

CLIFFORD
CHANGE
ROGERS

CLIFFORD CHANGE
ROGERS & WELLS LLP

W E L Granted
Telecommunications Division

80 FOURTEENTH STREET NW
WASHINGTON DC 20005 2018
TEL +1 202 434 0700
FAX +1 202 434 0800
www.cliffordchange.com

date: OCT 17 2000

authorized by
INTERNATIONAL BUREAU

George Kleinfield
DIRECT TEL +1 202 434 0865
DIRECT FAX +1 202 434 0488
george.kleinfield@cliffordchange.com

Expire: April 29, 2001

signature Deputy Chief, Telecom, Div.

RECEIVED
OCT 25 2000
Telecom Division
International Bureau

October 18, 2000

By Federal Express

Ms. Magalie Roman Salas
Secretary, Federal Communications Commission
International Bureau
c/o Mellon Bank
Three Mellon Bank Center
525 William Penn Way
27th floor, room 153-2713
Pittsburgh, PA 15259-0001

Streamlined
COMCEPTS, INC.

ITC-STA-200001019-006338

Attention: Wholesale Lock box Shift Supervisor

Re: Request for Special Temporary Authority to Transfer Section 214
License from Concepts, Inc. to New Global Telecom, Inc.

Dear Ms. Salas:

On behalf of applicants New Global Telecom, Inc. ("NGT") and Concepts, Inc. ("Concepts"), and pursuant to section 63.25 of the Commission's rules, 19 C.F.R. 63.25, we request special temporary authority ("STA") to transfer control to NGT of the section 214 license currently held by Concepts.

NGT and Concepts are privately-owned, U.S.-based, non-dominant international carriers that each hold Section 214 authorizations for global facilities-based and resale service.¹ On October 13, 2000, NGT and Concepts filed the attached Section 214

¹ The FCC granted Concepts' Section 214 license by an Order adopted on January 16, 1998 under File Number ITC-97-749. The FCC granted NGT's Section 214 license by an Order adopted on March 7, 1997 under File Number ITC-97-044.

FCC/MELLON

OCT 19 2000

CLIFFORD
CHANGE
ROGERS & WELLS

CLIFFORD CHANGE
ROGERS & WELLS LLP

607 FOURTEENTH STREET NW
WASHINGTON DC 20005 2018

TEL +1 202 434 0700
FAX +1 202 434 0800

www.cliffordchange.com

RECEIVED

OCT 26 2000

George Kleinfield
DIRECT TEL +1 202 434 0865
DIRECT FAX +1 202 434 0488
george.kleinfield@cliffordchange.com

October 18, 2000

By *Federal Express*

Ms. Magalie Roman Salas
Secretary, Federal Communications Commission
International Bureau

RECEIVED

OCT 26 2000

Telecom Division
International Bureau

Three Mellon Bank Center
525 William Penn Way
27th floor, room 153-2713
Pittsburgh, PA 15259-0001

Attention: Wholesale Lock box Shift Supervisor

Re: Request for Special Temporary Authority to Transfer Section 214
License from Concepts, Inc. to New Global Telecom, Inc.

Dear Ms. Salas:

On behalf of applicants New Global Telecom, Inc. ("NGT") and Concepts, Inc. ("Concepts"), and pursuant to section 63.25 of the Commission's rules, 19 C.F.R. 63.25, we request special temporary authority ("STA") to transfer control to NGT of the section 214 license currently held by Concepts.

NGT and Concepts are privately-owned, U.S.-based, non-dominant international carriers that each hold Section 214 authorizations for global facilities-based and resale service.¹ On October 13, 2000, NGT and Concepts filed the attached Section 214

¹ The FCC granted Concepts' Section 214 license by an Order adopted on January 16, 1998 under File Number ITC-97-749. The FCC granted NGT's Section 214 license by an Order adopted on March 7, 1997 under File Number ITC-97-044.

application, in connection with a planned acquisition by NGT of 100% ownership of Concepts in a transaction that was scheduled to close on November 17, 2000.

Although the attached application is eligible for streamlined processing, urgent and previously unforeseen circumstances have arisen that now require an acceleration of the closing date for this acquisition. Concepts has experienced a cash flow deficit that has now intensified into a crisis for the company. The rapid deterioration in Concepts' financial condition may force it into insolvency by the end of this month unless the acquisition by NGT can occur first. If the closing does not occur by October 31, Concepts may go out of business and thereby prevent the acquisition from going forward at all.

In its notice of June 8, 2000, DA 00-1252, the International Bureau noted that "under the Communications Act . . . the Commission may grant an STA if it finds that there are extraordinary circumstances requiring temporary operations in the public interest and that delay in the institution of such temporary operations would seriously prejudice the public interest."

NGT and Concepts require an STA not for reasons of "convenience to the applicant" or "marketing considerations" or other reasons deemed inadequate in the above-cited notice, but in order to prevent a further deterioration in Concepts' financial position that could result in its insolvency and closure prior to the acquisition's currently scheduled closing date. Grant of an STA under these urgent circumstances will serve the public interest, convenience, and necessity by enabling the acquisition to occur more quickly than the regulations would otherwise permit and thereby avoiding the potential closure of a U.S.-

based competitive international carrier. Additional public interest considerations supporting the acquisition are set forth at page 4 of the attached Section 214 application.

The special temporary authority that we request is only needed for a brief period of time, until the Commission has accepted for filing and posted the attached Section 214 application (filed on October 13, 2000) and the ensuing two-week period for processing of this streamlined application has elapsed under 47 C.F.R. 63.12. In the unlikely event that this Section 214 application is denied, the acquisition agreement would provide for reversal of the acquisition and restoration of control over Concepts' Section 214 license to its current owner.

An original and five copies of this submission are enclosed, accompanied by a completed Form 159 and payment by credit card to the Commission in the amount of \$815. Also enclosed is a separate acknowledgement copy for date-stamping and return to the undersigned counsel for applicants.

Please advise us of any questions you may have regarding this STA request or the attached Section 214 application.

Respectfully submitted



George Kleinfeld

*Attorney for New Global Telecom, Inc.
and Concepts, Inc.*

cc: Justin Connor
International Division

READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE

Approved by OMB
3060-0589
Page No 1 of 1

(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) **CLIFF FORD CHAWLIE HOGGERS JR WELLS** (3) TOTAL AMOUNT PAID (U.S. Dollars and cents) **\$8115.00**

(4) STREET ADDRESS LINE NO. 1 **6071 14TH ST. MOETHEWEST** **PAID BY CREDIT CARD**

(5) STREET ADDRESS LINE NO. 2

(6) CITY **WASHINGTON** (7) STATE **D** (8) ZIP CODE **200005**

(9) DAYTIME TELEPHONE NUMBER (include area code) **202 4340865** (10) COUNTRY CODE (if not in U.S.A.) **USA**

FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED

(11) PAYER (FRN) **0004052411** (12) PAYER (TIN) **135553664**

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

(13) APPLICANT NAME **NEW GLOBAL TELECOM INC.**

(14) STREET ADDRESS LINE NO. 1 **1600 JACKSON STREET**

(15) STREET ADDRESS LINE NO. 2

(16) CITY **GOULDEN** (17) STATE **CO** (18) ZIP CODE **80401**

(19) DAYTIME TELEPHONE NUMBER (include area code) **303 2780700** (20) COUNTRY CODE (if not in U.S.A.) **USA**

FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED

(21) APPLICANT (FRN) **0004052551** (22) APPLICANT (TIN) **880366526**

COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET

(23A) CALL SIGN/OTHER ID **CVT** (24A) PAYMENT TYPE CODE **11**

FCC USE ONLY

(26A) FEE DUE FOR (PTC) **1** (27A) TOTAL FEE **\$8151.00**

FCC USE ONLY

(28A) FCC CODE 1

FCC USE ONLY

(23B) CALL SIGN/OTHER ID

FCC USE ONLY

(26B) FEE DUE FOR (PTC)

FCC USE ONLY

(28B) FCC CODE 1

SECTION D - CERTIFICATION

(30) CERTIFICATION STATEMENT
I, **GERGE KLEINFELD**, certify under penalty of perjury that the foregoing and supporting information is true and correct to the best of my knowledge, information and belief. SIGNATURE *Gerge Kleinfeld* DATE **10/18/00**

SECTION E - CREDIT CARD PAYMENT INFORMATION

ATTACHMENT

**CLIFFORD
CHANGE
ROGERS & WELLS**

**CLIFFORD CHANGE
ROGERS & WELLS LLP**

607 FOURTEENTH STREET NW
WASHINGTON DC 20005 2018

TEL +1 202 434 0700

FAX +1 202 434 0800

www.cliffordchange.com

George Kleinfield
DIRECT TEL +1 202 434 0865
DIRECT FAX +1 202 434 0488
george.kleinfield@cliffordchange.com

RECEIVED

OCT 26 2000

Telecom Division
International Bureau

October 12, 2000

By Federal Express

Ms. Magalie Roman Salas
Secretary, Federal Communications Commission
International Bureau
c/o Mellon Bank
Three Mellon Bank Center
525 William Penn Way
27th Floor, room 153-2713
Pittsburgh, PA 15259-0001

ROGERS WELLS

OCT 13 2000

Attention: Wholesale Lock box Shift Supervisor

Re: Section 214 Application

Dear Ms. Salas:

On behalf of applicants New Global Telecom, Inc. and Comcepts, Inc., the enclosed application and notifications are filed under Section 214 of the Communications Act of 1934, 47 U.S.C. § 214, and Sections 63.10, 63.12 and 63.18 of the Commission's Rules, 47 C.F.R. §§ 63.10, 63.12, 63.18. The applicants seek authorization to transfer control of the Section 214 authorization currently held by Comcepts, Inc. to New Global Telecom, Inc.

An original and five copies of this submission are enclosed, accompanied by a completed Form 159 and a check payable to the Commission in the amount of \$815. Also

enclosed is a separate acknowledgement copy for date-stamping and return to the undersigned counsel for applicants.

Respectfully submitted

OCT 13 2000

FCC/MELLON



George Kleinfeld

*Attorney for New Global Telecom, Inc.
and Concepts, Inc.*

cc: George Li
International Division

RECEIVED

OCT 26 2001

Approved by OMB
3060-0589
Page No 1 of 1

READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING
358115
(1) LOCKBOX #

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE
FCC/International Division

OCT 13 2000

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) **CLIFFORD CHAMBERLAIN RIGGERS & WELLS** (3) TOTAL AMOUNT PAID (U.S. Dollars and cents) **\$8115.10**

(4) STREET ADDRESS LINE NO. 1 **207 14TH STREET WORTHWEST** (7) STATE **DC** (8) ZIP CODE **20005**

(5) STREET ADDRESS LINE NO. 2

(6) CITY **WASHINGTON** (10) COUNTRY CODE (if not in U.S.A.) **USA**

(9) DAYTIME TELEPHONE NUMBER (include area code) **202 434 0865** (12) PAYER (TIN) **135553664**

FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED

(11) PAYER (FRN) **0004052411** (12) PAYER (TIN) **135553664**

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

(13) APPLICANT NAME **NEW GLOBAL TELECOM INC**

(14) STREET ADDRESS LINE NO. 1 **1600 JACKSON STREET**

(15) STREET ADDRESS LINE NO. 2

(16) CITY **GOLDEN** (17) STATE **CO** (18) ZIP CODE **80401**

(19) DAYTIME TELEPHONE NUMBER (include area code) **303 278 6700** (20) COUNTRY CODE (if not in U.S.A.) **USA**

FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED

(21) APPLICANT (FRN) **0004052551** (22) APPLICANT (TIN) **9803665261**

COMPLETE SECTION C FOR EACH SERVICE. IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET

(23A) CALL SIGN/OTHER ID **CIUT** (24A) PAYMENT TYPE CODE **11**

(26A) FEE DUE FOR (PTC) **T** (27A) TOTAL FEE **\$8115.00** FCC USE ONLY

(28A) FCC CODE 1 **1** (29A) FCC CODE 2

(23B) CALL SIGN/OTHER ID **CIUT** (24B) PAYMENT TYPE CODE **11**

(26B) FEE DUE FOR (PTC) **T** (27B) TOTAL FEE **\$8115.00** FCC USE ONLY

(28B) FCC CODE 1 **1** (29B) FCC CODE 2

SECTION D - CERTIFICATION

(30) CERTIFICATION STATEMENT
I, **GEORGE KLEINFELD**, certify under penalty of perjury that the foregoing and supporting information is true and correct to the best of my knowledge, information and belief.

SIGNATURE *George Kleinfeld* DATE **10/19/00**

SECTION E - CREDIT CARD PAYMENT INFORMATION

(31) MASTERCARD VISA

MASTER CARD/VISA ACCOUNT NUMBER:

EXPIRATION

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

SIGNATURE DATE

12491

| DATE | DESCRIPTION | AMOUNT |
|---------|--|--------|
| 10/4/00 | Filing fees for form FCC 159- New Global Telecom | 815.00 |

DETACH before depositing check

**CLIFFORD CHANCE
ROGERS & WELLS LLP**
607 FOURTEENTH STREET N.W. WASHINGTON, D.C. 20005-2018

15-7011/2540

12491

VENDOR NO. CHECK DATE

| | |
|-------|---------|
| 42329 | 10/4/00 |
|-------|---------|

CITIBANK, F.S.B
WASHINGTON, DC 20006

PAY Eight hundred fifteen and 00/100 - - - - DOLLARS \$ 815.00

TO THE
ORDER OF FEDERAL COMMUNICATIONS COMMISSION

CLIFFORD CHANCE ROGERS & WELLS LLP

MC Gray

PARTNER

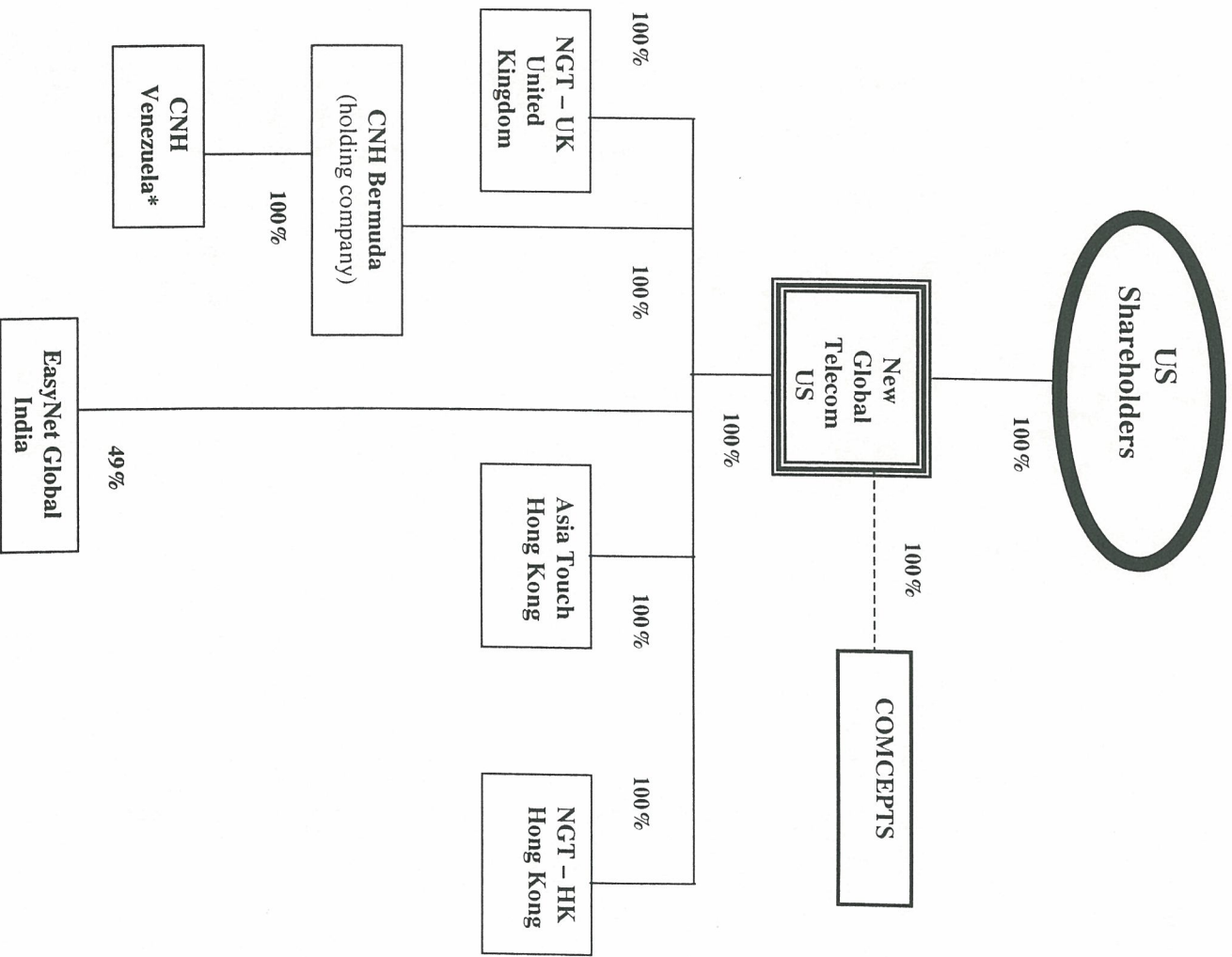
⑈012491⑈ ⑆254070116⑆ ⑆3700 4972⑈

January 16, 1998 under File Number ITC-97-749. Concepts currently provides service to Russia and the Ukraine, but has no foreign carrier affiliations in either country.

The transferee, New Global Telecom, is a privately-owned company incorporated under the laws of Delaware. It too is an international facilities-based telecommunications operator, providing voice and data telecommunications services under a Section 214 authorization for global facilities-based and resale service, which the FCC granted by an Order adopted on March 7, 1997 under File Number ITC-97-044. NGT currently provides no service to Russia or Ukraine and has no affiliations in those two countries.

A chart depicting the equity relationships between the transferor, transferee and their principal owners, as well as any affiliated foreign carriers, as they will exist after closing of the pending Share Purchase Agreement, appears on the following page.

NEW GLOBAL TELECOM, INC FOREIGN SUBSIDIARY ORGANIZATIONAL CHART



* CNH Venezuela is a carrier in its own right and will also acquire control shortly over a Venezuelan non-dominant wireless carrier, Comunicazione Centurione, S.A.

2 **PROPOSED TRANSACTION NARRATIVE**

On August 15, 2000, New Global Telecom, formally offered to purchase the entire issued and to be issued share capital of Concepts. The scheduled closing date of the Offer is November 17, 2000.

3 **PUBLIC INTEREST CONSIDERATIONS**

Concepts and New Global Telecom respectfully submit that the Commission's approval of this request for transfer of control will serve the public interest, convenience and necessity. This transaction involves no disruption of service to any customer of Concepts. This transaction will not reduce or impair present or potential U.S. competitive opportunities and will instead facilitate the provision of services between and among non-dominant carriers, particularly for services between the United States and Eastern Europe.

4 **INFORMATION REQUIRED BY COMMISSION RULES, 47 C.F.R. § 68.18**

4.1 Transferor - Concepts

(a) The name, address, and telephone number of each applicant;

Name: Concepts, Inc.

Address: 6927 Old Seward Highway, Suite 200, Anchorage, Alaska 99518

Telephone: 907-349-0002

(b) The Government, State, or Territory under the laws of which each corporate or partnership applicant is organized;

Concepts is organized under the laws of Alaska. Its date of incorporation was

February 26, 1997.

(c) The name, title, post office address, and telephone number of the officer and any other contact point, such as legal counsel, to whom correspondence concerning the application is to be addressed;

Legal Counsel: Clifford Chance Roger & Wells LLP
attn: George Kleinfeld
607 Fourteenth Street, N.W.,
Washington, D.C. 20005-2018
Tel: 202 434 0865
Fax: 202 434 0800

(d) A statement as to whether the applicant has previously received authority under Section 214 of the Act and, if so, a general description of the categories of facilities and services authorized (i.e., authorized to provide international switched services on a facilities basis);

Concepts holds a Section 214 global authorization to provide international facilities-based telecommunications services and private line telecommunications services on a resale basis, by an Order adopted on January 16, 1998 under File Number ITC-97-749.

4.2 Transferee - New Global Telecom

(a) The name, address, and telephone number of each applicant;

Name: New Global Telecom, Inc.
Address: 1600 Jackson Street, Golden, CO 80401
Telephone: 303 239-1045

(b) The Government, State, or Territory under the laws of which each corporate or partnership applicant is organized;

New Global Telecom is organized under the laws of Delaware. Its date of incorporation was September 17, 1997.

(c) The name, title, post office address, and telephone number of the officer and any other contact point, such as legal counsel, to whom correspondence concerning the application is to be addressed;

Legal Counsel: Clifford Chance Roger & Wells LLP
attn: George Kleinfeld
607 Fourteenth Street, N.W.,
Washington, D.C. 20005-2018
Tel: 202 434 0865 Fax: 202 434 0800

(d) A statement as to whether the applicant has previously received authority under Section 214 of the Act and, if so, a general description of the categories of facilities and services authorized (i.e., authorized to provide international switched services on a facilities basis);

New Global Telecom holds a Section 214 global authorization to provide international facilities-based telecommunications services and private line telecommunications services on a resale basis, by an Order adopted on March 7, 1997 under File Number ITC-97-044.

(h) The name, address, citizenship and principal businesses of any person or entity that directly or indirectly owns at least ten percent of the equity of the applicant, and the percentage of equity owned by each of those entities (to the nearest one percent). The applicant shall also identify any interlocking directorates with a foreign carrier.

The following persons/entities have greater than or equal to 10% direct or indirect ownership of the equity in the transferee, New Global Telecom:

(1) **Richard Grange**

Citizenship: United States

Address: 1600 Jackson Street, Golden CO 80401

Principal Business: President of New Global Telecom

Ownership: 25% direct shareholding in New Global Telecom

(2) **Brad Grunewald**

Citizenship: United States

Address: 1600 Jackson Street, Golden, CO 80401

Principal Business: Vice President of New Global Telecom

Ownership: 25% direct shareholding in New Global Telecom

The following interlocking directorates exist between NGT and its affiliated foreign carriers: Richard Grange and Brian Johnson are directors of NGT and are also directors of CNH Communications, Asia Touch, EasyNet Global, and New Global Telecom - HK.

(i) A certification as to whether or not the applicant is, or is affiliated with, a foreign carrier. The certification shall state with specificity each foreign country in which the applicant is, or is affiliated with, a foreign carrier.

Concepts, the transferor, certifies that it is not affiliated with a foreign carrier. New Global Telecom, the transferee, certifies that it is affiliated with foreign carriers. As illustrated by the chart on page 3 of this application, and as hereby certified, the following affiliates of New Global Telecom are foreign carriers in the stated foreign countries:

- (1) New Global Telecom - UK is a foreign carrier operating in the United Kingdom;
- (2) New Global Telecom - HK is a foreign carrier operating in Hong Kong;
- (3) Asia Touch is a foreign carrier operating in Hong Kong;
- (4) CNH Communications is a foreign carrier operating in Venezuela;

(5) EasyNet Global is a foreign carrier operating in India.

(j) A certification as to whether or not the applicant seeks to provide international telecommunications services to any destination country for which any of the following is true. The certification shall state with specificity the foreign carriers and destination countries:

(1) The applicant is a foreign carrier in that country; or

(2) The applicant controls a foreign carrier in that country; or

(3) Any entity that owns more than 25 percent of the applicant, or that controls the applicant, controls a foreign carrier in that country.

(4) Two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of the applicant and are parties to, or the beneficiaries of, a contractual relation (e.g., a joint venture or market alliance) affecting the provision or marketing of international basic telecommunications services in the United States.

It is certified as follows:

By this application, the parties seek approval for a transfer to NGT of the section 214 authorization currently held by Comcepts, in connection with NGT's acquisition of Comcepts. Comcepts provides international telecommunications services to Russia and the Ukraine. Comcepts is not a foreign carrier and has no affiliations with any foreign carriers in those two countries, directly or indirectly, or with foreign carriers in any other country. As listed above, NGT has foreign carrier affiliations in the United Kingdom, Hong Kong, Venezuela and India. NGT will acquire no new foreign carrier affiliations as a result of its acquisition of Comcepts, and therefore will continue to have no foreign carrier affiliations in the two markets served by Comcepts (Russian and Ukraine).

(k) For any destination country listed by the applicant in response to paragraph (j), the applicant shall make one of the following showings:

Not Applicable.

(l) Any applicant that proposes to resell the international switched services of an unaffiliated U.S. carrier for the purpose of providing international telecommunications services to a country where it is a foreign carrier or is affiliated with a foreign carrier shall either provide a showing that would satisfy § 63.10(a)(3) or state that it will file the quarterly traffic reports required by § 43.61(c) of this chapter.

New Global Telecom resells international switched services to Hong Kong, India, Venezuela, and United Kingdom, countries where there is an affiliated foreign carrier present (CNH Communications in Venezuela, EasyNet Global in India, Asia Touch and New Global Telecom-HK in Hong Kong, and New Global Telecom-UK in United Kingdom). All affiliates are non-dominant carriers and no combination of the affiliated foreign carriers listed above have greater than 50% of the market share in the international transport and local access markets in any country in which they operate.

(m) With respect to regulatory classification under § 63.10, any applicant that is or is affiliated with a foreign carrier in a country listed in response to paragraph (l) and that desires to be regulated as non-dominant for the provision of particular international telecommunications services to that country should provide information in its application to demonstrate that it qualifies for non-dominant classification pursuant to § 63.10.

New Global Telecom will not acquire any new affiliations with foreign carriers as a result of its acquisition of Concepts. As shown in answer to question (l) above, none of the foreign carriers with which New Global Telecom is already affiliated have sufficient market power to be able to affect competition in the United States; and as each, or any relevant combination of each, lack 50% of the market share in international transport and the local access markets in their countries of operation, all of them are presumed to be non-dominant.

(n) A certification that the applicant 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 market power on the foreign end of the route and will not enter into such agreements in the future.

It is certified that neither New Global Telecom nor Comcepts have 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 market power on the foreign end of the route, and that neither will enter into such agreements in the future.

(o) A certification pursuant to §§ 1.2001 through 1.2003 of this chapter that no party to the application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. See 21 U.S.C. 853a.

It is certified that neither New Global Telecom nor Comcepts are subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

(p) If the applicant desires streamlined processing pursuant to § 63.12, a statement of how the application qualifies for streamlined processing.

Streamlined processing is requested and is applicable under Section 63.12 of the Commission's Rules, 47 C.F.R. § 63.12.

As a result of the proposed transfer of control, no new affiliations will be created between the acquiring company, NGT, and any foreign carriers, nor does NGT have any current affiliations with any foreign dominant carriers. In addition, the transferor,

Concepts, has no foreign carrier affiliations. New Global Telecom and Concepts therefore fall within Section 63.12(c)(1)(ii) of the Commission's Rules, 47 C.F.R. § 63.12(c)(1)(ii). The acquiring company, NGT, will remain affiliated only with foreign carriers that are non-dominant in accordance with Section 63.10(a)(3) of the Commission's Rules, 47 C.F.R. § 63.10(a)(3).

8. CONCLUSION

The applicants respectfully request that the Commission authorize the transfer described in this submission.

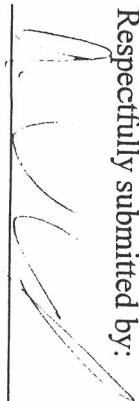
Respectfully submitted by:



Rodger Davis, President
Concepts, Inc.
6927 Old Seward Highway, Suite 200,
Anchorage, Alaska 99518

907/349-0002 Phone
907-349-6335 Fax

Respectfully submitted by:



Ron Wessie
New Global Telecom, Inc.

1600 Jackson Street, Golden, CO 80401