecom Services of Connecticut, Inc., and in accordance with Section 1.2001-1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-1.2003, I hereby certify that no party to the application, including this Amendment, is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. See 21 U.S.C. § 853a. I also hereby certify that the statements in the foregoing Amendment are true, complete, and correct to the best of my knowledge and are made in good faith.

RCN Telecom Services of Connecticut, Inc. has not agreed to accept nor shall it accept in the future any special concessions, as defined by the Commission's Rules, directly or indirectly from any foreign carrier or administration with respect to traffic or revenue flows on 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.

RCN TELECOM SERVICES OF CONNECTICUT, INC.

By:



Name:

Michael J. Mahoney

Title:

President

Date:

October 29, 1998



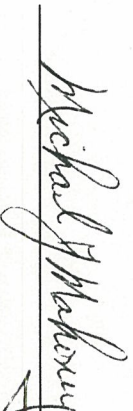
CERTIFICATION OF APPLICANT

On behalf of RCN Telecom Services of Maine, Inc., and in accordance with Section 1.2001-1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-1.2003, I hereby certify that no party to the application, including this Amendment, is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. See 21 U.S.C. § 853a. I also hereby certify that the statements in the foregoing Amendment are true, complete, and correct to the best of my knowledge and are made in good faith.

RCN Telecom Services of Maine, Inc. has not agreed to accept nor shall it accept in the future any special concessions, as defined by the Commission's Rules, directly or indirectly from any foreign carrier or administration with respect to traffic or revenue flows on 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.

RCN TELECOM SERVICES OF MAINE, INC.

By:



Name:

Michael J. Mahoney

Title:

President

Date:


October 29, 1998

CERTIFICATION OF APPLICANT

On behalf of RCN Telecom Services of New Hampshire, Inc., and in accordance with Section 1.2001-1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-1.2003, I hereby certify that no party to the application, including this Amendment, is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. See 21 U.S.C. § 853a. I also hereby certify that the statements in the foregoing Amendment are true, complete, and correct to the best of my knowledge and are made in good faith.

RCN Telecom Services of New Hampshire, Inc. has not agreed to accept nor shall it accept in the future any special concessions, as defined by the Commission's Rules, directly or indirectly from any foreign carrier or administration with respect to traffic or revenue flows on 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.

RCN TELECOM SERVICES OF NEW HAMPSHIRE, INC.

By:   
Name: Michael J. Mahoney  
Title: President  
Date: October 29, 1998




CERTIFICATION OF APPLICANT

On behalf of RCN Telecom Services of Rhode Island, Inc., and in accordance with Section 1.2001-1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-1.2003, I hereby certify that no party to the application, including this Amendment, is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. See 21 U.S.C. § 853a. I also hereby certify that the statements in the foregoing Amendment are true, complete, and correct to the best of my knowledge and are made in good faith.

RCN Telecom Services of Rhode Island, Inc. has not agreed to accept nor shall it accept in the future any special concessions, as defined by the Commission's Rules, directly or indirectly from any foreign carrier or administration with respect to traffic or revenue flows on 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.

RCN TELECOM SERVICES OF RHODE ISLAND, INC.

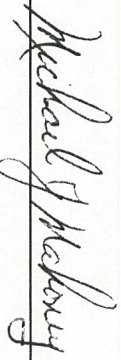
By:   
Name: Michael J. Mahoney  
Title: President  
Date: October 29, 1998

**CERTIFICATION OF APPLICANT**

On behalf of RCN Telecom Services of Southeast New York, Inc. (d.b.a. RCN of Southeast New York), and in accordance with Section 1.2001-1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-1.2003, I hereby certify that no party to the application, including this Amendment, is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. See 21 U.S.C. § 853a. I also hereby certify that the statements in the foregoing Amendment are true, complete, and correct to the best of my knowledge and are made in good faith.

RCN Telecom Services of Southeast New York, Inc. has not agreed to accept nor shall it accept in the future any special concessions, as defined by the Commission's Rules, directly or indirectly from any foreign carrier or administration with respect to traffic or revenue flows on 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.

**RCN TELECOM SERVICES OF SOUTHEAST  
NEW YORK, INC.**

By: 

Name: Michael J. Mahoney

Title: President

Date: October 29, 1998




CERTIFICATION OF APPLICANT

On behalf of RCN Telecom Services of Vermont, Inc., and in accordance with Section 1.2001-1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-1.2003, I hereby certify that no party to the application, including this Amendment, is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. See 21 U.S.C. § 853a. I also hereby certify that the statements in the foregoing Amendment are true, complete, and correct to the best of my knowledge and are made in good faith.

RCN Telecom Services of Vermont, Inc. has not agreed to accept nor shall it accept in the future any special concessions, as defined by the Commission's Rules, directly or indirectly from any foreign carrier or administration with respect to traffic or revenue flows on 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.

RCN TELECOM SERVICES OF VERMONT, INC.

By:



Name:

Michael J. Mahoney

Title:

President

Date:

October 29, 1998