

**Categories of Services for 214 Applications**  
**(Streamline/Non-streamline)**

- ASSIGNMENT OF LICENSE**
- GLOBAL FACILITIES-BASED SERVICE**
- GLOBAL FACILITIES-BASED/GLOBAL RESALE SERVICE**
- GLOBAL RESALE SERVICE**
- INDIVIDUAL FACILITIES-BASED SERVICE**
- INTERCONNECTED PRIVATE LINE RESALE SERVICE**
- LIMITED GLOBAL FACILITIES-BASED SERVICE/LIMITED GLOBAL RESALE SERVICE**
- LIMITED GLOBAL FACILITIES-BASED SERVICE**
- LIMITED GLOBAL RESALE SERVICE**
- INMARSAT AND MOBILE SATELLITE SERVICE**
- SWITCHED RESALE SERVICE**
- TRANSFER OF CONTROL**
- SUBMARINE CABLE LANDING LICENSE**
- INTERNATIONAL SPECIAL PROJECT**

**Description of Application:** \_\_\_\_\_

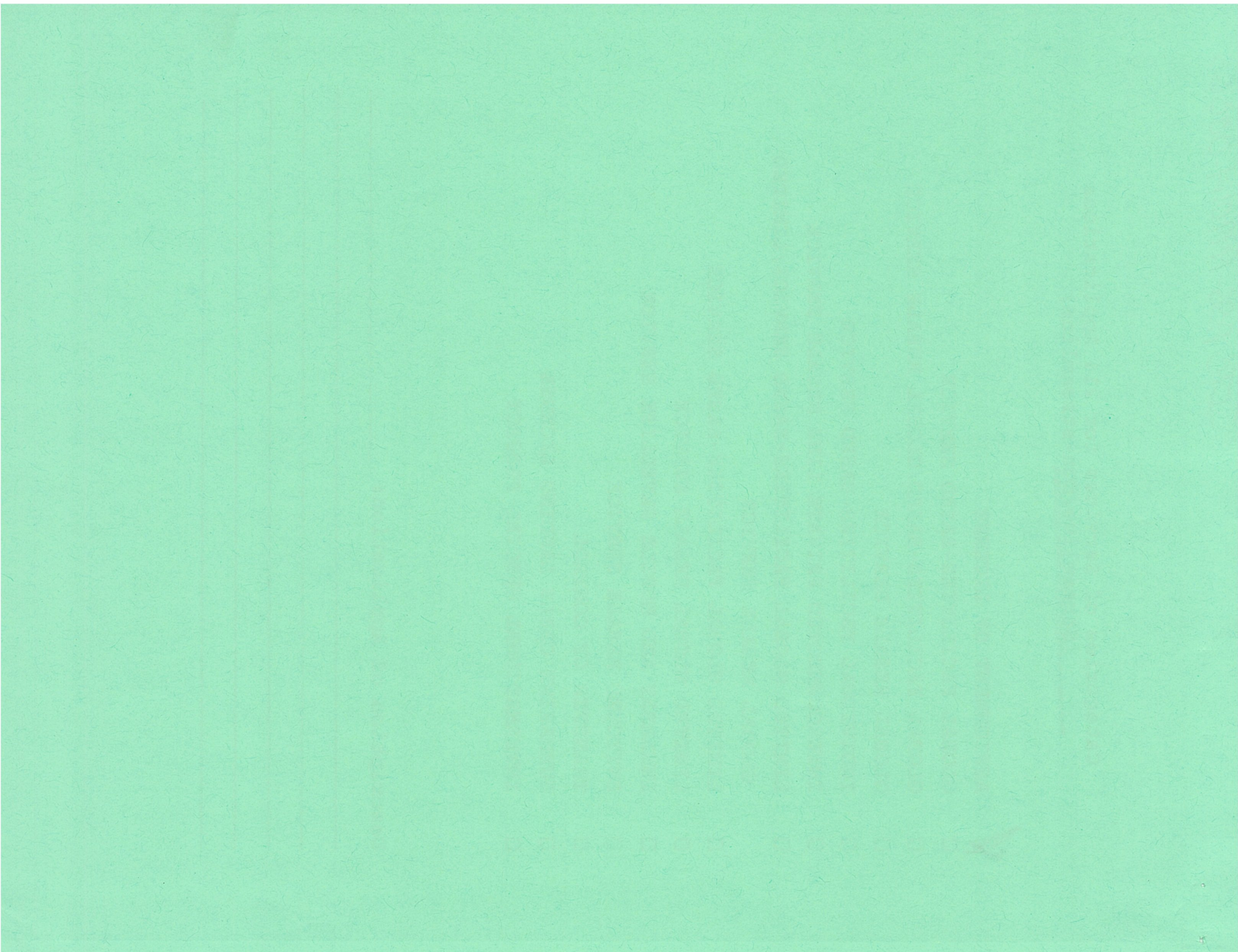
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READ INSTRUCTIONS CAREFULLY  
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION

APPROVED BY OMB 3060-0589

REMITTANCE ADVICE

PAGE NO. 1 OF 1 **JAN 14 1999**

(1) LOCKBOX # **358115**

SPECIAL USE  
FCC USE ONLY

SECTION A - PAYER INFORMATION

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card)  
**Nelinx Telecommunications Corporation**

(3) TOTAL AMOUNT PAID (dollars and cents)

**780.00**

(4) STREET ADDRESS LINE NO. 1

**6069 Old Canton Road, #251**

(5) STREET ADDRESS LINE NO. 2

(6) CITY  
**Jackson**

(7) STATE  
**MS**

(8) ZIP CODE  
**39211**

(9) DAYTIME TELEPHONE NUMBER (include area code)  
**(601) 977-0033**

(10) COUNTRY CODE (if not in U.S.A.)

**IF PAYER NAME AND THE APPLICANT NAME ARE DIFFERENT, COMPLETE SECTION B  
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C)**

SECTION B - APPLICANT INFORMATION

(11) APPLICANT NAME (if paying by credit card, enter name exactly as it appears on your card)

(12) STREET ADDRESS LINE NO. 1

(13) STREET ADDRESS LINE NO. 2

(14) CITY

(15) STATE

(16) ZIP CODE

(17) DAYTIME TELEPHONE NUMBER (include area code)

(18) COUNTRY CODE (if not in U.S.A.)

**COPY**

**COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEETS (FORM 159-C)**

SECTION C - PAYMENT INFORMATION

(19A) FCC CALL SIGN/OTHER ID	(20A) PAYMENT TYPE CODE (PTC)	(21A) QUANTITY	(22A) FEE DUE FOR (PTC) IN BLOCK 20A	FCC USE ONLY
	<b>C U T</b>	<b>01</b>	<b>\$ 780.00</b>	

(23A) FCC CODE 1

(24A) FCC CODE 2

(19B) FCC CALL SIGN/OTHER ID	(20B) PAYMENT TYPE CODE (PTC)	(21B) QUANTITY	(22B) FEE DUE FOR (PTC) IN BLOCK 20B	FCC USE ONLY
			<b>\$</b>	

(23B) FCC CODE 1

(24B) FCC CODE 2

(19C) FCC CALL SIGN/OTHER ID	(20C) PAYMENT TYPE CODE (PTC)	(21C) QUANTITY	(22C) FEE DUE FOR (PTC) IN BLOCK 20C	FCC USE ONLY
			<b>\$</b>	

(23C) FCC CODE 1

(24C) FCC CODE 2

(19D) FCC CALL SIGN/OTHER ID	(20D) PAYMENT TYPE CODE (PTC)	(21D) QUANTITY	(22D) FEE DUE FOR (PTC) IN BLOCK 20D	FCC USE ONLY
			<b>\$</b>	

(23D) FCC CODE 1

(24D) FCC CODE 2

SECTION D - TAXPAYER INFORMATION (REQUIRED)

(25) PAYER TIN 

0	6	4	0	9	0	3	2	3	6
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(26) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-11 IS DIFFERENT FROM PAYER NAME IN A-2  
APPLICANT TIN 

0									
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(27) CERTIFICATION STATEMENT

I, \_\_\_\_\_ (PRINT NAME), Certify under penalty of perjury that the foregoing and supporting information are true and correct to the best of my knowledge, information and belief. SIGNATURE \_\_\_\_\_

SECTION F - CREDIT CARD PAYMENT INFORMATION

(28) MASTERCARD/VISA ACCOUNT NUMBER

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EXPIRATION DATE:

MONTH	YEAR		

VISA

AUTHORIZED SIGNATURE

DATE

I hereby authorize the FCC to charge my VISA or MASTERCARD for the service(s)/authorization(s) herein described.

SEE PUBLIC BURDEN ESTIMATE ON REVERSE

FCC FORM 159 JULY 1997 (REVISED)



**IRWIN, CAMPBELL & TANNENWALD, P.C.**

ATTORNEYS AT LAW  
1730 RHODE ISLAND AVENUE, N.W.  
SUITE 200  
WASHINGTON, D.C. 20036-3101  
(202) 728-0400  
FAX (202) 728-0354

ELIZABETH S. HOULTON  
(202) 728-0401 Ext. 111

January 13, 1999

**VIA FEDERAL EXPRESS**

Federal Communications Commission  
IB Telecommunications Division  
P.O. Box 358115  
Pittsburgh, PA 15251-5115

Re: NetLinx Telecommunications Corporation  
Application for Section 214 Authority

Dear Sir or Madam:

Transmitted herewith on behalf of NetLinx Telecommunications Corporation ("NTC") is an application to assign its authority *nunc pro tunc* under Section 214 of the Communications Act, as amended, to NetLinx Telecommunications, LLC. NTC is currently authorized to provide global international resale communications services between the United States and international points for its customers. The attached application meets the requirements of Section 63.12 of the Commission's rules and thus is eligible for streamlined processing.

A check made payable to the FCC in the amount of \$780.00 is enclosed to cover the required filing fee.

Please date stamp the enclosed file copy and return it in the enclosed self-addressed stamped envelope.

If you have any questions, please contact the undersigned.

Very truly yours,

  
Elizabeth S. Houlton

Enclosures



NETLINX TELECOMMUNICATIONS CORPORATION  
6069 OLD CANTON ROAD, #251  
JACKSON, MS 39211

UNION PLANTERS BANK OF MISSISSIPPI  
JACKSON, MS  
85-590/653

70614

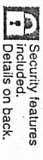
1/8/99

PAY TO THE ORDER OF ECC

\*\*780.00 \$

Seven Hundred Eighty and 00/100\*\*\*\*\*

DOLLARS



FCC

MEMO Pro Forma Filing Fee

⑈070814⑈ ⑆065305902⑈ 1500023898⑈

MP





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

In the Matter of )  
 )  
 )  
NETLINX TELECOMMUNICATIONS ) ITC 99-  
CORPORATION )  
 )  
 )  
Application to Assign Authority of an )  
Authorized International Resale Carrier )  
Under Section 214 of the Communications )  
Act of 1934, as Amended )

APPLICATION TO ASSIGN SECTION 214 AUTHORITY  
OF AN AUTHORIZED INTERNATIONAL RESALE CARRIER

NetLinx Telecommunications Corporation (“NTC”), which was authorized to provide global international resale communications services on December 3, 1997 (ITC-97-627), hereby respectfully requests, pursuant to Section 214 of the Communications Act of 1934, as amended (“Act”), 47 U.S.C. § 214, and Section 63.18 of the Commission’s Rules, 47 C.F.R. § 63.18, authority *nunc pro tunc* to assign its Section 214 authorization to NetLinx Telecommunications, LLC. The instant application meets the requirements of 47 C.F.R. § 63.12 and thus is eligible for streamlined processing.

**I. BACKGROUND**

NTC was granted global authority to provide international resale communications services on December 3, 1997 (ITC-97-627). At that time, NTC was incorporated under the laws of the State of Florida and had its headquarters in Miami. Its President was Mr. Robert de Gouveia and ownership of the stock of the corporation was split equally between Mr. de Gouveia, Mr. Steven Gallegos and Mr. Nicky Shelton.

Since that time, for tax and other business reasons, the company was restructured as a limited liability company organized under the laws of the State of Delaware on or about October 21, 1998. The new company name is NetLinx Telecommunications, LLC (“NTLLC”) and its



headquarters are now located in Jackson, Mississippi. Mr. de Gouveia and Mr. Shelton no longer hold an ownership interest in the company. NTLLC has two members, Mr. Gallegos (who formerly owned one-third of NTC) and Ms. Patricia Shelton, who share equal economic and management interests in the entity. Critical, time-sensitive business and corporate considerations mandated that the transfer be consummated before filing this application. Thus, NTC and NTLLC respectfully request *nunc pro tunc* approval of the assignment.

In its earlier application for global resale authority under Section 214, NTC proposed to enter the business of providing international switched communications services (including voice, facsimile and data) through the resale of existing international common carrier services. NTC had no foreign affiliations then, and likewise, NTLLC does not after the transition have any such affiliations.

As proposed in NTC's original application for authority, NTLLC will continue to obtain the requisite capacity from its underlying carrier(s) to provide international telecommunications services between the United States and international points. Through the new ownership structure, as under the old structure, NTLLC will compete with other carriers that already provide international telecommunications services to overseas points by reselling the service over existing international facilities. By granting this application, the Commission will serve the public interest, convenience and necessity by continuing to promote competition in the international services market. The Commission has already found the provision of international resale services by NTC to be in the public interest through its earlier 214 application. NTLLC will be providing the same services in the international telecommunications marketplace that it provided prior to the corporate restructuring after the restructuring and such provision of service under the new structure should enhance NTLLC's ability to offer competitively priced services. Thus, the public interest will be served by the grant of consent to the assignment of NTC's Section 214 authority to NTLLC.



## II. SECTION 63.18 SHOWING

In support of this request for consent to the assignment, the following information is submitted pursuant to Section 63.18 of the Commission's Rules:

- (a) Name, address and telephone number of assignee:  
NetLinx Telecommunications, LLC  
6069 Old Canton Road, #251  
Jackson, MS 39211  
(601) 977-0033

- (b) NTLLC is a limited liability company organized under the laws of the State of Delaware. NTC is a corporation organized and existing under the laws of the State of Florida.

- (c) All correspondence concerning this application should be directed to:  
Mr. Steven P. Gallegos  
NetLinx Telecommunications, LLC  
6069 Old Canton Road, #251  
Jackson, MS 39211  
(601) 977-0033

with a copy to:

David A. Irwin, Esq.  
Elizabeth S. Houlton, Esq.  
Irwin, Campbell & Tannenwald, P.C.  
1730 Rhode Island Ave., N.W., Suite 200  
Washington, D.C. 20036  
(202) 728-0400

- (d) NTC has received authority previously under Section 214 of the Communications Act, as described above, to provide international resold telecommunications services pursuant to Section 63.18(e)(2) of the Commission's rules. NTLLC has not previously received international authority under Section 214 to provide any telecommunications services.



- (e) This application does not seek to expand or modify NTC's existing Section 214 global resale authority in any way. The parties only seek Commission approval of the assignment of NTC's business to NTLLOC.
- (f) At this time, NTLLOC seeks no other authorization available under Section 63.18(e).
- (g) Not applicable, as the applicants do not seek facilities-based authority or to alter NTC's existing international resale authority.
- (h) As NTC has certified in the past, NTLLOC hereby certifies that it is not affiliated with any foreign or U.S. facilities-based carrier. In support of this certification, NTLLOC has provided as Exhibit A the name, address, citizenship and principal business of its 10 percent or greater equity holders and have identified any interlocking directorates. NTLLOC further certifies that it has no affiliation with the underlying carrier(s) whose services it is currently or intends in the future to resell (either directly or indirectly through the resale of another reseller's service) in the instant application.
- (i) NTLLOC certifies that it has not agreed and will not agree in the future to accept any direct or indirect special concessions from a foreign carrier or administration with regard to traffic or revenue flows between the United States and any foreign countries that NTC is authorized to serve.
- (j) NTC and NTLLOC each certify that no party to this application has been denied, individually or jointly, any federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.





### III. CONCLUSION

For the reasons set forth above, NTC and NTLLC respectfully request that the Commission grant the authority *nunc pro tunc* to assign the authority granted to NTC under Section 214 of the Communications Act to provide resold switched communications services, including voice, facsimile and data, between the United States, Hawaii, Puerto Rico and the U.S. Virgin Islands and various international points, to NTLLC.


Respectfully submitted,

NETLINX TELECOMMUNICATIONS  
CORPORATION

By:   
Steven P. Gallegos, Vice President

NETLINX TELECOMMUNICATIONS, LLC

By:   
Steven P. Gallegos, Member

By:   
David A. Irwin, Esq.  
Elizabeth S. Houlton  
Counsel

IRWIN, CAMPBELL & TANNENWALD, P.C.  
1730 Rhode Island Ave., N.W., Suite 200  
Washington, D.C. 20036-3101  
(202) 728-0400 (phone)  
(202) 728-0354 (fax)

Dated: 1/13/99



EXHIBIT A

**10 Percent or Greater Shareholders or Other Equity Holders**

Prior to the corporate restructuring, the following persons owned NTC in equal shares:

<u>Name</u>	<u>Address</u>	<u>Citizenship</u>	<u>Principal Business</u>
Roland de Gouveia	2550 NW 72nd Avenue	South Africa <sup>1</sup>	SoFlo Internet Services NetLinx
Steve Gallegos	6069 Old Canton Rd., #251 Jackson, MS 39211	USA	NetLinx
Nicky Shelton	6069 Old Canton Rd., #251 Jackson, MS 39211	USA	NetLinx

After the restructuring, the following members own NTLIC in equal shares:

<u>Name</u>	<u>Address</u>	<u>Citizenship</u>	<u>Principal Business</u>
Steve Gallegos	6069 Old Canton Rd. Jackson, MS 39211	USA	NetLinx
Patricia Shelton	6069 Old Canton Jackson, MS 39211	USA	NetLinx

**Directors**

None

**Interlocking Directorates**

None

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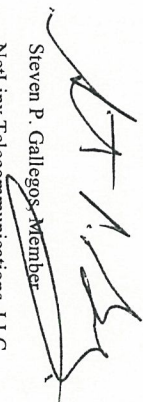
<sup>1</sup> Mr. de Gouveia is a South African citizen who resides legally in the United States pursuant to a green card from the U.S. Immigration and Naturalization Service. He neither owns nor is affiliated with any telecommunications provider in South Africa.



CERTIFICATION

To the best of my knowledge and belief, all of the statements made in this application are true and correct.

I hereby certify that NetLinx Telecommunications, LLC, has never been denied federal benefits pursuant to Section 53.01 of the Anti-Drug Abuse Act of 1988.

  
Steven P. Gallegos ~~Member~~  
NetLinx Telecommunications, LLC

Dated: 1-11-99



**CERTIFICATION**

To the best of my knowledge and belief, all of the statements made in this application are true and correct.

I hereby certify that NetLinx Telecommunications Corporation has never been denied federal benefits pursuant to Section 53.01 of the Anti-Drug Abuse Act of 1988.



Steven P. Gallegos, Vice President  
NetLinx Telecommunications Corporation

Dated: 1-11-99

