

Attachment 1  
Application for Special Temporary Authority

Response to item 10:

An application was filed with the International Bureau this date for Section 214 authority for Union Telephone Company (“Applicant”) to provide resell international switched telecommunications services. Special Temporary Authority (“STA”) is hereby requested for Applicant to continue uninterrupted service to the public while its application for permanent Section 214 authorization is processed by the Commission.

In a recent review of records Applicant was unable to locate a record of having applied for and received international Section 214 authorization relating to its offering of international services on a resold basis to wireless and landline customers. Likewise a search of the Commission’s public files did not produce a record of such authorization. It appears the need for such authorization was not recognized at the time wireless services commenced in the early 1980s, although it is possible that file copies were lost in the meantime and the Commission’s records are not complete or searchable by the public as to authorizations more than 25 years old. Applicant recognizes the need to provide telecommunications services in full compliance with the Commission’s rules and therefore is filing for Section 214 authorization and STA at this time to be certain that services may be continued to the public on an uninterrupted basis.

Applicant acknowledges that grant of this STA request will not prejudice any action the Commission may take on the underlying application for Commission authorization pursuant to Section 214. Applicant further acknowledges that STA may be revoked by the Commission upon its own motion without a hearing.

Response to item 16:

Applicant is a commercial wireless telecommunications service provider and also a reseller of international and domestic telecommunications services. It has no affiliation with any foreign carrier. Applicant allows customers to complete international calls by means of resale of the facilities of unaffiliated international telecommunications carriers.

With regard to Section 63.18(d) of the Commission’s rules, Applicant has no record of having previously received authority under Section 214 of the Act.

With reference to Section 63.18(e)(3), Applicant is not applying for authority to acquire facilities or to provide services not covered by paragraphs (e)(1) and (e)(2) of Section 63.18.

Section 63.18(g) is also inapplicable because Applicant does not seek facilities-based authority under paragraph (e)(3) of Section 63.18.