

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

In the Matter of)
)
AT&T CORP.)
BELLSOUTH INTERNATIONAL, INC.)
CABLE & WIRELESS USA, INC.)
CABLE & WIRELESS GLOBAL NETWORKS)
LTD.)
GTE INTELLIGENT NETWORK SERVICES,)
INC.)
IXC COMMUNICATIONS SERVICES, INC.)
KDD AMERICA, INC.)
MCI WORLDCOM, INC.)
PACIFIC GATEWAY EXCHANGE (BERMUDA))
LIMITED)
RSL COM U.S.A., INC.)
SPRINT COMMUNICATIONS COMPANY, L.P.)
STAR TELECOMMUNICATIONS, INC.)
STARTEC GLOBAL COMMUNICATIONS)
CORP.)
SWISSCOM NORTH AMERICA, INC.) File No. SCL-99-
TELEBERMUDA INTERNATIONAL LIMITED)
TELEGLOBE USA INC.)
TELENOR GLOBAL SERVICES AS)
TELIA NORTH AMERICA INC.)
VIATEL, INC.)
)
Joint Application for a Submarine)
Cable Landing License Pursuant to)
the Submarine Cable Landing)
License Act and Executive Order)
No. 10530 to Land and Operate)
a Submarine Cable Network Between)
the United States, Denmark,)
Germany, the Netherlands, France,)
and the United Kingdom)

JOINT APPLICATION

AT&T CORP. ("AT&T"), BELLSOUTH INTERNATIONAL, INC.,
("BSI"), CABLE AND WIRELESS USA, INC. ("C&W USA"), CABLE &
WIRELESS GLOBAL NETWORKS LTD. ("C&WGN"), GTE INTELLIGENT

NETWORK SERVICES, INC. ("GTEINS"), IXC COMMUNICATIONS SERVICES, INC. ("IXC-CSI"), KDD AMERICA, INC. ("KDDA"), MCI WORLDCOM, INC. ("MCI WorldCom"), PACIFIC GATEWAY EXCHANGE (BERMUDA) LIMITED ("PGE Bermuda"), RSL COM U.S.A., Inc. ("RSL USA"), SPRINT COMMUNICATIONS COMPANY, L.P. ("Sprint"), STAR TELECOMMUNICATIONS, INC. ("STAR"), STARTEC GLOBAL COMMUNICATIONS CORP. ("STGC"), SWISSCOM NORTH AMERICA, INC. ("SCNA"), TELEBERMUDA INTERNATIONAL LIMITED ("TeleBermuda"), TELEGLOBE USA INC. ("TUSA"), TELENOR GLOBAL SERVICES AS ("Telenor Global"), TELIA NORTH AMERICA INC. ("Telia NA"), and VIATEL, INC. ("Viatel") (hereinafter collectively called the "Joint Applicants") having ownership interests in the TAT-14 CABLE NETWORK ("TAT-14"), hereby apply for a license to land a submarine cable at Manasquan, New Jersey and Tuckerton, New Jersey and to operate the same. This Application is filed pursuant to the provisions of an act entitled "An Act relating to the landing and operation of submarine cables in the United States" (47 U.S.C. Sections 34-39). The capacity of TAT-14 will be sold or leased to users on a non-tariffed, non-common carrier basis.

The Joint Applicants are eighteen of the fifty-one initial investors in TAT-14. The owners of TAT-14 and their

ownership interests are identified in Schedule A annexed hereto.¹

TAT-14 will interconnect landing points at Manasquan, New Jersey; Tuckerton, New Jersey; Blaabjerg, Denmark; Norden, Germany; Katwijk, the Netherlands; St. Valery, France; and Widemouth, North Cornwall, U.K. It will employ state-of-the-art wave division multiplexing ("WDM") fiber optic technology operating at up to 640 Gbps² in a self-healing ring configuration. The Joint Applicants seek to place TAT-14 in commercial service no later than December 31, 2000.

In accordance with Section 1.767 of the Commission's Rules and Executive Order No. 10530, dated May 10, 1954, the Joint Applicants submit the following information in support of this Joint Application:

1. The names and addresses and telephone numbers of the Joint Applicants are:

AT&T Corp.
David Matsushima, Esq.
Senior Attorney
Room B2002
131 Morristown Road
Basking Ridge, NJ 07920-1002
(908) 204-8378

¹ Any slight variation between the names of corporate entities that signed the C&MA and the applicants is due to intra-corporate transfers or reorganizations permitted under the TAT-14 Construction and Maintenance Agreement (attached).

² Gigabits per second.

BellSouth International, Inc.
Charles M. Nalbone, Esq.
Acting General Counsel
Suite 400
1155 Peachtree Street, N.E.
Atlanta, Georgia 30309-4599
(404) 249-4954

Cable and Wireless USA, Inc.
Paul W. Kenefick, Esq.
Regulatory Counsel
8219 Leesburg Pike
Vienna, VA 22182
(703) 790-5300

Cable and Wireless Global Networks LTD
Paul W. Kenefick, Esq.
Regulatory Counsel
8219 Leesburg Pike
Vienna, VA 22182
(703) 790-5300

GTE Intelligent Network Services, Inc.
Gail L. Polivy, Esq.
1850 M Street, N.W., 12th Floor
Washington, D.C. 20036
(202) 463-5200

IXC Communications Services, Inc.
Ms. Jacqueline Caldwell
1122 Capitol of Texas Highway South
Austin, Texas 78746
(512) 231-5182

KDD America, Inc.
Robert Aamoth, Esq.
Kelley Drye and Warren
1200 19th Street, N.W., Suite 500
Washington, D.C. 20036
(202) 955-9600

MCI WorldCom, Inc.
Kerry E. Murray, Esq.
1717 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
(202) 721-2730

Pacific Gateway Exchange (Bermuda) Limited
Mr. Brian Crawford
500 Airport Boulevard, Suite 340
Burlingame, CA 94010
(650) 558-3232

RSL COM U.S.A., Inc.
Mr. Gino Civale
430 Park Avenue, 5th Floor
New York, NY 10022
(212) 588-3600

Sprint Communications Company, L.P.
Leon M. Kestenbaum, Esq.
Vice President
1850 M St., N.W., 11th Floor
Washington, D.C. 20036
(202) 857-1030

Star Telecommunications, Inc.
Mr. Roger S. Morton
8045 Leesburg Pike
Vienna, VA 22182
(703) 506-8464

Startec Global Communications Corp.
Yolanda Faerber, Esq.
General Counsel
10411 Motor City Drive
Bethesda, MD 20817
(301) 767-3749

Swisscom North America, Inc.
Ms. Bryonie Byers
Director, Corporate Development and Legal
2001 L Street N.W. Suite 600
Washington, DC 20036
(202) 785-1145

TeleBermuda International Limited
Lin Gentemann, Esq.
General Counsel
2 Carter's Bay Road, Southside
St. David's DD 02
Bermuda
(441) 296-9000

Teleglobe USA Inc.
Phil Walker, Esq.
Vice President
1751 Pinnacle Drive
McLean, VA 22102
(703) 714-6604

Telenor Global Services AS
Michelle Cohen, Esq.
Paul, Hastings, Janofsky and Walker
1299 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(202) 508-9530

Telia North America, Inc.
Mr. Magnus Kjell
8133 Leesburg Pike, Suite 400
Vienna, VA 22182
(703) 288-1330

Viatel, Inc.
Sheldon M. Goldman, Esq.
Senior Vice President and General Counsel
685 Third Avenue
New York, NY 10017
(212) 350-9200

2. Each of the Joint Applicants, except Sprint, is a corporation. Sprint is a limited partnership organized and existing under the laws of the State of Delaware. AT&T is organized and existing under the laws of the State of New York. BSI is organized and existing under the laws of the State of Georgia. C&W USA is organized and existing under the laws of the District of Columbia. C&WGN is organized and existing under the laws of Ireland. GTEINS is organized and existing under the laws of the State of Delaware. IXC-CSI is organized and existing under the laws of the State of Delaware. KDDA is organized and existing under the laws of

the State of New York. MCI WorldCom is organized and existing under the laws of the State of Delaware. PGE Bermuda is organized and existing under the laws of Bermuda. RSL USA is organized and existing under the laws of the State of Delaware. STAR is organized and existing under the laws of the State of Delaware. STGC is organized and existing under the laws of the State of Maryland. SCNA is organized and existing under the laws of the State of Delaware. TeleBermuda is organized and existing under the laws of Bermuda. TUSA is organized and existing under the laws of the State of Delaware. Telenor Global is organized and existing under the laws of Norway. Telia NA is organized and existing under the laws of the State of Delaware. Viatel is organized and existing under the laws of the State of Delaware. Each of the Joint Applicants is a common carrier subject to the Communications Act of 1934, as amended.

3. Attached hereto as the first attachment is a general route sketch showing the segments and landing points of TAT-14. Three of those subsegments (Segments S1, S2 and S7) and two of the landing points (Segments T1 and T2) are subject to the jurisdiction of the Commission. As illustrated in the first Attachment, TAT-14 consists of seven cable landing stations (Segments T1-T7) and seven "wet" subsegments (Subsegments S1-S7). Subsegment S1 consists of four fiber

pairs between Manasquan and Tuckerton. Segment S2 consists of four fiber pairs between Tuckerton and Widemouth, North Cornwall, U.K. Segment S3 consists of four fiber pairs between Widemouth, U.K. and St. Valery-en-Caux, France. Subsegment S4 consists of four fiber pairs between St. Valey-en-Caux, France, and Katwijk, the Netherlands. Subsegment S5 consists of four fiber pairs between Katwijk, the Netherlands and Norden, Germany. Subsegment S6 consists of four fiber pairs between Norden, Germany and Blaabjerg, Denmark. Subsegment S7 consists of four fiber pairs between Blaabjerg, Denmark and Manasquan, New Jersey.

Each fiber pair will operate at 160 Gbps. The initial capacity of each fiber pair is equivalent to 1024-155 Mbps³ Basic System Modules ("BSMs"), with each BSM containing 63 minimum investment units ("MIUs").⁴

4. TAT-14 will extend from landing points at Manasquan, New Jersey; Tuckerton, New Jersey; Blaabjerg, Denmark; Norden, Germany; Katwijk, the Netherlands; St. Valery-en-Caux, France; and Widemouth, North Cornwall, U.K. (which is two miles from Bude, North Cornwall, U.K.). Maps illustrating these landing points are included in an

³ Megabits per second.

⁴ An MIU is defined in the associated Construction and Maintenance Agreement as One Ring-MIU, which is a nominal 2 Mbps bearer circuit and all the additional overhead bits per second recommended by ITU-T standards for multiplexing, in a ring configuration with the capability of bi-directional operation.

Attachment hereto (the second attachment). TAT-14 will be connected to suitable facilities providing access to the domestic networks in each country or territory. In addition, TAT-14 will be extended by suitable facilities to the terminals of other communications systems, including other cable terminals and satellite earth stations. This will enable TAT-14 to be used for services between and among the United States, Denmark, Germany, the Netherlands, France, and the U.K., and points beyond.

5. TAT-14 will be operated on a non-common carrier basis. Accordingly, the Joint Applicants provide the following information in accordance with Sections 1.767(a)(6) and 63.18(e)(6) of the Commission's Rules. The owners of TAT-14 ("Parties") and their respective ownership interests are listed in Schedule A.

Management of TAT-14 will be in accordance with the terms of the Construction and Maintenance Agreement ("C&MA") governing the cable system. Section 6 of the TAT-14 C&MA specifies that the TAT-14 General Committee, which consists of one representative from each of the parties listed in Schedule A, shall be responsible for:

- (1) the overall supervision of the project;
- (2) approval of the initial budget for TAT-14;
- (3) approval of the TAT-14 annual report submitted by the TAT-14 Managing Group;

- (4) approval of the administrative budget of the Managing Group;
- (5) reviewing and acting on any other reports submitted by the Managing Group; and
- (6) providing a forum for approval and execution of any amendments to the C&MA.

Paragraph 6.3 also provides for the establishment of a Managing Group to assist the General Committee in carrying out its duties.

Pursuant to paragraph 2.2 of the C&MA, the Managing Group consists of one representative from each of the "MOU Parties"⁵ and one representative from any other Party or Parties who, individually or collectively, represent 10 percent or more of the total voting interests in the submarine portion of TAT-14. The MOU Parties are AT&T; British Telecom plc; Cable and Wireless plc; Deutsche Telekom A.G.; France Telecom; KPN Telecom B.V.; MCI International, Inc.; Pacific Gateway Exchange, Inc.; Sprint Communications Company, L.P. ; Swisscom Ltd.; and Telia AB. The C&MA also establishes several subsidiary groups such as the Procurement Group to assist the Managing Group.

⁵ The MOU Parties originally conceived of and promoted the TAT-14 Cable System.

6. In accordance with Section 63.18(h)(1)-(2) of the Commission's Rules, each of the Joint Applicants has in the third Attachment certified its compliance with those rules and specified the names, addresses, citizenship and principal businesses of each applicant's ten percent or greater direct and indirect shareholders or other equity holders, and identified any interlocking directorates.

7. In support of such private carrier status, the Joint Applicants state as follows.⁶ The first landing licenses for private submarine cables were issued in the mid-1980's for PTAT, Tel-Optik, Limited's transatlantic cable,⁷ and for NPC, Pacific Telecom Cable, Inc.'s transpacific cable.⁸ Since then, the private submarine cable business has grown to the point where it has eclipsed the traditional "common carrier consortium" cables.

TAT-12/13, the last transatlantic common carrier consortium cable to be built, is in the process of doubling its capacity to meet demand. But the transatlantic route now has the largest number of technologically advanced private submarine cable systems

⁶ These statements are made without prejudice to the right of any party separately to submit relevant information to the Commission on the matters addressed in Section 7 of this application.

⁷ Tel-Optik, Limited, 100 FCC 2d 1033 (1985). PTAT extends between the U.S. and the U.K.

⁸ Pacific Telecom Cable, Inc., 2 FCC Rcd 2686 (1987). NPC extends between points in Alaska, Oregon and Japan.

in service of any route. The Gemini cable (formerly known as MFS-1) and Atlantic Crossing 1 (AC-1), the last U.S.-Europe transatlantic cables to begin commercial service, are private cables. Gemini is ultimately owned and operated by MCI WorldCom, Inc., and Cable and Wireless plc, two common carriers.

AC-1 is a private cable system, owned by Global Crossing L.L.C., a public company which was capitalized by a group of international investors led by California-based Pacific Capital Group, Inc. AC-1 was constructed and is managed by Tyco International Limited, a company listed on the New York Stock Exchange ("TYC") which purchased the former AT&T Submarine Systems, Inc. Tyco is also an investor in AC-1. Press reports have announced that KPN, Telia, SWISSCOM and Deutsche Telekom have invested \$100 million in the AC-1 project.⁹

Project Oxygen (USA) LLC, an affiliate of CTR Group, Ltd., a New Jersey-based U.S. company, has applied for a landing license to build and operate an ambitious submarine and overland cable project named "Project

⁹ See e.g., Communications Daily, December 22, 1997 at 5. Private cable developers have also been very active in the Pacific. The International Bureau recently granted a landing license to PC Landing Corp. to land and operate a private transpacific submarine cable, Pacific Crossing 1 ("PC-1"), with two landing points in each of the U.S. and Japan. See PC Landing Corp., DA 98-2351, released November 23, 1998.

OXYGEN."¹⁰ This is a global project that will link 78 countries and locations on all continents except Antarctica with up to 168,000 km of fiber optic cable (including 14,000 km of terrestrial segments. Project OXYGEN plans 99 cable system landing points around the world, with ten of those in the U.S.

Project OXYGEN will have a basic transmission capacity ranging from 640 Gbps to 1.920 Tbps¹¹ which it says will be four times the capacity of the highest capacity systems currently under development. Project OXYGEN will be a private cable system, and plans to begin commercial service on some legs by the end of 2000, with additional legs coming on line later. Included in the first phase of the project are transatlantic submarine cables linking points in the U.S., Europe, and South America. Project OXYGEN will provide significant direct competition not only to TAT-14, but to other cables as well.¹²

Because of their status as private cables, the Joint Applicants' competitors will have full freedom to price capacity on their respective cables in any way they

¹⁰ Public Notice, Report No. TEL-00022NS, October 23, 1998.

¹¹ Terabits per second.

¹² CTR Group has its own internet website, www.oxygen.org.

see fit. For example, the application of Project OXYGEN (USA) LLC states that

The OXYGEN cable system will be operated on a private, non-common carrier basis, consistent with the Commission's private submarine cable policy. O2 (USA) is not a common carrier and does not intend to operate as a common carrier in the future. O2(USA) does not and will not offer service indiscriminately to the public, provide any service that is effectively available to the public, or carry for all people indifferently. Rather, O2(USA) will make individualized decisions in each particular case whether and on what terms to deal with prospective customers.

Project OXYGEN Application, File No. SCL-LLIC-19981014-00020 at 16.

In para. 7 of its Order in *PC Landing Corp.*, *supra*, the International Bureau said

...there will be no legal compulsion to serve the public indifferently where there is no public interest reason to require facilities to be offered on a common carrier basis. This public interest analysis has generally focused on the availability of alternate facilities. Where there are sufficient alternatives, the licensee will lack market power and will not be able to charge monopoly rates for cable capacity. The Commission has found that, in those circumstances, the public interest would be served by allowing a submarine cable to be offered on a non-common carrier basis. (fns. omitted)

TAT-14 clearly meets these criteria because of existing and impending competitive forces in the Atlantic. In the transatlantic market, there is existing capacity on many of the older consortium cables as well as on newer private cables such as AC-1. More capacity is coming with Project OXYGEN and the doubling of capacity on TAT-12/13 through wave division multiplexing.

TAT-14 itself will materially increase transatlantic capacity, and individual TAT-14 owners will be sellers of that capacity. PGE, for example, has purchased as much capacity in TAT-14 as Sprint and almost as much as AT&T.¹³ Research analysts at Salomon Smith Barney state that "PGE will sell capacity to the thousands of bandwidth-starved emerging telecom carriers and ISPs while taking advantage of the low-cost structure of the club cables."¹⁴ On that basis, the firm recommends purchase of PGE's stock.

Because TAT-14's owners must bear the entire cost of constructing and maintaining the cable whether or not others buy some of its capacity, it is in their interest to maximize the use of the cable's capacity both by themselves and others. Thus, this cable system will materially facilitate transatlantic traffic.

From a small and tentative start, the Commission's experience with authorizing private submarine cables has been so successful that in the Atlantic, at least, it is unclear whether any new cables will be built as traditional common carrier consortium systems. The submarine cable business is also developing into one where carriers, who originally built cables for their own use, are being

¹³ As can be seen from the attached Schedule A, both Sprint and PGE have a 4.63% ownership interest in TAT-14. AT&T has a 5.68% ownership interest.

¹⁴ Salomon Smith Barney, Pacific Gateway Exchange, Inc., Equity Research Report, November 16, 1998 at 5.

supplanted by entrepreneurs building private systems whose capacity is sold to multiple carriers and others.

These entrepreneurs have total freedom and flexibility to price their product in response to market demands. In order to compete with these private systems, the Joint Applicants must be free to price capacity on a competitive basis and to respond to marketplace demand. Mandating that they offer capacity "indifferently" will, as the Commission has recognized in other contexts, impair their ability to attract customers and to realize a reasonable return on their investment.

The Joint Applicants and the Commission both anticipate that the international telecommunications market will become even more competitive because of the World Trade Organization Agreement on Basic Telecom Services.¹⁵ If the new private cable entrepreneurs have full freedom to respond to market demands and the Joint Applicants do not, TAT-14 will be unable to compete effectively and the Joint Applicants' substantial planned investment will be at risk.

8. The grant of the cable landing license requested will not have a significant impact upon the environment for which Environmental Impact Statements must be prepared under Section 1.1305 of the Commission's Rules.

¹⁵ See, e.g., Rules and Policies on Foreign Participation in the U.S. Telecommunications Market, IB Docket Nos. 97-142 and 95-22, Report and Order on Reconsideration, 12 FCC Rcd 23891 (1997), effective date established 13 FCC Rcd 6219 (1998).

Such licenses are categorically excluded from environmental processing under Section 1.1306 of those Rules.

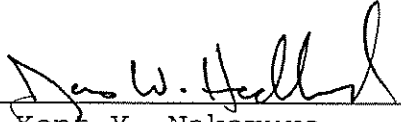
Accordingly, no environmental information need be submitted with this Application under Section 1.1311 of the Commission's Rules.

WHEREFORE, the Joint Applicants request that a license, pursuant to 47 U.S.C. Sections 34 - 39, be granted.

Respectfully submitted,

AT&T CORP.
BELLSOUTH INTERNATIONAL, INC.
CABLE & WIRELESS USA, INC.
CABLE & WIRELESS GLOBAL
NETWORKS LTD
GTE INTELLIGENT NETWORK
SERVICES, INC.
IXC COMMUNICATIONS SERVICES,
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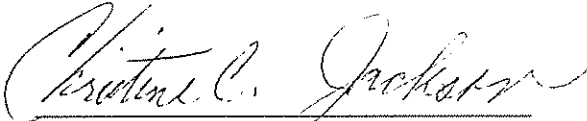
TELEBERMUDA INTERNATIONAL
LIMITED
TELEGLOBE USA INC.
TELENOR GLOBAL SERVICES AS
TELIA NORTH AMERICA
VIATEL, INC.

By 
Kent Y. Nakamura
James W. Hedlund
Attorneys for the
Joint Applicants

Dated: March 3, 1999

CERTIFICATE OF SERVICE

I, Christine C. Jackson, do hereby certify that a copy of the Joint Applicants' Application for a Submarine Cable Landing License Pursuant to the Submarine Cable Landing License Act and Executive Order No. 10530 to Land and Operate a Submarine Cable Network Between the United States, Denmark, Germany, the Netherlands, France, and the United Kingdom has been sent either by United States mail, first class, postage prepaid, or by hand delivery, as indicated, to the parties on the attached list.


Christine C. Jackson

Dated this 3rd day of March, 1999

Regina Keeney, Esq.*
Chief, International Bureau
Federal Communications
Commission
2000 M St., N.W., 8th FL
Washington, D.C. 20554

Mr. George Li*
Deputy Chief, Operations
Telecommunications Division
International Bureau
Federal Communications
Commission
2000 M St., N.W., 8th FL
Washington, D.C. 20554

Rebecca Arbogast, Esq.*
Chief, Telecommunications Div.
International Bureau
Federal Communications
Commission
2000 M St., N.W., 8th FL
Washington, D.C. 20554

Troy Tanner, Esq.*
Chief, Policy & Facilities Branch
Telecommunications Division
International Bureau
Federal Communications
Commission
2000 M St., N.W., 8th FL
Washington, D.C. 20554

Joanna Lowry, Esq.*
Assistant Chief
Policy & Facilities Branch
Telecommunications Division
International Bureau
Federal Communications
Commission
2000 M St., N.W., 8th FL
Washington, D.C. 20554

Mindy Ginsburg, Esq.*
Deputy Chief
International Bureau
Federal Communications
Commission
2000 M St., N.W., 8th FL
Washington, D.C. 20554

Adam Krinsky, Esq.*
Acting Legal Advisor
International Bureau
Federal Communications
Commission
2000 M St., N.W., 8th FL
Washington, D.C. 20554

Mr. Tom Wasilewski*
Chief, Multilateral & Develop-
ment Branch
Telecommunications Division
International Bureau
Federal Communications
Commission
2000 M St., N.W., 8th FL
Washington, D.C. 20554

Mr. Richard Beard
Bureau of International
Communications &
Information Policy
Department of State
2201 C St., N.W., RM 4826
Washington, D.C. 20520-1428

Office of General Counsel
National Security Agency
9800 Savage Road
Fort Meade, MD 20755-6000

Doug Klein, Esq.*
Policy & Facilities Branch
Telecommunications Division
International Bureau
Federal Communications
Commission
2000 M St., N.W., 8th FL
Washington, D.C. 20554

Dr. Ken Stanley*
Telecommunications Division
International Bureau
Federal Communications
Commission
2000 M St., N.W., 8th FL
Washington, D.C. 20554

Steven Lett, Esq.
Bureau of International
Communications &
Information Policy
Department of State
2201 C St., N.W., RM 4826
Washington, D.C. 20520-1428

Mr. Anthony Cina
Bureau of International
Communications &
Information Policy
Department of State
2201 C St., N.W., RM 4826
Washington, D.C. 20520-1428

Ambassador Vonya T. McCann
United States Coordinator
Bureau of International
Communications &
Information Policy
Department of State
2201 C St., N.W., RM 4826
Washington, D.C. 20520-1428

Suzanne Settle, Esq.
Senior Policy Advisor
Department of Commerce
NTIA, Room 4701
14th & Constitution Ave., N.W.
Washington, D.C. 20230

Honorable Larry Irving
Assistant Secretary for
Communications and Information
Department of Commerce
NTIA, Room 4701
14th & Constitution Ave., N.W.
Washington, D.C. 20230

Joan Donoghue, Esq.
Assistant Legal Advisor for
Economic, business and
Communications Affairs
Department of State
2201 C St., N.W., RM 4826
Washington, D.C. 20520-1428

Kathy D. Smith, Esq.
Chief Counsel
Department of Commerce
NTIA, Room 4701
14th & Constitution Ave., N.W.
Washington, D.C. 20230

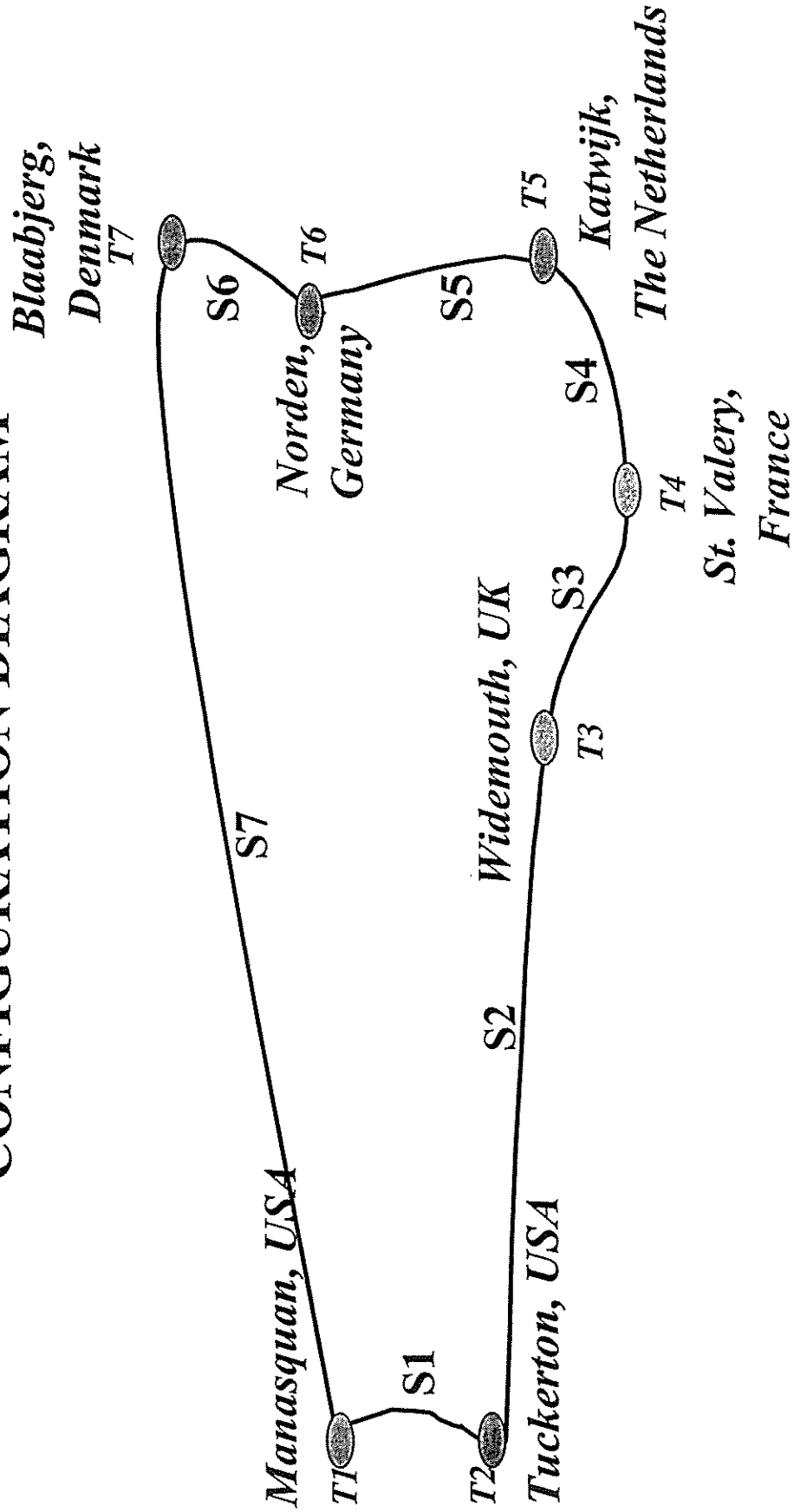
Cathleen Wasilewski, Esq.
Attorney Advisor
Office of the Chief Counsel
Department of Commerce
NTIA, Room 4701
14th & Constitution Ave., N.W.
Washington, D.C. 20230

Honorable John Dalton
Secretary of the Navy
Office of the Secretary
Department of the Navy
The Pentagon
Washington, D.C. 20310

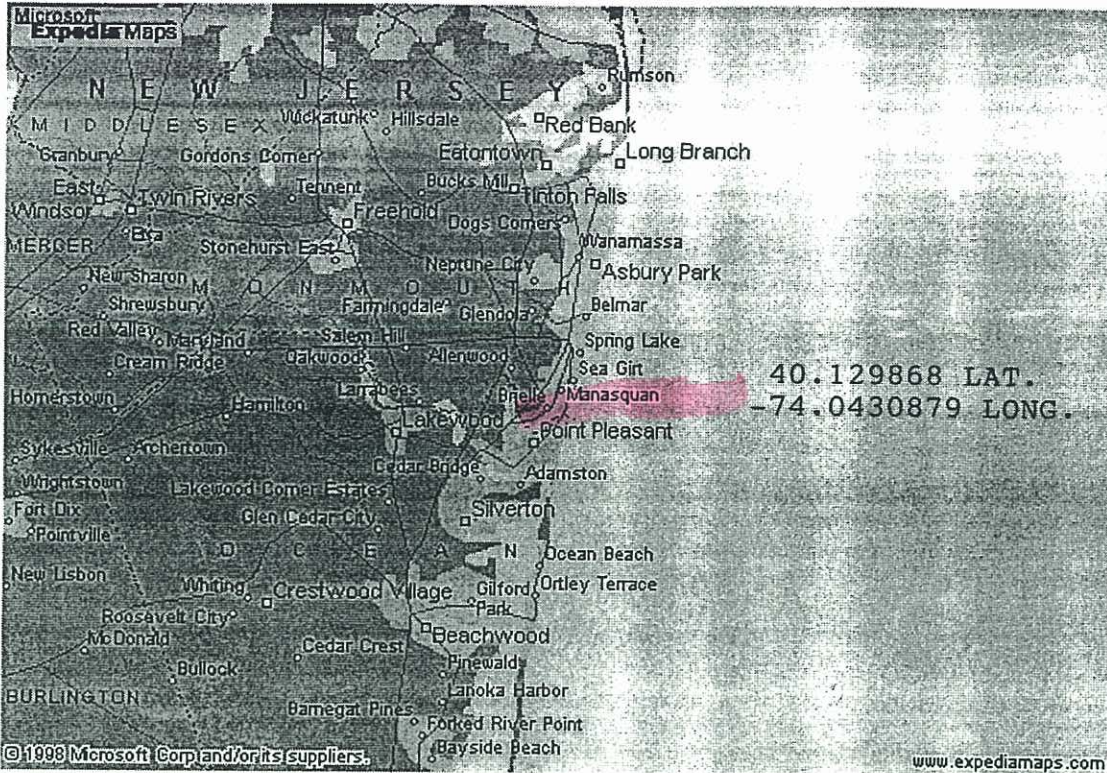
Carl Wayne Smith, Esq.
Code AR Defense Information
Systems Agency
701 South Courthouse Road
Arlington, VA 22204

*** DELIVERED BY HAND**

TAT-14 CABLE NETWORK CONFIGURATION DIAGRAM



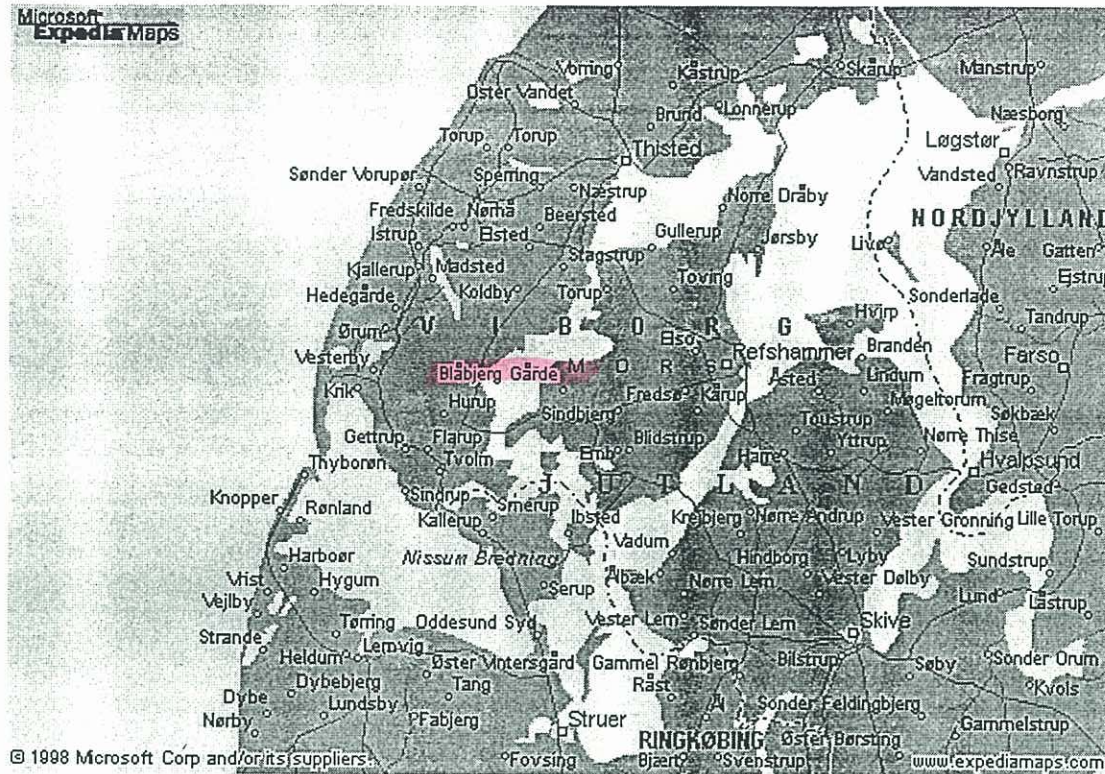
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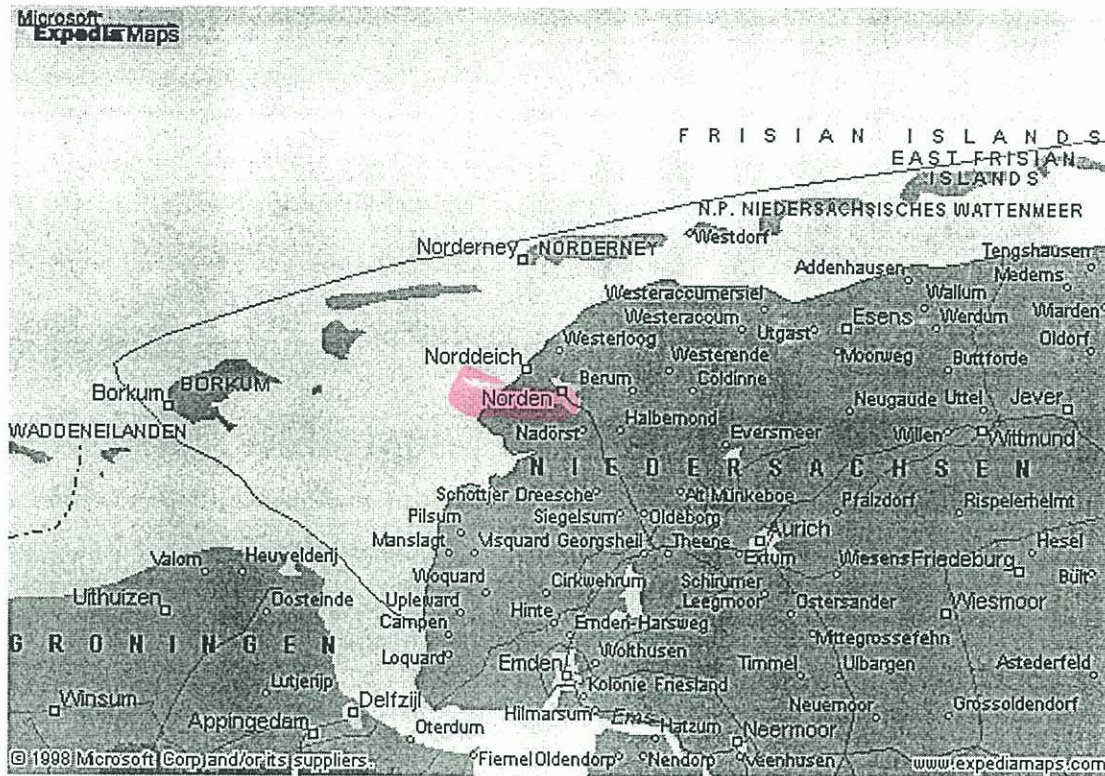
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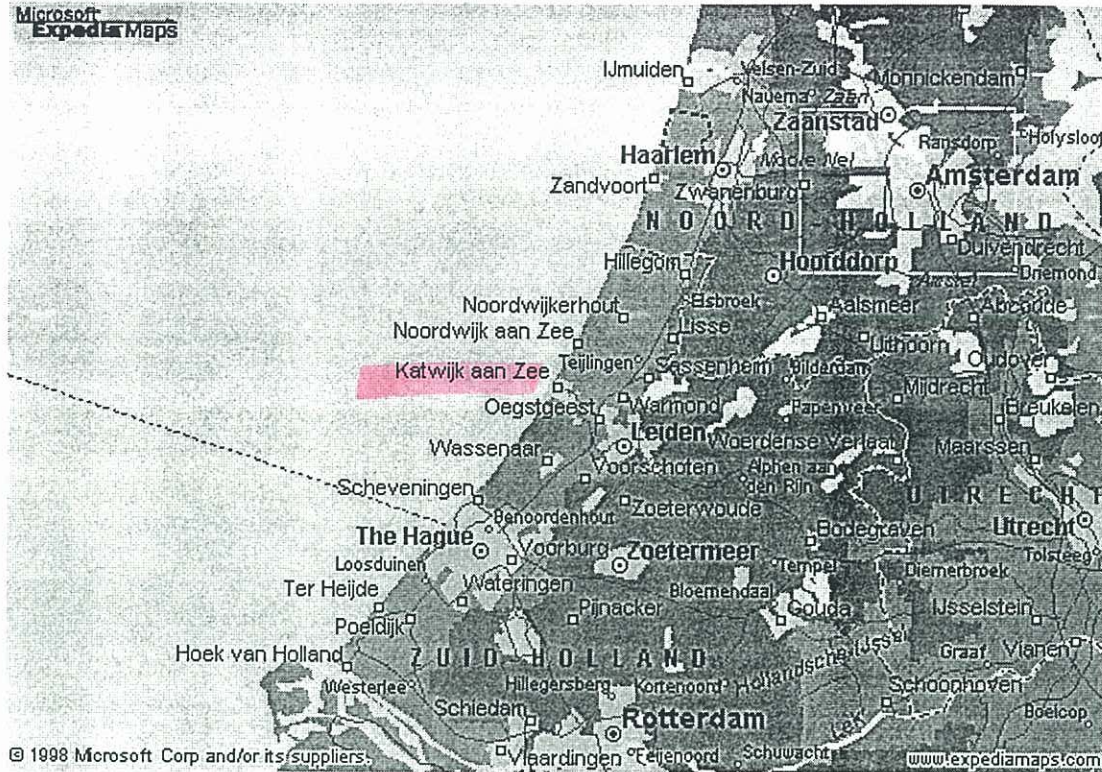
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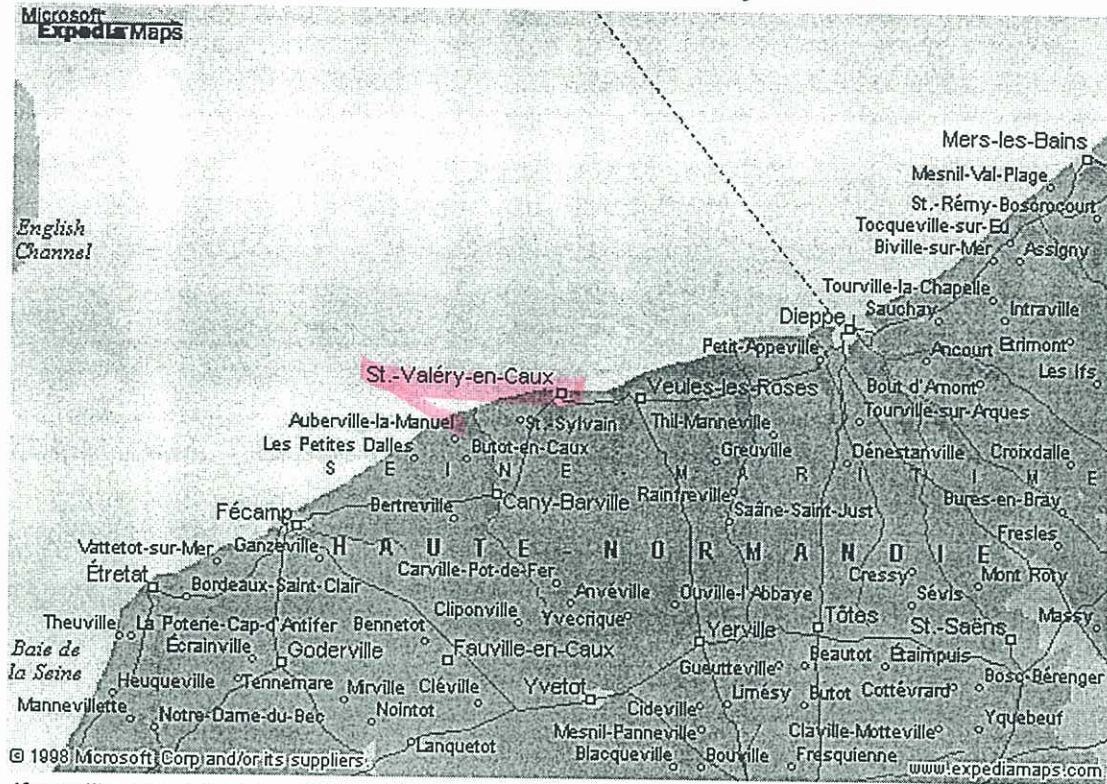
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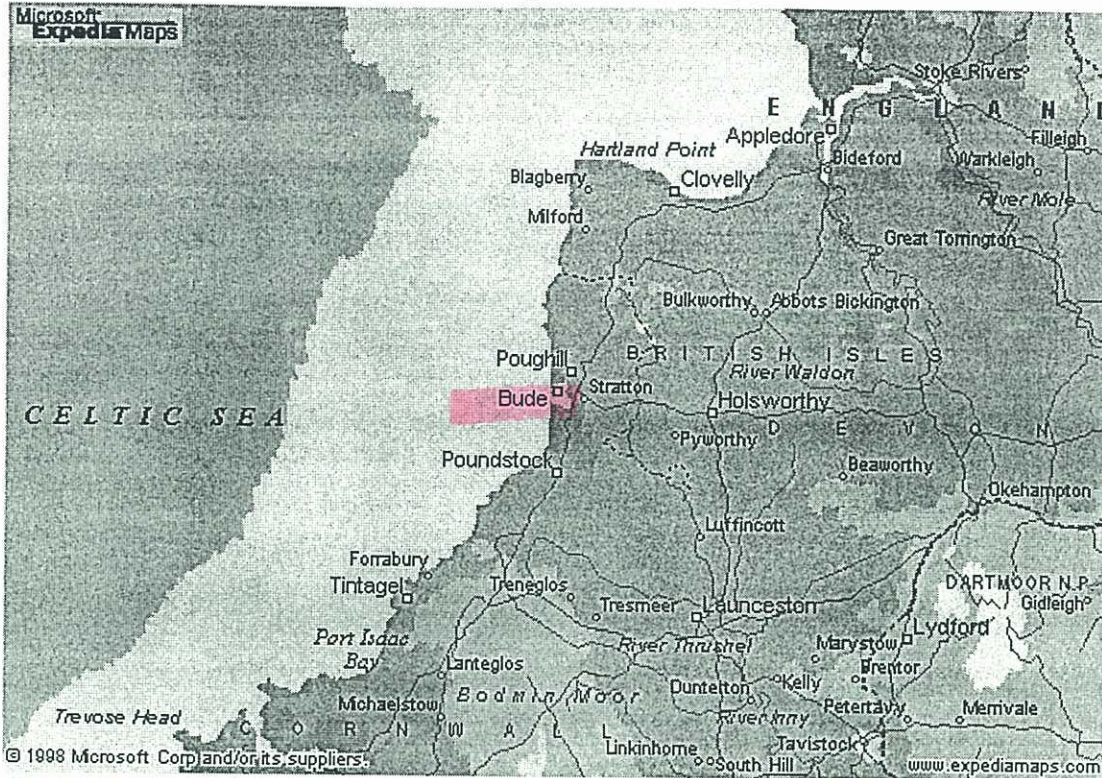
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Microsoft
Expedia Maps

CERTIFICATION UNDER FCC RULES 1.2001-1.2003

AT&T hereby certifies that it is not subject to a denial of Federal benefits that include FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

CERTIFICATION UNDER FCC RULE 63.18(h)

On February 28, 1996, AT&T submitted its Affiliation Statement as required by the Commission's amended rules in IB Docket No. 95-22. AT&T will notify the Commission of any changes to its affiliations as they occur.

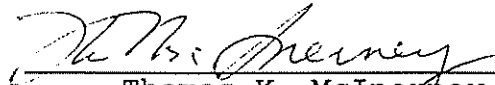
Specifically, AT&T hereby certifies that it has no ten percent or greater direct and indirect shareholders or other equity holders.

The Commission has previously concluded that AT&T's foreign carrier affiliates do not have the ability to discriminate against unaffiliated U.S. carriers because such foreign affiliates do not control bottleneck facilities or services.¹

CERTIFICATION UNDER FCC RULE 63.18(i)

AT&T further certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier or administration with respect to traffic or revenue flows between the U.S. and any foreign country which AT&T may serve under the authority granted pursuant to Part 63 of the Commission's Rules, and AT&T has not agreed to enter into such agreements in the future.

By: AT&T Corp.



Thomas K. McInerney
Managing Director

Date: February 8, 1999

¹ Motion of AT&T to be Declared Non-Dominant for International Services, F.C.C. 96-209, §§89-93 (1996).

CERTIFICATION

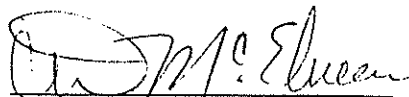
BellSouth International, Inc., ("BSI"), in conjunction with the Joint Application for the TAT-14 Submarine Cable Landing License, hereby certifies that it is affiliated with the following foreign carriers: Abiatar S.A. in Uruguay, BCP S.A. and BSE S.A. in Brazil, BellSouth Chile S.A. and BellSouth Comunicaciones S.A. in Chile, BSC de Panama S.A. in Panama, CellCom Israel Ltd. in Israel, Compañía de Radiocomunicaciones Moviles S.A. in Argentina, Dansk Mobiltelefon I/S (d/b/a SONOFON) in Denmark, Otecel S.A. in Ecuador, Telcel Celular C.A. in Venezuela, Telefonía Celular de Nicaragua, S.A. in Nicaragua, and Tele 2000, S.A. in Peru.

Each of these entities effectively has been found by the Commission to lack market power in their respective markets to affect competition adversely in the U.S. market and to have no ability to discriminate against unaffiliated U.S. carriers. *See, e.g.,* File Nos. ITC-97-645 and ITC-97-644, Overseas Common Carrier Section 214 Applications, Actions Taken, Report No.: I-8277, DA 97-2586, released Dec. 11, 1997; and File No. ITC-214-19980728-00520, Overseas Common Carrier Section 214 Applications, Actions Taken, Report No. TEL-00006, DA No. 98-1811, released Sept. 10, 1998.

BellSouth International, Inc., is a wholly owned subsidiary of BellSouth Enterprises, Inc., a telecommunications holding company organized under the laws of the State of Georgia. BellSouth Enterprises, Inc., is a wholly owned subsidiary of BellSouth Corporation, which is a publicly held telecommunications holding company organized under the laws of the State of Georgia. Neither holding company is a foreign carrier as such term is defined in section 63.18(h)(1)(ii) of the Commission's rules.

BellSouth International, Inc., has no interlocking directorates with other carriers.

BellSouth International, Inc., certifies that neither it, its sole stockholder BellSouth Enterprises, Inc., nor BellSouth Corporation is subject to denial of federal benefits, including FCC benefits, under Sections 1.2001-1.2003 of the Commission's Rules and the Anti-Drug Abuse Act of 1988.



Clifton D. McElveen
President-Network Services
BellSouth International, Inc.
1100 Peachtree Street, N.E.
Suite 500
Atlanta, GA 30319-4599
(404) 249-4813

February 12, 1999

Dated: February 12, 1999



CABLE & WIRELESS, INC.

Cable & Wireless, Inc
8219 Leesburg Pike
Vienna
Virginia 22182

Telephone: (703) 790-5300

CABLE & WIRELESS USA, INC.

CERTIFICATION

I hereby certify to the following:

- (1) Cable & Wireless USA, Inc. ("C&W USA"), a District of Columbia corporation, is a wholly owned subsidiary of Cable and Wireless Holding, Inc., a Virginia corporation, which is, in turn, a wholly-owned subsidiary of The Eastern Leasing Company, Ltd., a Luxembourg corporation, which is, in turn, a wholly-owned subsidiary of Cable and Wireless plc, a publicly held United Kingdom corporation, with headquarters at 124 Theobalds Road, London, United Kingdom, WC1X 8RX.
- (2) Cable and Wireless plc possesses direct and indirect ownership interests of greater than 25 percent in foreign carriers, as defined in §63.18(h)(1)(ii) of the Commission's rules, in each country listed in the Attachment to this Certification.
- (3) In accordance with the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862 and §§ 1.2001 - 1.2003 of the Commission's rules, Cable & Wireless USA, Inc. hereby certifies that neither C&W USA nor any officer, director, or person holding 5% or more of the outstanding shares of C&W USA is subject to a denial of federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.
- (4) The applicant further certifies that its sole shareholder and ultimate parent is Cable and Wireless, plc, a company organized under the laws of England and Wales. The only 10 percent or greater shareholder in Cable & Wireless plc is Veba Telecommunications GmbH, a telecommunications holding company in

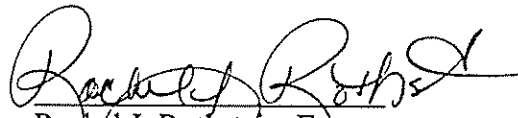
Germany, which owns 10 percent of Cable & Wireless plc. The address of Veba Telecommunications is:

Veba Telecommunications GmbH
Benningsenplatz 1
D-40474 Dusseldorf
GERMANY

No director or officer of C&W USA holds a similar position in any other carrier subject to the Communications Act

- (5) I further certify that I am authorized to enter into this certification on behalf of C&W USA.

By:



Rachel J. Rothstein, Esq.
Vice President, Regulatory and
Government Affairs
Cable and Wireless USA, Inc.

February 11, 1999

ATTACHMENT

**COUNTRIES IN WHICH CABLE & WIRELESS PLC POSSESSES 25% OR
GREATER COMMON DIRECT OR INDIRECT OWNERSHIP IN A FOREIGN
CARRIER**

Anguilla
Antigua
Ascension Island
Australia
Barbados
Bermuda
British Virgin Islands
Cayman Islands
Canada
Diego Garcia
Dominica
Falkland Islands
Fiji
Grenada
Hong Kong
Jamaica
Japan
Macau
Maldives
Montserrat
Panama
Philippines
Russia
Seychelles
Solomon Islands
St. Helena
St. Kitts & Nevis
St. Lucia
St. Vincent
Tonga
Trinidad & Tobago
Turks & Caicos
United Kingdom
Vanuatu
Yemen

CABLE & WIRELESS GLOBAL NETWORKS LTD.

CERTIFICATION

I hereby certify to the following:

1. Cable & Wireless Global Networks Ltd ("C&WGN"), a limited liability company of Ireland is ultimately a wholly owned subsidiary of Cable & Wireless plc, a publicly held United Kingdom corporation, with headquarters at 124 Theobalds Road, London, United Kingdom, WC1X 8RX.
2. Cable & Wireless plc possesses direct and indirect ownership interests of greater than 25 percent in foreign carriers, as defined in §63.18(h)(l)(ii) of the Commission's rules, in each country listed in the Attachment to this Certification.
3. In accordance with the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862 and §1.2001 – 1.2003 of the Commission's rules, C&WGN hereby certifies that neither C&WGN nor any officer, director, or person holding 5% or more of the outstanding shares of C&WGN is subject to a denial of federal benefits pursuant to section 5301 of the Anti-Drug Act of 1988.
4. The applicant further certifies that its ultimate parent is Cable and Wireless plc, a company organised under the laws of England and Wales. The only 10 percent or greater shareholder in Cable & Wireless plc is Veba Telecommunications GmbH, a telecommunications holding company in Germany, which owns 10 percent of Cable & Wireless plc. The address of Veba Telecommunications is:

Veba Telecommunications GmbH
Benningssenplatz 1
D-40474 Dusseldorf
GERMANY

No director or officer of C&WGN holds a similar position in any other carrier subject to the Communications Act.

5. I further certify that I am authorised to enter into this certification on behalf of C&W Global Networks Ltd.

By: Andrew Haire

Andrew Haire

Corporate Secretary

February 19, 1999

CERTIFICATIONS

In accordance with Sections 1.2002 and 63.18(j) of the Commission's Rules, GTE Intelligent Network Services Incorporated ("GTEINS") hereby certifies that it is not subject to a denial of federal benefits, including benefits of the Commission pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988 (28 U.S.C. §862).

Pursuant to Section 63.18(h) of the Commission's Rules, GTEINS certifies that it is a subsidiary of GTE Corporation. Affiliations of GTE companies with foreign carriers are a matter of record and are currently on file with the Commission (FCN-NEW-19981104-0038).

Pursuant to Section 63.18(h)(2) of the Commission's Rules, GTEINS certifies that it is a wholly-owned subsidiary of GTE Internetworking Incorporated, which is wholly-owned by GTE Corporation. GTE Corporation, located at Westpoint Building, 1255 Corporate Drive, Irving, Texas 75038, is a Delaware Corporation with a principal business of telecommunications. GTE Corporation is a publicly-held corporation and no one individual holds a 10% or greater interest in GTE Corporation.

GTE Intelligent Network Services Incorporated



Gail L. Polivy
Attorney for GTE Intelligent Network
Services Incorporated

Dated: February 8, 1999

CERTIFICATION

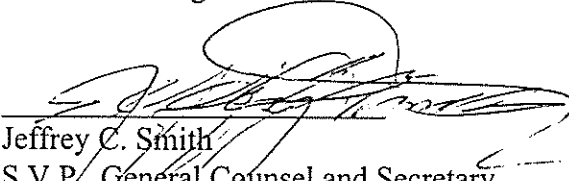
IXC Communications Services, Inc. ("IXC-CSI"), hereby certifies that it is affiliated with a foreign carrier in the United Kingdom, Storm Telecommunications, Limited ("Storm"). IXC-CSI is affiliated with IXC International, Inc. ("IXC International"). Both IXC-CSI and IXC International are wholly owned subsidiaries of IXC Communications, Inc. ("IXC"). IXC International holds a forty percent ownership interest in Storm. Telenor Carrier Services AS also holds a forty percent ownership interest in Storm, and Clarion Resources Communications Corporation Holds a ten percent interest. Storm is a competitive international telecommunications carrier, which is incorporated in the United Kingdom. Storm is not a local exchange carrier. Storm, which has switches in London, England and Frankfurt, Germany commenced operations on June 15, 1998. Storm operates in the following European countries: France, Germany, the Netherlands, and the United Kingdom.

Storm is a new entrant in its respective market, has no market power, and no ability to discriminate against unaffiliated United States carriers.

IXC-CSI is a wholly-owned subsidiary of IXC, which is a publicly held Delaware corporation that supplies telecommunications capacity. IXC's address is 1122 Capital of Texas Highway South, Austin, Texas 78746. One shareholder of IXC currently owns more than 10 percent of IXC's shares: the Trustees of General Electric Pension Trust. No one beneficiary of the pension trust owns 10 percent or more of the pension trust and no one beneficiary of the pension trust owns 10 percent or more of the stock held by the pension trust.

IXC-CSI has interlocking directorates with its wholly-owned subsidiaries, Telecom One, Inc. and Eclipse Telecommunications, Inc. IXC-CSI has no interlocking directorates with the other applicants.

IXC-CSI is not subject to denial of federal benefits, including FCC benefits, under Sections 1.2001-1.2003 of the Commission's Rules and the Anti-Drug Abuse Act of 1988.



Jeffrey C. Smith
S.V.P., General Counsel and Secretary
IXC Communications Services, Inc.
1122 Capital of Texas Highway South
Austin, Texas 78746
(512) 328-1112

Dated: February 18, 1999


CERTIFICATION

I, Hiroshi Hirai, President and Chief Executive Officer of KDD America, Inc., hereby certify that:

1. KDD America, Inc. is affiliated with foreign carriers, as defined in 47 C.F.R. §63.18(h)(1), in the following countries: Japan, the United Kingdom, Singapore, Australia, Germany, France, Hong Kong, Mongolia and Russia.

2. KDD America, Inc. is a wholly-owned subsidiary of Kokusai Denshin Denwa Co., ("KDD Japan"), which is located at 2-3-2 Nishi-shinjuku, Shinjuku, Tokyo, Japan, 163-03. KDD Japan is a Japanese corporation that provides international telecommunications services. KDD America has no interlocking directorates.

3. 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.



Hiroshi Hirai
President and Chief Executive Officer
KDD America, Inc.

Dated: 2/24/1999

CERTIFICATION UNDER FCC RULES 1.2001-1.2003

MCI WorldCom, Inc. hereby certifies that it is not subject to a denial of Federal benefits that include FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

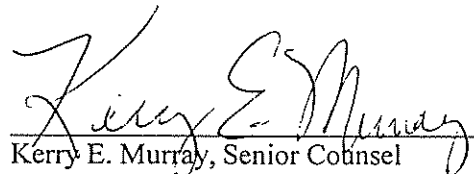
CERTIFICATION UNDER FCC RULE 63.18(h)

MCI WorldCom, Inc. has submitted information regarding its foreign affiliations pursuant to Section 63.11 of the Commissions Rules. This information is publicly available at the Federal Communications Commission.

TEN PERCENT OR GREATER SHAREHOLDERS AND INTERLOCKING DIRECTORATES
PURSUANT TO SECTION 63.18(h) OF THE COMMISSION'S RULES

MCI WorldCom has no ten percent or greater direct or indirect shareholder or other equity holder. There are no interlocking directorates.

By: MCI WorldCom, Inc.

A handwritten signature in black ink, appearing to read "Kerry E. Murray", is written over a horizontal line.

Kerry E. Murray, Senior Counsel
International Regulatory Affairs

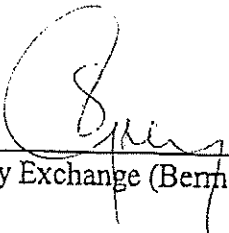
Date: February 10, 1999

CERTIFICATION

Pacific Gateway Exchange (Bermuda) Limited ("PGE Bermuda"), in conjunction with its application for the TAT-14 CABLE NETWORK, hereby certifies that it is affiliated with foreign carriers that are direct or indirect subsidiaries of Pacific Gateway Exchange, Inc. ("PGE"), the 100% parent of PGE Bermuda. PGE has subsidiaries in Australia, Canada, Germany, Japan, New Zealand, Russia, Spain and the United Kingdom. Each such subsidiary is a carrier in its respective country. Each of these foreign carriers: is a new entrant competing against one or more dominant carriers; has significantly less than 50% market share; and lacks the ability to discriminate against unaffiliated U.S. carriers through the control of bottleneck facilities or the exercise of market power.

Mr. Howard A. Neckowitz, Chairman and CEO of PGE, owns or has the power to vote approximately 20% of the common stock of PGE, the parent of PGE Bermuda. Mr. Neckowitz is a U.S. citizen; his principal business is CEO of PGE; and his address is c/o Pacific Gateway Exchange, Inc., 500 Airport Boulevard, Suite 340, Burlingame, California 94010.

PGE Bermuda certifies that PGE Bermuda, PGE, and other affiliates are not subject to a denial of federal benefits, including FCC benefits, under Sections 1.2001-1.2003 of the Commission's Rules and the Anti-Drug Abuse Act of 1988.



Pacific Gateway Exchange (Bermuda) Limited

CERTIFICATION

My name is Eric Fishman and I am Assistant Secretary of RSL COM U.S.A., Inc. ("RSL USA," formerly known as International Telecommunications Corporation). RSL USA is the parent corporation of RSL COM PrimeCall, Inc. ("PrimeCall," formerly known as Intelco, Global Information Services, Ltd.) and LDM Systems, Inc. ("LDM")(collectively, the "RSL Subsidiaries"). RSL USA and the RSL Subsidiaries are each authorized under Section 214 of the Communications Act of 1934, as amended, to provide international telecommunications services. Each company is also authorized to provide intrastate interexchange telecommunications services in over 40 states. RSL USA is a Delaware corporation, with headquarters at 430 Park Avenue, 5th Floor, New York, New York 10022.

RSL USA hereby certifies that it has no affiliation, as defined by Section 63.18 of the Commission's rules, with any foreign carriers, and that it has no interlocking directorates with other Section 214 certificated telecommunications carriers, except as set forth herein. In support of this certification, RSL USA hereby states as follows:

The parent corporation of RSL USA is RSL COM North America, Inc. ("RSL North America," formerly known as International Telecommunications Group, Ltd.), a Delaware corporation headquartered at 767 Fifth Avenue, Suite 4200, New York, New York 10153, holding approximately 97% of its capital stock. RSL Communications PLC, a corporation organized under the laws of the United Kingdom, owns 100% of RSL North America's capital stock. The parent corporation of RSL Communications PLC, holding 100% of its capital stock is, in turn, RSL Communications, Ltd. ("RSL Communications"), a Bermuda corporation. . RSL Communications is a publicly held corporation (NASDAQ) whose controlling shareholders are Ronald S. Lauder, Leonard A. Lauder and Itzhak Fisher.

The principal shareholders of RSL Communications, Ltd. are Ronald S. Lauder, Leonard A. Lauder and Itzhak Fisher, who hold direct and indirect ownership interests in the company of 32.1%, 11.7%, and 7.9%, respectively. Ronald S. Lauder, a co-founder of RSL Communications, serves as its Chairman. A former U.S. Ambassador to Austria, Mr. Ronald Lauder is a principal shareholder of The Estee Lauder Companies Inc., and is founder of Central European Media Enterprises Ltd., an owner and operator of commercial television stations and networks in Central and Eastern Europe. Leonard A. Lauder is Chief Executive Officer and Chairman of the Board of Estee Lauder. Mr. Fisher, also a co-founder of RSL Communications, has been a director, President and Chief Executive Officer of RSL Communications since its inception. Messrs. Lauder and Mr. Fisher are all U.S. citizens.

The names of the officers and directors of RSL Communications, Ltd. are attached hereto.

RSL USA and the RSL Subsidiaries contain the following interlocking directorates: Mark Hirschhorn (RSL USA, PrimeCall and LDM), Ed Thomas (RSL USA and

PrimeCall), Nir Tarlovsky (RSL USA and PrimeCall), and Itzhak Fisher (RSL USA and PrimeCall).

RSL USA and the RSL Subsidiaries have the following affiliations with foreign carriers:

Asia and Pacific Rim. In Asia, RSL Communications, through its subsidiaries, operates in Australia and Japan:

Australia. RSL Australia is enrolled with the Australian Telecommunications Authority under the provisions of an International Service Providers license as a provider of services with double-ended interconnection. Double-ended interconnection allows the company to interconnect with the Australian PSTN, to resell general carrier services, and to transmit international calls over owned international transmission facilities. The company's principal competitors in Australia are the two licensed general carriers, Telstra (the former PTT) and Optus. Each of these competitors provides a bundle of services including mobile, local and domestic and international long distance. In addition, the company faces competition from switch-based and switchless resellers.

Japan. RSL COM Japan has been granted an International Simple Resale License by Japan's Ministry of Posts and Telecommunications to provide international telephony, fax and data services to and from Japan. The Company has also received a Type II value-added network provider license and may apply for a Type I license to provide facilities-based international long distance service.

Canada. RSL COM Canada Holdings, Inc. has recently acquired Westel Telecommunications, Ltd., a Canadian facilities-based telecommunications provider, from the British Columbia Railway Company. Westel is a provider of alternative long distance voice and data telecommunications services in British Columbia; its principal competitor is BC Telecom, the dominant local access and long distance provider in British Columbia.

Europe. RSL COM Europe, Ltd. ("RSL Europe") is a wholly owned subsidiary of RSL Communications. Through its subsidiaries, RSL Europe has the following affiliations:

Austria. RSL Europe owns 90% of RSL COM Austria AG, which holds a telecommunications license from the Austria Telecom Control GmbH. The license permits RSL COM Austria to provide a full range of telecommunications services including local calls as well as long distance and international services over RSL Communications' global network. RSL COM Austria's primary competitor is Post und Telecom Austria, the dominant supplier of telecommunication services in Austria. The company also competes with the local Austrian affiliates of global carriers such as British Telecom and Global One.

Belgium. RSL Europe holds a 90% interest in European Telecom S.A./N.V. and a 100% interest in RSL COM Telco Belgium S.A., which offer international long distance voice services utilizing dial-in access via autodialers and wireless services. In addition to

the dial-in services it currently offers, RSL Belgium has received a license to offer international and domestic fixed wire long distance services. RSL Belgium's primary competitor is Belgacom, the former PTT and dominant supplier of telecommunications services in Belgium. The company also competes with local Belgian affiliates of global carriers such as Global One and Unisource.

Denmark. RSL Europe, through RSL Netherlands (infra) owns a 100% interest in RSL COM Denmark A/S, which offers its customers international and domestic long distance services utilizing prefix dialing. The company's primary competitor is Tele Danmark, the dominant supplier of telecommunications services in Denmark. The company also competes with other carriers, including primarily Telia (the Swedish PTT), Mobilix A/S (the Danish subsidiary of France Telecom) and Global One.

Finland. RSL Europe owns a 100% interest in RSL COM Finland Oy, which is a fully licensed international long distance carrier in Finland offering international and domestic long distance services. The company's primary competitor is Telecom Finland, the dominant supplier of telecommunications services in Finland. The company also competes with emerging licensed public telephone operators (who are constructing their own facilities-based networks), such as Finnet, Telia, Global One and Facilicom.

France. RSL Europe owns 100% of RSL COM France S.A., which was formed in 1996 for the purpose of acquiring Sprint's international voice business in France. The company recently obtained an authorization to operate a public network and to offer telephone services to the public. The company's principal competitor in France is France Telecom, the dominant supplier of telecommunications services in France, and the Modulance Partenaire International, which offers discount long distance services to the largest commercial customers. The company also faces competition from emerging licensed public telephone operators (who are constructing fiber networks in major metropolitan areas) such as AT&T and Worldcom, and from resellers.

Germany. RSL COM Deutschland GmbH ("RSL COM Germany"), a subsidiary of RSL COM Europe, has been granted a Germany-wide, Class 4 license for public switched telephony service by the federal Ministry of Post and Telecommunications (Bundes Amt fur Post und Telekommunikation-BAPT). This is the eleventh telecommunications service license issued by BAPT and permits RSL COM Germany to transmit voice traffic via its international telecommunications network. RSL COM Germany was formed in 1996 for the purpose of acquiring Sprint's international voice business in Germany. International transmission facilities are leased from Deutsche Telekom. The company has interconnect agreements with Teleglobe International Inc. for termination of its international traffic, and with TelDaFax GmbH for termination of domestic traffic. In Germany, the company competes with facilities-based carriers and resellers. Its principal competitor in Germany is Deutsche Telekom, the dominant supplier of telecommunications services in Germany. The company also faces competition from emerging public telephone operators (who are constructing their own facilities-based networks), from resellers, and from call-back providers.

Italy. RSL Europe holds a 99.3% interest in RSL COM Italia S.r.l. ("RSL Italy"), which is authorized to provide domestic and international voice service, including dial-in access via autodialers and dedicated access lines. RSL Italy's principal competitor is Telecom Italia, the dominant supplier of telecommunications services in Italy. The company also competes with the local Italian affiliates of global carriers such as British Telecom and Global One.

Luxembourg. RSL Communications holds a 90% interest in European Telecom SARL, which offers international long distance voice services utilizing dial-in access via autodialers and wireless services. The company's principal competitor is Enterprise des Postes et des Telecommunications, Luxembourg's PTT. The company also competes with Telcom Luxembourg and Tele2 Europe.

The Netherlands. RSL Europe holds a 100% interest in RSL COM Nederland B.V. ("RSL Netherlands"), which offers international long distance services utilizing direct access, prefix dialing and dial-in access, and calling cards. The company's principal competitor in the Netherlands is PTT Telecom Netherlands, the dominant supplier of telecommunications services in the Netherlands. The company also faces competition from emerging licensed public telephone operators (who are constructing their own facilities-based networks) such as WorldCom, and from mega-carriers such as Concert and Global One.

Portugal. RSL COM Europe holds a 39% interest in Maxitel Servicos e Gestao de Telecomunicacoes, SA, which offers international and long distance services to closed user groups of companies utilizing autodialers and direct access. The company's primary competitor is Portugal Telecom, the dominant supplier of telecommunications services in Portugal. The company also competes with the local Portuguese affiliates of global carriers such as Global One, and with resellers.

Spain. RSL Europe holds a 90% interest in RSL Communications Spain, S.A., which recently received a license to provide closed-user group services in Spain. Only Telfonica de Espana and Retevision are licensed to provide international long distance services in Spain. The range of services that can currently be provided by RSL Spain, pending further deregulation, is limited to closed-user group services.

Sweden. RSL Europe holds a 100% interest in RSL COM Sweden AB, which is licensed as an international carrier in Sweden, providing long distance services domestically and internationally. The company's principal competitor is Telia, the dominant supplier of telecommunications services in Sweden. The company also competes with emerging licensed public telephone operators (which are constructing their own fiber networks), such as Tele 2 and Worldcom, and from resellers.

Switzerland. RSL Europe holds a 78.5% interest in RSL COM Schweiz AG, which provides long distance services. The company's principal competitors in Switzerland are Swisscom, DiAx, Global One, WorldCom, and other smaller resellers.

United Kingdom. RSL COM UK, Ltd. holds an International Facilities Based Telecommunications license authorizing it to acquire IRUs and MIUs on international satellite and cable systems, resell international private lines, as well as interconnect with, and lease capacity at, wholesale rates from British Telecom and Mercury. The company also holds an international simple resale license allowing the company to resell international private lines, as well as interconnect with, and lease capacity at wholesale rates from, British Telecom and Mercury. The company's principal competitors in the U.K. are British Telecom, the dominant supplier of telecommunications services in the U.K., and Mercury. The company also faces competition from emerging licensed public telephone operators (who are constructing their own facilities-based networks) such as Energis, and from resellers, including Worldcom and Global One.

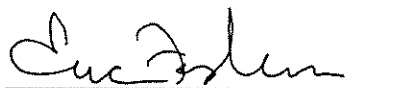
Latin America. RSL Latin America is a joint venture 51% owned by RSL Communications, Ltd. and 49% by the Cisneros Group. The Company recently entered into a joint venture agreement with PCM Comunicaciones, a licensed long distance telecommunications service provider in Mexico, to provide domestic and international long distance telecommunications services primarily to small and medium-sized businesses in Mexico. RSL Venezuela, a wholly owned subsidiary of RSL Latin America, holds Concessions for Value Added and Data Services which allow it to provide international voice services via dedicated access provided on a private network. Its primary competitor is CANTV, the dominant supplier of telecommunications services in Venezuela. RSL Venezuela also competes with local Venezuelan affiliates of global carriers such as British Telecom, Global One and Mercury, regional competitors such as Telefonica de Espana, Impsat and Charter Communications, and callback operators.

No Special Concessions. RSL USA hereby certifies that none of the above-described affiliated foreign carriers has the ability to discriminate against unaffiliated U.S. international carriers through control of bottleneck services or facilities in the named foreign countries. RSL USA further certifies that neither it nor any of its subsidiaries has agreed to accept special concessions directly or indirectly from any foreign carrier or administration with respect to traffic or revenue flows between and United States and any foreign country which the RSL Subsidiaries may serve, and will not enter into such agreements in the future.

RSL USA further certifies that, with the exception of certain switches and submarine fiber facilities, none of the above-described foreign carriers owns or controls telecommunications facilities, as defined in Section 63.18(h)(4) of the Commission's rules (i.e., the underlying telecommunications transport means, including intercity and local access facilities, used by such foreign carriers to provide international telecommunications services offered to the public) in the destination countries set forth above.

Anti-Drug Abuse Act Certification. RSL USA hereby certifies, pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, that it is not subject to a denial of Federal benefits that include FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

I hereby state, under penalty of perjury, that the statements in this Certification are correct and complete, to the best of my knowledge.

A handwritten signature in black ink, appearing to read "Eric Fishman", written over a horizontal line.

Eric Fishman
Assistant Secretary and
Counsel to
RSL COM U.S.A., Inc.

February 12, 1999

CERTIFICATION

Sprint Communications Company, L.P. ("Sprint"), in conjunction with its application for the Japan-U.S. Cable Network submarine cable system, hereby certifies that it is affiliated with Global One, the global partnership formed by Sprint, France Telecom (FT) and Deutsche Telekom (DT). Global One's affiliates have ownership interests in international facilities in the U.K., Sweden, Norway, Finland, Denmark, the Netherlands, Australia, El Salvador, Guatemala, and New Zealand, each of which is or will be a new carrier in their respective countries. Sprint is also affiliated with Call-Net, a Canadian holding company with a subsidiary that does business in Canada as Sprint Canada and which recently acquired the nondominant U.S. carrier FONOROLA; Barak, a new entrant in Israel's communications market; and Tianjin Global Communications Company, which is a new entrant that provides local service in China on a limited basis.

Each of these entities is a new entrant in its respective market, has no market power, and no ability to discriminate against unaffiliated United States carriers.

FT and DT each have a 10 percent equity ownership interest in Sprint. FT is a provider of telecommunications services and is organized under the laws of France. Its headquarters is located at 6 place d'Alleray, 75505 Paris, France. DT is a provider of telecommunications services organized under the laws of the Federal Republic of Germany. Its headquarters is located at Godesberger Allee, D-53175, Bonn, Germany. Mr. Michel Bon, Chairman of France Telecom, and Dr. Ron Sommer, Chairman of the board of management of DT, are directors of Sprint Corporation, Sprint's parent.

Sprint certifies that its general partner and limited partners are not subject to denial of federal benefits, including FCC benefits, under Sections 1.2001-1.2003 of the Commission's Rules and the Anti-Drug Abuse Act of 1988.



Kent Y. Nakamura
Its Attorney
1850 M Street, N.W.
Suite 1100
Washington, D.C. 20036
(202) 857-1030

Dated: February 25, 1999

Section 63.18 Certification of STAR Telecommunications, Inc.

I hereby certify to the following:

(1) Foreign Carrier Affiliates. STAR Telecommunications, Inc. (STAR) has three foreign carrier affiliates: (1) STAR Europe Ltd. (STAR Europe), which holds licenses in the United Kingdom to provide international common carrier services; (2) STAR Telecommunications Deutschland GmbH (STAR Germany), which holds a license in Germany to provide international common carrier services; and (3) PT-1 Communications UK Ltd., which holds a license in the United Kingdom to provide international common carrier services. None of these foreign affiliates have market power in their respective countries, and each is estimated to have less than five percent of the traffic on their respective routes to the United States.

(2) STAR Ownership. The ten percent or greater shareholders of STAR are as follows:

Name: Christopher E. Edgecomb
Address: 223 East De La Guerra Street
Santa Barbara, California 93101
Citizenship: United States
Principal Business: Telecommunications

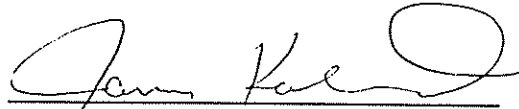
Name: Samer Tawfik
Address: 30-50 Whitestone Expressway
Flushing, New York 11354
Citizenship: United States
Principal Business: Telecommunications

(3) Interlocking Directorates. Mary A. Casey, president, secretary and a director of STAR, is also president and a director of STAR Europe. Kelly D. Enos, chief financial officer and a director of STAR, is also chief financial officer, secretary and a director of STAR Europe and chief financial officer, managing director, secretary and a director of STAR Germany.

(4) Special Concessions. STAR 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 and will not enter into such agreements in the future.

(5) Anti-Drug Abuse Act Certification. In accordance with the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, and Sections 1.2001-1.2003 of the Commission's Rules, 47 C.F.R. § 1.2001-1.2003, neither STAR nor any of its officers, directors, or five percent of greater shareholders is subject to a denial of U.S. federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

(6) I am authorized to make this certification on behalf of STAR.



James Kolsrud
Executive Vice President of Network
Engineering and Operations
STAR Telecommunications, Inc.

February 18, 1999



April 9, 1999

Magalie Salas, Esq.
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, DC 20554

Re: Application of AT&T, et al., SCL-LIC-19990303-0004 ("TAT-14");
Certification of Startec Global Communications Corporation

Dear Ms. Salas:

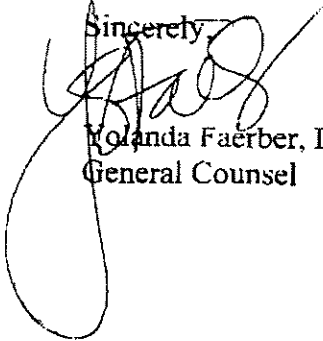
In response to the request of Mr. George Li, Deputy Chief of the International Bureau's Telecommunications Division, Startec Global Communications Corporation ("STGC") hereby provides additional information concerning STGC's ownership structure. This information is intended to supplement SGTC's Certification included in the above-captioned application.

STGC Ownership. The ten percent or greater shareholders of STGC are as follows:

Name:	Mr. Ram Mukunda
Address:	8906 Durham Drive Potomac, MD 20854
Citizenship:	United States
Principal Business:	Telecommunications

Should you have further questions, please do not hesitate to contact the undersigned at (301) 767-4060.

Sincerely,


Rolanda Faerber, Esq.
General Counsel

cc: Mr. George Li

Certification

Startec Global Communications Corporation ("STGC"), in conjunction with its application for the TAT-14 Cable Network submarine cable system, hereby certifies that with the exception of an affiliation with a non-dominant foreign carrier in Germany, it has no affiliation with any foreign carrier as defined under Section 63.18(h)(1) of the Commission's Rules

The German entity is a new entrant in its respective market, has no market power, and no ability to discriminate against unaffiliated United States carriers.

STGC owns all of the issued and outstanding capital stock of PCI Communications, Inc. ("PCI") and Trans-Pacific Tech, Inc. ("TPT"). PCI is a provider of telecommunications services organized under the laws of Guam. TPT was the record owner of minimum investment units in the Sea-Me-We 3 submarine cable project, and is organized and existing under the laws of the State of Delaware. Neither PCI nor TPT are carriers.

STGC certifies pursuant to §§ 1.2001 through 1.2003 of the Commission's Rules that neither it nor PCI and TPT are subject to denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.



Ram Mukunda
President & Chief Executive Officer
Startec Global Communications Corporation



Swisscom North America
2001 L Street, N.W.
Suite 600
Washington, D.C. 20036
Telephone 202-785-1145
Toll-free 800-966-1145
Telefax 202-429-0514

Certification

Swisscom North America, Inc. ("SCNA"), in conjunction with its application for the TAT-14 Cable Network submarine cable system, hereby certifies that with the exception of (i) Swisscom AG, the parent company of Swisscom North America, (ii) affiliations with foreign carriers in Germany, Austria, India and Malaysia (iii) and recently acquired affiliations with carriers in France, Italy, Liechtenstein -- foreign carriers for which notification is being provided concurrently to the Commission by separate letter -- it has no affiliation with any foreign carrier as defined under Section 63.18(h)(1) of the Commission's Rules

Each of the entities in (ii) and (iii) is a new entrant in its respective market, has no market power, and no ability to discriminate against unaffiliated United States carriers.

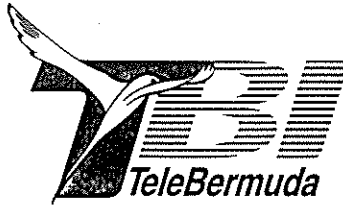
Swisscom AG owns all of the issued and outstanding capital stock of SCNA. Swisscom AG is a partially privatized company as of October 5, 1998, with 34.5% of its share being publicly held. Swisscom AG is a provider of telecommunications services organized under the laws of Switzerland and its headquarter is located in 21 Viktoriastrasse, Berne, Switzerland

SCNA and Swisscom AG have no interlocking directorates with other carriers.

SCNA certifies pursuant to §§ 1.2001 through 1.2003 of the Commission's Rules that neither it nor Swisscom AG are subject to denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

A handwritten signature in black ink, appearing to read "K. Schaefer", written over a horizontal line.

Konnie Schaefer
Chairman & CEO
Swisscom North America



2 Carter's Bay Road, Southside, St. David's DD 02 • Tel: 441 296-9000, Fax: 441 296-9010
P.O. Box DD 141, St. David's DD BX, Bermuda

CERTIFICATION

TeleBermuda International Limited ("TeleBermuda") is a corporation organized under the laws of Bermuda and is licensed as a carrier in Bermuda and the United States to provide telecommunications services between international points. TeleBermuda, in conjunction with its application for the TAT-14 Cable Network submarine system, hereby certifies that it has no affiliation with any foreign carrier as defined under Section 63.18(h)(1) of the Commission's Rules.

The name, address, citizenship and principal businesses of TeleBermuda's ten- percent or greater direct or indirect shareholders are as follows:

Name	Address	% Interest	Citizenship	Principal Business
Oppenheimer Co. Inc.	200 Liberty Street 1 World Financial Center New York, NY 10281	16.8%	USA	Fund Manager
TeleBermuda (B.V.I.) Limited ¹	Todman Building Main Street P.O. Box 3140 Road Town Turtola, B.V.I.	15.4%	B.V.I.	Owns Interest In TeleBermuda

TeleBermuda certifies that it has no interlocking directorates with other carriers and also is not subject to denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

TeleBermuda International Limited

Lin Gentemann, General Counsel

¹ A majority of the voting interest in TeleBermuda (BVI) Limited is held by Michael Kedar, Chairman and CEO of TeleBermuda. Mr. Kedar is a citizen of Canada.

CERTIFICATION UNDER FCC RULES 1.2001-12003

Teleglobe USA Inc. (TUSA) hereby certifies that it is not subject to a denial of Federal benefits that include FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

CERTIFICATION UNDER FCC RULES 63.18(h)

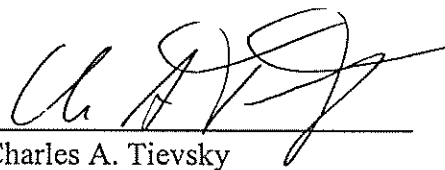
TUSA is affiliated with foreign carriers as described in its notifications previously filed with the Commission (FCN-98-004; FCN-NEW-19981124-0041). TUSA carrier affiliates operate as non-dominant carriers in the U.K, Germany, France, Spain and other European markets.

The 10% or greater shareholders of Teleglobe Inc. are Troutt Partners, Ltd. and BCE Inc.

CERTIFICATION UNDER FCC RULE 63.01(1)

Teleglobe certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier or administration, in a manner contrary to the Commission's policies, with respect to traffic or revenue flows between the U.S. and any foreign country which TUSA may serve under authority granted pursuant to part 63 of the Commission's Rules, and TUSA has not agreed to enter into such agreements in the future.

TELEGLOBE USA INC.

By: 
Charles A. Tievsky

Date: February 9, 1999

CERTIFICATION

Telenor Global Services AS ("Telenor Global"), in conjunction with its application for the TAT-14 Cable Network submarine cable system, hereby certifies that it is affiliated with the following foreign carriers (which were previously disclosed to the Commission in connection with Telenor's application for a Section 214 authorization, granted in ITC 98-191, by Public Notice dated April 16, 1998.

Telenor Global is a foreign carrier in Norway. Norway is a member of the World Trade Organization and has opened its telecommunications markets to competition. Telenor Global is also affiliated with Storm Telecommunications Ltd. ("Storm") (formerly called Andrella Ltd.). Storm is based in the United Kingdom, and has limited market share. The United Kingdom is a member of the World Trade Organization. Telenor Global may be deemed to be affiliated with Telenordia AB, which is jointly owned by Telenor Global's parent, Tele Denmark and British Telecom. Telenordia AB is a Swedish operator and supplier of international and domestic voice and data services. It does not have a dominant position in the Swedish market. Sweden is a member of the World Trade Organization.

Telenor Global is a corporation organized under the laws of Norway. Telenor Global is a wholly owned subsidiary of Telenor AS, a Norwegian corporation. Telenor AS is a Norwegian holding company, which is owned by the Norwegian government. Its address is P.O. Box 6701 St. Olavs plass, N-0130 Oslo, Norway.

Telenor Global certifies pursuant to Sections 1.200 through 1.2003 of the Commission's Rules that it is not subject to denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

Telenor Global Services AS

By: Morten Tenes

Title Acting C.E.O.

Feb. 23rd, 1999



CERTIFICATION UNDER SECTION 1.2001-1.2003

In accordance with Section 1.2001-1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-03, Telia North America ("Telia NA") certifies that it is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

CERTIFICATION UNDER SECTION 63.18(h)

63.18(h)(1). Telia NA certifies that it has previously notified the Commission that it is affiliated with the following foreign carriers: Telia AB of Sweden, Telia U.K. Ltd of the United Kingdom, Telia AS of Denmark, Telia AS of Norway, Telivo Ltd. of Finland, Telia Latvia SIA of Latvia, and Suntel of Sri Lanka. See Foreign Carrier Affiliation Notification, Public Notice, FCN-97-012, (rel. Sept. 25, 1997); Foreign Carrier Affiliation Notification, Public Notice, FCN-96-28 (rel. Nov. 15, 1996).; Telia North America, ITC-96-545, DA 97-511 (rel. Mar. 11, 1997). Telia NA also has filed a notification with the Commission indicating that it is affiliated with Lietuvos Telekomas and UAB Omnitel of Lithuania. See Telia North America, Notification of Foreign Affiliation, FCN-NEW-19981002-00033 (filed Aug. 7, 1998).


63.18(h)(2). Telia NA certifies it is a corporation organized under the laws of the State of Delaware. Telia NA further certifies that all of its shares are owned by Telia AB, which provides telecommunications services and is organized under the laws of Sweden, which is a WTO Member Country. All of the shares of Telia AB, in turn, are owned by the Government of Sweden. Telia AB is located at the following address: S-123 86, FARSTA, SWEDEN. Telia NA has no interlocking directorates.

CERTIFICATION UNDER SECTION 63.18(i)

Telia NA has not agreed, and will not agree in the future, to accept any 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.

Respectfully submitted,

TELIA NORTH AMERICA, INC.

By: 
Magnus Kjell, President

Telia North America, Inc.

Main Office
8133 Leesburg Pike
Suite 400
Vienna, VA 22182

Telephone
+1.703.288.1500

Fax
+1.703.288.9480

CERTIFICATION

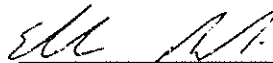
I, Ellen Rudin, Vice President and Deputy General Counsel of Viatel, Inc. ("Viatel"), hereby certify as follows in connection with Viatel's application for the TAT-14 Cable Network submarine cable system:

1. Viatel is affiliated with the following foreign carriers: (a) Viatel U.K. Limited in the United Kingdom; (b) Viaphone GmbH in Germany; (c) Viatel Operations SA in France; (d) Viafoperations Communications BV in the Netherlands; (e) Viatel Belgium nv in Belgium; (f) Viaphone A.G. in Switzerland; and (g) Viatel (I) Limited in Ireland. Each of these new entities is a new entrant in its respective market, has no market power, and no ability to discriminate against unaffiliated United States carriers.

2. Viatel's only 10% or greater direct or indirect holders of its outstanding stock are: (a) Martin Varsavsky, Parque Empresarial Edificio 2, c/o Beatriz De Bobadilla, 14, 5 Offic. B, Madrid, Spain; and (b) the Capital Guardian Trust Company, 11100 Santa Monica Boulevard, Los Angeles, CA 90025-3384, as a result of it serving as the investment manager of various institutional accounts. Mr. Varsavsky is a U.S. citizen and is currently the president of a Spanish telecommunications company.

3. Viatel has one (1) interlocking directorate. As reported to the Federal Communications Commission, Michael Mahoney is a director, and chief executive officer and president of Viatel, Inc., and a director of Cignal Global Communications, Inc.

4. Viatel is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.



Ellen Rudin, Esq.
Vice President and Deputy General
Counsel
Viatel, Inc.

Dated: March 1, 1999

SCHEDULE A**TAT-14 CABLE NETWORK****PARTIES TO THE AGREEMENT**

ABS Telecom plc, having an office at ABS House, 607 High Road, London N12 OD2, England (herein called „ABS“, which expression shall include its successors).

AT&T Corp., a corporation organized and existing under the laws of the State of New York and having its principal office at 340 Mount Kemble Avenue, Morristown, New Jersey 07960, USA (herein called "AT&T" which expression shall include its successors).

BC TEL, having an office at 21-3777 Kingsway, Burnaby, B.C., Canada V5H 3Z7 (herein called „BC TEL“ which expression shall include its successors).

Belgacom S.A. of public law, a company existing under the laws of Belgium, whose registered office is at 177, Boulevard E. Jacquain, 1030 Brussels, Belgium, (herein called "Belgacom", which expression shall include its successors).

BellSouth International, Inc., a corporation organized and existing under the laws of the State of Georgia in the United States of America and having its principal office at 1100 Peachtree St., NE, Atlanta, Georgia 30309 (herein called "BSI", which expression shall include its successors).

British Telecommunications plc, a public limited company, registered in England (No 1800000) whose registered office is at 81 Newgate street, London, EC1A 7AJ, England (herein called "BT", which expression shall include its successors).

Cable & Wireless Global Network Organization Limited, registered in Ireland (No 282637) whose registered office is at 6 Fitzwilliam Square, Dublin 2, Ireland (herein called "C&W", which expression shall include its successors) on its own behalf and as agent for Mercury Communications Limited.

Cable & Wireless, Inc., a corporation organized and existing under the laws of the District of Columbia having its principal office at 8219 Leesburg Pike, Vienna, Virginia 22182, USA (herein called "C&W USA", which expression shall include its successors).

Carrier1 AG, a limited liability company, registered in Switzerland whose registered office is at Militarstrasse 36, CH 8004 Zurich, Switzerland, (herein called "Carrier1", which expression shall include its successors) for the use of its wholly owned or affiliated companies.

COMPANHIA PORTUGUESA RADIO MARCONI, SA., a corporation organized and existing under the laws of Portugal, having its main office at Av. Alvaro Pais, 2, 1699 Lisboa Codex, Portugal, (herein called "MARCONI", which expression shall include its successors).

Com Tech International Corporation, a Washington corporation, whose corporate office is at 6001 Broken Sound Parkway NW, Suite 400, Boca Raton, Florida 33487, USA (herein called "ComTech", which expression shall include its successors).

CYPRUS TELECOMMUNICATIONS AUTHORITY, a corporate body established by law, having its main office at Telecommunications Street, P.O. Box 4929, CY-1396, Nicosia, Cyprus, (herein called "CYTA", which expression shall include its successors).

Deutsche Telekom AG, a company existing under the laws of the Federal Republic of Germany and having its registered office at Friedrich-Ebert-Allee 140, 53113 Bonn Germany (herein called "DTAG", which expression shall include its successors).

Energis Communications Limited, a limited company, registered in England and Wales (No. 2630471) whose registered office is at Carmelite, 50 Victoria Embankment, London EC4Y 0DE, England (herein called "Energis", which expression shall include its successors).

Emirates Telecommunications Corporation - ETISALAT, a corporation having its principal office at Sh. Rashid Bin Saced Al Maktoum St. P.O. Box 3838, Abu Dhabi, United Arab Emirates (herein called "ETISALAT", which expression shall include its successors).

France Telecom, a Public Company with a share capital of 25,000,000,000 French Francs registered with the Paris Trade Register under number 380 129 886 RCS Paris, whose head office is at 6 Place d'Alleray, 75505 Paris Cedex 15, France (herein called "FRANCE TELECOM" or "FT", which expression shall include its successors).

GTE Intelligent Network Services Incorporated, organized and existing under the laws of Delaware and having its principal office at 5525 MacArthur Boulevard, Irving, Texas, 75038 USA (herein called "GTE", which expression shall include its successors) for the use of its wholly owned or otherwise affiliated authorized international carriers.

Hellenic Telecommunications Organization S.A., having its main office at 15 Stadiou Street, GR-10246, Athens, Greece (herein called "OTE", which expression shall include its successors).

IXC Communications, Inc., a corporation having its principal office at 1122 Capital of Texas Hwy, South Austin, TX 78746, USA (herein called "IXC", which expression shall include its successors).

IXNET Limited, a limited company, registered in England whose registered office is at Duke's Gate, Acton Lane, Chiswick Park, London, W4 5DX, England (herein called "IXNET", which expression shall include its successors).

Japan Telecom Co., Ltd., a corporation having its principal office at 7-1, Hatchobori 4-Chome, Chou-ku, Tokyo, 104-8508, Japan (herein called "JT", which expression shall include its successors).

Kokusai Denshin Denwa America, Inc., having its office at 375 Park Avenue, 7th Floor, New York, New York 110152, USA (herein called "KDD America", which expression shall include its successors).

KPN Telecom B.V., a limited company existing under the laws of the Netherlands, having a registered office at Prinses Beatrixlaan 23, 2595 AK, The Hague, the Netherlands (herein called "KPN", which expression shall include its successors).

MCI International Inc., a corporation organized and existing under the laws of the State of Delaware and having its principal office at 2 International Drive, Rye Brook, New York, United States of America (herein called "MCI", which expression shall include its successors) for the use of its wholly owned or otherwise affiliated authorized international carrier.

NTT Worldwide Network Corporation, a corporation organized and existing under the laws of Japan and having its registered addresses at 20-2 Nishi-shinjuku 3-chome Shinjuku-ku, Tokyo, 163-1439, Japan (herein called "NTT-WN", which expression shall include its successors).

Oy Finnet International AB, a corporation organized and existing under the laws of Finland, having its main office at Runeberginkatu 5, Helsinki, Finland (herein called "FINNET", which expression shall include its successors).

Pacific Gateway Exchange, Inc., a corporation organized and existing under the laws of the state of Delaware whose office is at 533 Airport Boulevard Suite 505, Burlingame, California 94010, USA (herein called "PGE", which expression shall include its successors).

Pacific Gateway Exchange (Bermuda) Limited, (a wholly-owned subsidiary of Pacific Gateway Exchange, Inc., a corporation organized and existing under the laws of the state of Delaware) whose registered office is at Conyers Dill Pearman, Clarendon House, 2 Church Street, Hamilton HM11, Bermuda and whose mailing address is at 533 Airport Boulevard Suite 505, Burlingame, California 94010, USA (herein called "PGE-Bermuda", which expression shall include its successors).

Rostelecom, an Open Joint Stock Company for long-distance and international telecommunications existing under the laws of Russia, having its main office at Delegatskaya St. 5, 103091, Moscow, Russia (herein called "Rostelecom", which expression shall include its successors).

RSL Communications Limited, a facilities based international long distance telecommunications company, incorporated in Bermuda with global headquarters in New York, USA and in the UK, at Victoria House, London Square, Cross Lanes, Guildford, Surrey GU1 1UN, England (herein called "RSL COM", which expression shall include its successors).

Singapore Telecommunications Limited, a company incorporated under the laws of the Republic of Singapore, and having its registered office at 31 Exeter Road, Singapore 239732 (herein called "SINGTEL", which expression shall include its successors).

Slovenske Telekomunikacie s.e., an entity organized and existing under the laws of the Slovak Republic and having its principal office at Namestie slobody 6, SK-817 62, Bratislava, Slovak Republic (herein called "STSE", which expression shall include its successors).

Sonera Ltd., a corporation organized and existing under the laws of Finland, having its principal office at Teollisuuskatu 15, 00510 Helsinki, Finland (herein called "Sonera", which expression shall include its successors).

Sprint Communications Company L.P., a limited partnership organized and existing under the laws of the State of Delaware and having its principal office at 8140 Ward Parkway, Kansas City, Missouri 64114, USA (herein called "SPRINT", which expression shall include its successors) for the use of its wholly-owned or otherwise affiliated authorized international carriers.

STAR Telecommunications Inc., a corporation existing under the laws of the State of Delaware and having its principal place of business at 223 E. De La Guerra Street, Santa Barbara, California, USA 93101 (herein called "STAR", which expression shall include its successors).

StarHub Pte Ltd, having an office at 3 Lim Teck Kim Road, # 10-02 Singapore Technologies Building, Singapore 088934 (herein called "StarHub", which expression shall include its successors).

STARTEC GLOBAL COMMUNICATIONS CORPORATION, a corporation organized and existing under the laws of the State of Maryland, USA, and having its head office at 10411 Motor City Drive, Bethesda, MD 20817, USA (herein called "STGC", which expression shall include its successors and assigns).

Swisscom Ltd, a company existing under the Swiss laws, having its office at Viktoriastrasse 21, 3050 Berne, Switzerland (herein called "Swisscom", which expression shall include its successors).

Swisscom North America Inc., a corporation organized and existing under the laws of the state of Delaware having its office at 2001 L Street NW, Suite 600, Washington, DC 20036, USA (herein called "SCNA", which expression shall include its successors).

TELE2 AB, a limited company organized under the laws of Sweden, having its office at Borgarfjordgatan 16, PO Box 62, S-16494 Kista, Sweden (herein called "Tele2", which expression shall include its successors).

TeleBermuda International Limited, a corporation organized and existing under the laws of Bermuda and having its principal office at Mintflower Place 8, Par-la-Ville Road, Hamilton HM 08, Bermuda, (herein called "TBI", which expression shall include its successors).

Tele Danmark A/S, a limited company registered in Denmark (No. 193447), whose registered office is at Kannikegade 16, DK-8000 Aarhus C, Denmark (mailing address Carrier Services, Telegade 2, DK-2630 Taastrup) (herein called "TDK", which expression shall include its successors).

Telefónica de España, S.A., a corporation organized and existing under the laws of Spain and having its principal office at Gran Via 28, Madrid, Spain, (herein called "TLFN", which expression shall include its successors).

Teleglobe USA, a corporation organized and existing under the laws of the state of Delaware having an office at 1000 de la Gauchetiere Street W., Montreal, Quebec H3B 4X5, Canada (herein called "Teleglobe USA", which expression shall include its successors).

Telenor Global Services AS, a wholly owned subsidiary of Telenor AS, a company organized as a state owned limited company existing under the laws of Norway, having its principal office at Universitetsgata 2, N-0130 Oslo, Norway (herein called "Telenor", which expression shall include its successors) for the use of its subsidiaries, affiliates and where Telenor is authorized as an international carrier.

Telesur, a company organized under the laws of Suriname and having an office at Heiligenweg No. 2, P.O.Box 1839, Paramaribo, Suriname (herein called „TELESUR) which expression shall include its successors).

Telia AB (publ), a public limited company, having its registered office at Márbackagatan 11, SE-123 86 Farsta, Sweden (herein called "Telia", which expression shall include its successors).

Telia North America Inc., a company organized and existing under the laws of the State of Delaware, USA and having its principal office at 8133 Leesburg Pike, Suite 400, Vienna, Virginia, USA (herein called "TNA", which shall include its successors).

Transoceanic Communications Incorporated, a wholly owned subsidiary of AT&T, a corporation organized and existing under the laws of the State of Delaware and having an office at 340 Mount Kemble Avenue, Morristown, New Jersey 07960, USA (herein called "TOCI", which expression shall include its successors).

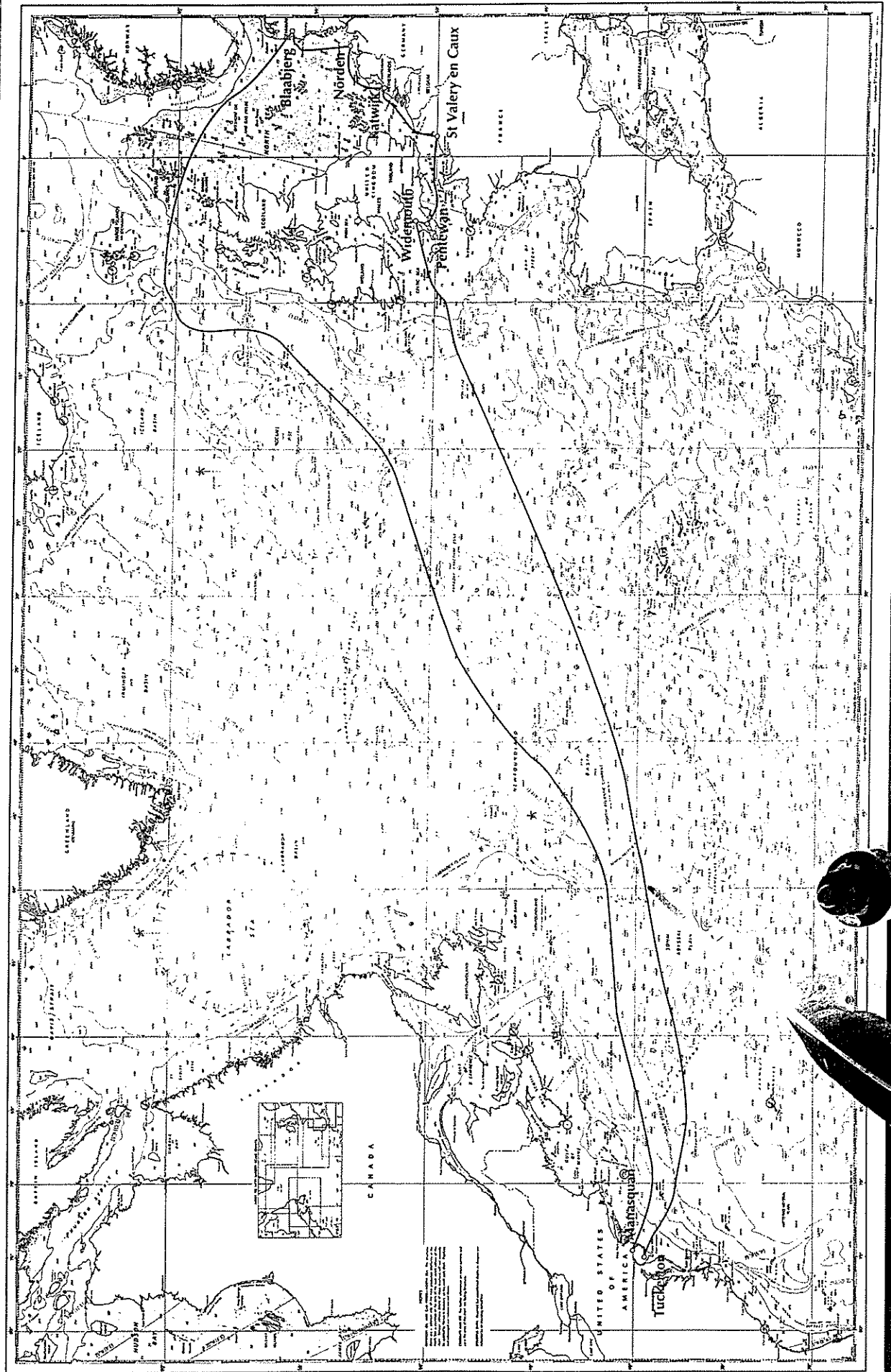
Turk Telekomunikasyon A.S., a corporation organized and existing under the laws of Turkey, having its main office at Turgut Ozal Bulvari, 06103 Aydinlikevler-Ankara, Turkey (herein called "TURK TELECOM", which expression shall include its successors).

Ultraline (Bermuda) Limited, a Bermuda exempt company, a wholly owned subsidiary of Level 3 Communications, LLC., organized and existing under the laws of Delaware and having its principal office at 3555 Farnam Street, Omaha, Nebraska, 68131, USA, for the use its wholly owned or otherwise affiliated authorized international carriers (herein called "Ultraline", which expression shall include its successors).

VIATEL INC., a Delaware corporation with its executive offices located for the use of its wholly owned subsidiaries, or , affiliated entities at 800 Third Avenue, New York, NY, USA (herein called "VIATEL", which expression shall include its successors).

Videsh Sanchar Nigam Limited, having its main office at Videsh Sanchar Bhavan, Mahatma Gandhi Road, Fort, Mumbai 400001, India (herein called "VSNL", which expression shall include its successors).

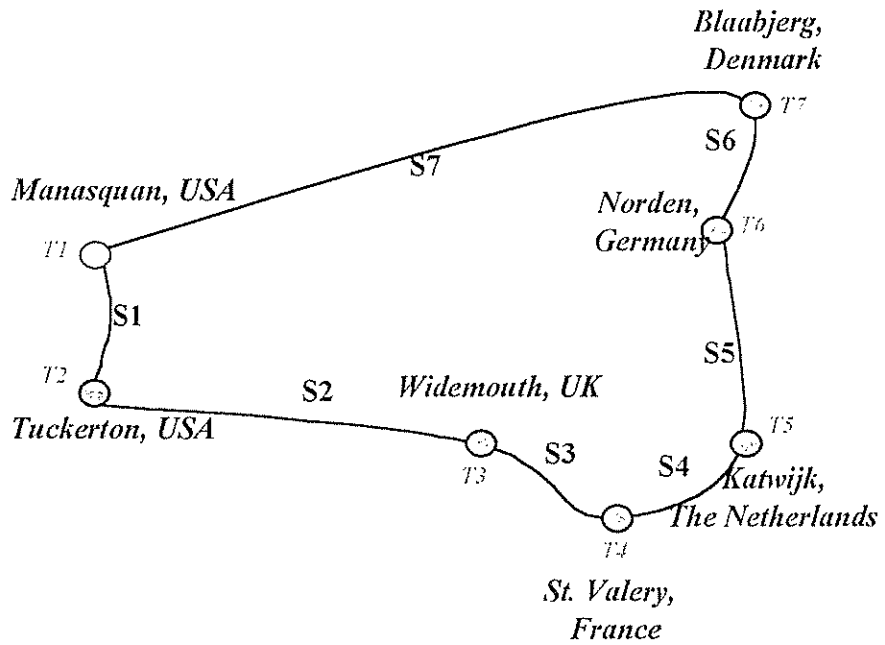
T-1A Cable Network



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TAT-14 CABLE NETWORK

CONSTRUCTION AND MAINTENANCE AGREEMENT



Certified to be a true and complete copy of the original document in the custody of Deutsche Telekom

Volkmar Römpke

Carmen Bornefeld

Deutsche Telekom AG, Friedrich-Ebert-Allee 140, 53113 Bonn, Germany