Streamlined ITC-T/C-20000727-00498
KDD AMERICA, INC.

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

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

ION 8/30

Description of Application: ______________________________

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READ INSTRUCTIONS CAREFULLY BEFORE PROCEEDING

(1) LOCKBOX # 358115

FEDERAL COMMUNICATIONS COMMISSION

REMITTANCE ADVICE

COPY

PAGE NO. 1 OF 1

FCC/MELLON JUL 27 2000

APPROVED BY OMB 3060-0589

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) Morrison & Foerster LLP		(3) TOTAL AMOUNT PAID (dollars and cents) $ 780.00
(4) STREET ADDRESS LINE NO. 1 2000 Pennsylvania Avenue, N.W., Suite 5500		
(5) STREET ADDRESS LINE NO. 2		
(6) CITY Washington	(7) STATE DC	(8) ZIP CODE 20006
(9) DAYTIME TELEPHONE NUMBER (Include area code) (202) 887-1500	(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) KDD America, Inc.		
(12) STREET ADDRESS LINE NO. 1 375 Park Avenue, 7th Floor		
(13) STREET ADDRESS LINE NO. 2		
(14) CITY New York	(15) STATE NY	(16) ZIP CODE 10152
(17) DAYTIME TELEPHONE NUMBER (Include area code) (212) 702-3720	(18) COUNTRY CODE (if not in U.S.A.)	

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) C U T	(21A) QUANTITY 1	(22A) FEE DUE FOR (PTC) IN BLOCK 20A $ 780.00	FCC USE ONLY
(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 $ 1	FCC USE ONLY
(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
(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
(23D) FCC CODE 1		(24D) FCC CODE 2		

SECTION D - TAXPAYER INFORMATION (REQUIRED)

(25) PAYER TIN 0 9 4 0 6 9 7 2 1 0

(26) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-11 IS DIFFERENT FROM PAYER NAME IN A-2)
APPLICANT TIN 0 1 3 3 5 2 2 6 6 2

SECTION E - CERTIFICATION

(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, infomation and belief. SIGNATURE ______________________

SECTION F - CREDIT CARD PAYMENT INFORMATION

(28)

☐ MASTERCARD MASTERCARD/VISA ACCOUNT NUMBER: ______________________ EXPIRATION DATE: MONTH YEAR

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

MORRISON & FOERSTER LLP

ATTORNEYS AT LAW

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LOS ANGELES
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July 27, 2000

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Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

Re: Application for Commission Consent to Transfer of Control of Section 214 Authorizations of KDD America, Inc. to DDI Corporation

Dear Ms. Salas:

Enclosed for filing on behalf of KDD America, Inc. ("KDD") are an original and five copies of an application seeking Commission consent to the transfer of control of the Section 214 authorizations of KDD to and DDI Corporation. Also enclosed are checks payable to the "FCC" to cover the prescribed filing fees. KDD will submit the original signature pages to the Commission within the next few business days.

Please stamp the enclosed duplicate copy as received and return it for our records in the attached envelope.

Respectfully submitted,

Cheryl A. Tritt
Counsel for KDD America, Inc.

Enclosures

dc-219264

MORRISON & FOERSTER LLP

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

5300052

Vendor Number 017056 Ref #
FEDERAL COMMUNICATIONS COMMISSION

Check Number 5300052
Check Date 07/25/00

INVOICE	DATE	AMOUNT	INVOICE	DATE	AMOUNT
RQ399007	07/25/00	780.00			

Sect. 214 Transfer of Control Filing Fee

$ 780.00

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MORRISON & FOERSTER LLP
WASHINGTON D.C. OFFICE
2000 PENNSYLVANIA AVE. N.W. SUITE 5500
WASHINGTON, D.C. 20006-1888
(202) 887-1500

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ORDER OF
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Patent #5,6

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⑈5300052⑈ ⑆121141822⑆ 73136⑈01356⑈

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

In the Matter of	)	
	)	
KDD AMERICA, INC.	)	
	)	
Application for Authority Under Section 214 of the Communications Act of 1934, as Amended, for Transfer of Control to DDI Corporation	))))	File No. ITC-214-2000_____

APPLICATION FOR TRANSFER OF CONTROL

KDD America, Inc. ("KDDA") and DDI Corporation ("DDI") (collectively, the "Applicants") hereby request authority for transfer of control of the Section 214 authorizations of KDDA to DDI, pursuant to Section 214 of the Communications Act of 1934, as amended ("Communications Act"), 47 U.S.C. § 214, and Section 63.18 of the rules of the Federal Communications Commission ("FCC" or "Commission"), 47 C.F.R. §63.18.[1]

As discussed below, the proposed transfer of control is part of a three-way merger among DDI, KDD Corporation ("KDD"), the parent company of KDDA, and IDO Corporation ("IDO"). Approval of the transfer will permit KDDA and DDI to realize significant revenue enhancements and operating synergies that will enhance their ability to continue providing high quality, low cost telecommunications services and to compete more effectively in the international telecommunications marketplace. Accordingly, grant of this Application will serve the public interest.

[1] Applicants also are filing contemporaneously herewith an application seeking Commission consent to the transfer of control of a cable landing license held by KDDA as well as a notification of foreign carrier affiliation pursuant to Section 63.11 of the Commission's rules.

KDDA currently qualifies for a presumption of nondominance under Section 63.10(a)(3) of the Commission's rules, on all routes except to Japan. As a result of the transfer of control, KDDA will acquire additional affiliations with DDI's foreign carrier affiliates in Brazil, Paraguay, and Australia. All of DDI's affiliates, however, lack sufficient market power to affect competition adversely in the U.S. market. Therefore, KDDA will continue to qualify for a presumption of nondominance on the Brazil, Paraguay and Australia routes.

A DDI-wholly owned subsidiary, DDI Communications America Corporation ("DDICA") also holds a Section 214 authorization to provide global facilities-based and resale services.[2] Following the merger, DDICA will be affiliated with KDD, a foreign carrier and parent company of KDDA. However, as noted in the foreign affiliation notification being filed concurrently, DDICA will accept dominant carrier classification on the U.S.-Japan route without prejudice to its right to petition for reclassification at a later date. Japan, the destination country where KDDA is affiliated with a foreign carrier, is a World Trade Organization ("WTO") member country. Accordingly, the Applicants respectfully request that the Commission apply streamlined processing to consideration of this application pursuant to Section 63.12 of the Commission's rules.

In support of this Application, the Applicants submit the information provided below.

I. The Applicants

A. KDDA

KDDA is a New York corporation providing both facilities-based and resold international telecommunications services to customers in the United States. KDDA is a wholly owned subsidiary of KDD, a provider of international telecommunications services in Japan.

---

[2] *See* FCC Public Notice, ITC-214-19990722-00453, 1999 FCC LEXIS 4059 (Aug. 26, 1999).

B. DDI

DDI is a Japanese corporation providing primarily domestic long distance telephone service in Japan. DDI also provides international telephone service, leased circuit service, and data services such as Internet access and frame relay. Through various subsidiaries, DDI offers cellular service and personal handyphone service ("PHS," or service for telephones that function as cordless units at home and mobile units elsewhere).

C. IDO

Although not a party to this application, IDO is a party to the three-way merger with DDI and KDD. IDO is a Japanese corporation providing cellular service in metropolitan and Tokai areas of Japan.

II. The Proposed Transaction Will Serve the Public Interest

On April 5, 2000, KDD, the ultimate corporate parent of KDDA, IDO Corporation ("IDO"), and DDI executed a Merger Agreement ("Agreement"), whereby each share of DDI will be issued to the shareholders of KDD in exchange for 92.1 shares of KDD and each share of DDI will be issued to the shareholders of IDO in exchange for 2.9 shares of IDO. Upon consummation of the proposed transaction, DDI will own all of the issued and outstanding stock of KDD, which in turn will own all of the issued and outstanding stock of KDDA. DDI also will own all of the issued and outstanding stock of IDO.

The proposed merger will provide additional competition to NTT, Japan's largest telecommunications company, and permit the merged company to offer seamless mobile, domestic, and international telecommunications services in Japan. The proposed merger also will enhance operating efficiencies and competitiveness, thus enabling the merged company to offer world class services and aggressively expand marketing operations to capture the support of a broad customer base ranging from individuals to mega-companies both in Japan and abroad. The proposed merger will enable DDI, KDD, and IDO to respond effectively to the changing Japanese telecommunications market, which is witnessing a rapid shift from voice to data communications and from fixed to mobile communications. In particular, DDI, KDD, and IDO will be able to pool their skills and resources to develop and expand an integrated IP backbone, provide a seamless nationwide mobile telephone service, and become a leading player in developing next-generation mobile communications services.

The proposed transaction will serve the public interest in promoting competition in the United States by permitting KDDA and DDI to compete more effectively through combining their financial resources and complementary services, facilities, and expertise. Specifically, the proposed merger will permit KDDA and DDI to realize significant economic, marketing, and technical service efficiencies that will enhance KDDA's ability to provide high-quality, low-cost, competitive telecommunications services. KDDA and DDI also will benefit significantly from the substantial managerial, technical, and financial expertise of the combined company's management and operations teams. The combined company will offer a full range of services and will provide increased choice to consumers for competitively priced international telecommunications. By enhancing operating efficiencies and expanding their scope of business, KDDA and DDI will be able to offer world-class services and aggressively expand marketing operations to capture the support of a broad customer base ranging from individuals to mega-companies both in the United States and abroad.

Moreover, the proposed transaction will accelerate competition in both the U.S. domestic and international markets without any perceptible increase in market concentration. KDDA provides long distance services to customers in the United States. On the other hand, DDI provides primarily domestic long distance services in Japan, while IDO provides cellular service in Japan. Consequently, the proposed merger will enhance competition, increase consumer choices, and stimulate service and technological innovations without causing increased concentration in any U.S. market segment.

III. Section 63.18 Information

In support of this application, the Applicants submit the following information pursuant to Section 63.18 of the Commission's rules:

(a) Name, address and telephone number of Applicants:

KDD America, Inc.
375 Park Avenue, 7th Floor
New York, New York 10152
(212) 702-3720

DDI Corporation
8, Ichibancho, Chiyoda-ku
Tokyo 102-8401, Japan
(81) 3-3222-0077

(b) KDDA is a corporation organized under the laws of the State of New York. DDI is a corporation organized under the laws of Japan.

(c) Correspondence concerning this Application should be sent to:

For KDDA:

Naoki Kinoto
President and Chief Executive Officer
KDD America, Inc.
375 Park Avenue, 7th Floor
New York, New York 10152
(212) 702-3720 (Tel.)

with a copy to:

Cheryl A. Tritt
Joan E. Neal
Morrison & Foerster LLP
2000 Pennsylvania Avenue, N.W., Suite 5500
Washington, D.C. 20006
(202) 887-1500 (Tel.)

For DDI:

DDI Corporation
Planning and Marketing Division, Global Communications Group
Shiba Koen First Building, 21st Floor
3-8-2 Shiba, Minato-ku
Tokyo 105-8617
Japan
(81) 3-5765-3511 (Tel.)

with a copy to:

Troy F. Tanner
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007-5116
(202) 424-7500 (Tel.)

(d) KDDA holds various Section 214 authorizations, as specified in Exhibit A. DDI Communications America Corporation, a subsidiary of DDI, holds a Section 214 authorization to provide global facilities-based and resale services. *See* FCC Public Notice, ITC-214-19990722-00453, 1999 FCC LEXIS 4059 (Aug. 26, 1999).

(e)(3) Authority is hereby requested to transfer control of the Section 214 authorizations of KDDA from the shareholders of KDD to DDI pursuant to the terms and conditions of Section 63.18(e)(3) of the Commission's rules.

(f) No response is necessary.

(g) Not applicable.

(h) DDI is a publicly held Japanese corporation. Kyocera Corp. ("Kyocera"), a Japanese corporation whose principal business is electronic component, information/telecommunications equipment, and semiconductor parts manufacturing, currently owns 25.16 percent of the equity of DDI and is located at 6 Takeda Tobadono-cho, Fushimi-ku, Kyoto 612-8501, Japan. Following the proposed merger, Kyocera will own 15.3 percent of the equity of DDI, and Toyota Motor Corp. ("Toyota") will own 13.29 percent of the equity of DDI. Toyota is a Japanese corporation whose principal business is manufacturing and sale of automobiles, trucks, and buses, and is located at 1, Toyota-cho, Toyota City, Aichi Prefecture 471-8571, Japan. There are no other shareholders of DDI who directly or indirectly own or will own immediately following the merger 10 percent or more of the equity of DDI.

The following executive officers or directors of DDI hold interlocking executive officer or directorate positions with the following foreign carriers:

Name	**Foreign Carrier**
Kazuo Inamori	Kansai Cellular Telephone Co. ("KCT"), Okinawa Cellular Telephone Co. ("OCT")
Yusai Okuyama	OCT, Tu-ka Cellular Tokyo, Inc. ("Tu-ka Tokyo"), DDI Pocket, Inc. ("Pocket"), Hola Paraguay S.A. ("HP")
Akira Hioki	KCT, Iridium Southeast Asia Co., Ltd. ("ISEA")
Tadashi Onodera	KCT, Kyusyu Cellular Telephone Co. ("QCT"), Chugoku Cellular Telephone Co. ("CCT"), Tohoku Cellular Telephone Co. ("TCT"), Hokkaido Cellular Telephone Co. ("DCT"), OCT, Tu-ka Phone Kansai, Inc. ("Tu-ka Kansai"), Pocket, DDI Engineering Corp. ("DDI Engineering"), Global Telecom S.A. ("GT"), HP
Haruo Taneno	Pocket, DDI Network Systems Co., Ltd. ("DNS")
Masahiro Mino	KCT, Hokuriku Cellular Telephone Co. ("HCT"), DCT, Shikoku Cellular Telephone Co. ("SCT")
Tsuneyoshi Narahara	ISEA, Iridium South Pacific Pty., Ltd. ("ISP")
Ryuichi Kinoshita	Pocket
Nobuhiko Nakano	QCT, CCT, HCT, SCT, Tu-ka Cellular Tokai, Inc. ("Tu-ka Tokai"), DDI Engineering
Kaoru Tachibana	DDI Engineering, DNS
Hiroshi Sakai	CCT, HCT, SCT, OCT, Tu-ka Tokai, Tu-ka Kansai, DDI Engineering
Toshiyuki Morita	Pocket
Hirofumi Morozumi	Pocket

Kiyoshi Sato	TCT, HCT, DCT, SCT, Tu-ka Tokyo, Tu-ka Kansai
Hajime Nomura	ISEA, ISP
Yuji Tsuda	GT
Yuzo Ishikawa	DNS
Yasuo Nishiguchi	Pocket

DDI currently does not have any other interlocking directorate with another foreign carrier.

(i) By Paragraph (1) of the attached certification, DDI certifies that it is a foreign carrier authorized in Japan to provide telecommunications services. In addition, DDI is affiliated with various foreign carriers in Japan, Brazil, Paraguay, and Australia, as identified in Exhibit B.

(j) By Paragraph (2) of the attached certification, DDI certifies that, upon acquisition of KDD and KDDA, DDI (through KDDA) will provide international telecommunications services to Japan, where DDI is a foreign carrier in that country and will control KDD, another foreign carrier in Japan. DDI further certifies that, upon acquisition of KDD and KDDA, DDI (through KDDA), will provide international telecommunications services to Brazil, Paraguay, and Australia, where DDI has an affiliation with a foreign carrier, as described in Section 63.18(j) of the Commission's rules.

(k) Japan, Brazil, Paraguay, and Australia are WTO member countries.

(l) Following the merger, KDDA will continue to accept dominant carrier regulation on the U.S.-Japan route and file the quarterly traffic reports required by Section 43.61(c) of the Commission's rules, without prejudice to the Applicants' right to petition for reclassification at a later date. DDICA will also accept dominant carrier regulation on the U.S.-Japan route and file the quarterly traffic reports required by Section 43.61(c) of the commission's rules, without prejudice to DDICA's right to petition for reclassification at a later date. On routes where KDDA will be affiliated with a foreign carrier -- Brazil, Paraguay, and Australia -- the affiliated foreign carrier satisfies the requirements of Section 63.10(a)(3) of the Commission's rules.

Specifically each such affiliated foreign carrier holds significantly less than a 50 percent market share in the international transport and local access markets in its respective country of operation. None of these carriers has the ability to discriminate against unaffiliated U.S. international carriers through the control of bottleneck services or facilities in any destination country. Accordingly, all such affiliated foreign carriers are presumed to lack sufficient market power on the foreign end of their respective routes to affect competition adversely in the U.S. market.

(m) As stated in subsection (l) above, KDDA qualifies for nondominant classification on the U.S.-Brazil, U.S.-Paraguay, and U.S.-Australia routes pursuant to Section 63.10 of the Commission's rules. In addition, following the merger, KDDA will continue to maintain, and DDICA will accept, dominant carrier regulation on the U.S.-Japan route, without prejudice to the Applicants' and DDICA's right to petition for reclassification at a later date.

(n) By Paragraph (3) of the attached certification, DDI certifies that it 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 or will enter into such agreements in the future.

(o) By Paragraph (4) of the attached certification, DDI certifies that no party to this application is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

(p) The Applicants seek streamlined processing of this application under Section 63.12 of the FCC's Rules because after the proposed transfer of control, as to all routes except the U.S.-Japan, U.S.-Brazil, U.S.-Paraguay, and U.S.-Australia routes, (1) KDDA will not be affiliated with any foreign carrier in a destination market; (2) KDDA will not be affiliated with any dominant U.S. carrier whose international switched or private line services it seeks authority to resell; and (3) KDDA is not seeking authority to provide switched basic services over private lines to a country for which the FCC has not previously authorized the provision of switched services over private lines. With respect to the U.S.-Brazil, U.S.-Paraguay, and U.S.-Australia routes, where KDDA will become affiliated with a foreign carrier on the foreign end, KDDA qualifies for a presumption of nondominance under Section 63.10(a)(3) of the FCC's Rules, as stated in subsections (l) and (m) above. With respect to the U.S.-Japan route, where DDICA will become affiliated with a foreign carrier (i.e., KDD) on the foreign end, Japan is a WTO member country and DDICA agrees to accept dominant carrier classification, subject to the right to petition for reclassification at a later date.

IV. CONCLUSION

Based on the foregoing, Commission approval of the proposed transfer of control of KDDA to DDI will serve the public interest, convenience, and necessity.

Date: 7/27/2000

Respectfully submitted,

KDD AMERICA, INC.

By: ______________________

Naoki Kinoto
President & CEO
375 Park Avenue, 7th Fl
New York, NY 10152

Cheryl A. Tritt
Joan E. Neal
Morrison & Foerster LLP
2000 Pennsylvania Avenue, N.W.
Washington, D.C. 20006-1888

DDI CORPORATION

By: Yusai Okuyama

Yusai Okuyama
President
8, Ichibancho, Chiyoda-ku
Tokyo 102-8401, Japan

Troy F. Tanner
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007-5116

CERTIFICATION

I, Yusai Okuyama, President of DDI Corporation ("DDI"), hereby certify that:

1. DDI is a foreign carrier authorized in Japan to provide telecommunications services. In addition, DDI is affiliated with various foreign carriers in Japan, Brazil, Paraguay, and Australia, as identified in Exhibit B.

2. Upon acquisition of KDD Corporation ("KDD") and KDD America, Inc. ("KDDA"), DDI, through KDDA, seeks to provide international telecommunications services to Japan, where DDI is a foreign carrier in that country and will control KDD, another foreign carrier in Japan. Upon acquisition of KDD and KDDA, DDI, through KDDA, seeks to provide international telecommunications services to Brazil, Paraguay, and Australia, where DDI has an affiliation with a foreign carrier, as described in Section 63.18(j) of the Commission's rules.

3. DDI 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 or will enter into such agreements in the future.

4. **No party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853(a), as amended.**

Yusai Okuyama

Yusai Okuyama

Date: 7/27/2000

EXHIBIT A

SECTION 214 AUTHORIZATIONS OF KDD AMERICA, INC.

FCC File No.	Description
ITC-98-503 ITC-214-19980607-00388	Authority to resell private lines for provision of switched service to Japan
ITC-98-326 ITC-214-19980424-00275	Authority to resell non-interconnected private lines to all permissible international points, except Japan, U.K. Belgium, Germany, France, and Hong Kong
ITC-98-124 ITC-24-19980205-00076	Authority to resell basic switched, private line, data, television, and business services to Japan
ITC-97-096 ITC-214-19970212-00085	Authority to resell switched services to Belgium, France, Hong Kong, Mongolia, and Russia
ITC-97-098 ITC-214-19970212-00082	Authority to resell basic switched, private line, data, television, and business services to all international points except Japan, Belgium, France, Hong Kong, Mongolia, and Russia
ITC-97-047 ITC-214-19970113-00019	Authority to resell non-interconnected private lines to Belgium, France, and Hong Kong
I-T-C-95-481	Authority to resell non-interconnected private lines to Japan, Germany, and U.K.
ITC-98-125 ITC-214-19980205-00077	Authority to operate as a facilities-based carrier between the United States and Japan
ITC-97-635 ITC-214-19971014-00620	Authority to operate as a facilities-based carrier to all permissible international points except Japan

CERTIFICATE OF SERVICE

I, Theresa L. Pringleton, do hereby certify that the foregoing **Application** was hand delivered, this 27th day of July 2000, to the following:

Donald Abelson
Bureau Chief
International Bureau
Federal Communications Commission
The Portals
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Washington, D.C. 20554

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Division Chief
Telecommunications Division
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Peggy Reitzel
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Theresa L. Pringleton

Theresa L. Pringleton