

Catherine Wang
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May 2, 2007

Via Electronic Filing and FedEx

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Boston
Hartford
London
Los Angeles
New York
Orange County
San Francisco
Silicon Valley
Tokyo
Walnut Creek
Washington

Chairman Sandra Kyle
c/o Sharla Dillon, Dockets and Record Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

07-00104

Re: Application of Startec Global Operating Company for a Certificate to Resell Telecommunication Services in Tennessee.

Dear Chairman Kyle:

On behalf of Startec Global Operating Corporation ("Startec" or "Applicant"), enclosed for filing are an original and four (4) copies of the above-referenced Application. Also enclosed is a check in the amount of \$50.00 to cover the filing fee.

Applicant requests confidential treatment of Exhibit J - Financial Statements. The Financial Statements contain commercially sensitive and competitively significant information that is not otherwise released to the public. Unrestricted availability of this information would provide competitors with knowledge that would be otherwise unavailable and could place Applicant at a competitive disadvantage. Confidential and trade secret treatment is therefore required to avoid commercial and competitive injury.

Please date-stamp the enclosed extra copy of this filing and return it in envelope provided. Should you have any questions concerning this filing, please do not hesitate to contact Brett Ferenchak at (202) 373-6697.

Respectfully submitted,



Catherine Wang
Brett Ferenchak
Jeffrey Strenkowski

Enclosures

**APPLICATION FOR CERTIFICATE
TO PROVIDE OPERATOR SERVICES AND/OR
RESELL
TELECOMMUNICATION SERVICES IN TENNESSEE
SECTION A**

Application is hereby made for a certificate of authority pursuant to TRA Rule 1220-4-2-.57 to provide telecommunications services in the State of Tennessee.

Part I : General Information

A. Name of Applicant Startec Global Operating Company ("Startec")
Full exact name of person, corporation, partnership, sole proprietorship, or other entity, for which application is made.
7361 Calhoun Place, Suite 650, Rockville, MD 20855
Legal name of applicant, if different from above.

Address	City	State	Zip
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Tenn. Secretary of State Certificate of Authority ID 0354280

Federal Taxpayer ID Number 52-2099558

Any trade name(s), assumed name(s) or fictitious name(s) used by applicant:

Startec

If applicant has affiliate(s) engaged in providing telecommunications services, provide the above requested information for each affiliate(s), as well as for the applicant.

Address City
State Zip Code Phone No. () -
(Use additional pages if necessary)

*****IMPORTANT INFORMATION*****

If applicant has affiliate(s) or parent company, or constituency corporations, engaged in providing telecommunications services, or operating under any trade name, assumed name or fictitious name used by the above, provide the above requested information on all parts of this application as well as for the applicant. Provide this information on a separate attachment, if necessary.

THIS SECTION FOR TRA USE ONLY

Docket Number.

Company ID Number
Date Approved
Evaluator

- B. Describe other businesses or business transactions, if any, at the same location as the principal business address:

The operations of Startec and its parent holding company, Startec Global Communications Corporation, are the only businesses at the same location as the principal business address.

- C. Provide the name, business address and a chronological summary of the employment history and business experience over the preceding eight years of:

- (a) The proprietor, if the applicant is an individual;
- (b) Every member, if the applicant is a partnership;
- (c) Each Executive Officer, Director and each Key Stockholder if the applicant is a joint stock association or a corporation. (Note: If the applicant is a publicly traded corporation or a subsidiary of such a corporation it does not need to provide this information.)
- (d) Any person in a position to exercise control over or direction of, the business of the applicant, regardless of the form of organization of the applicant.

Information to be included:

NAME TITLE

BUSINESS ADDRESS

PHONE NO.

EMPLOYMENT HISTORY (with details of duties/responsibilities for each position held)

Provide the above requested information on separate attachments.

- D. Has the applicant or any of its parent companies, subsidiaries, affiliates, owners, partners, LLC members, directors, officers, five percent (5%) more shareholders or beneficiaries (of a trust) been associated with a business whose authority to transact business was denied, revoked or suspended by a state or federal regulatory or law enforcement entity?

☒ Yes ☐ No If yes, please explain fully.

- E. Has the Tennessee Regulatory Authority, or any other agency of the State of Tennessee, any federal agency or any agency of any other state ever initiated a regulatory action or order against the applicant or any of its parent companies, subsidiaries, affiliates, owners, partners, LLC members, directors, officers, five percent (5%) more shareholders or beneficiaries (of a trust)?

☐ Yes ☒ No If yes, please explain fully.

- (1) Has the applicant or any of its parent companies, subsidiaries, affiliates, owners, partners, LLC members, directors, officers, five percent (5%) more shareholders or beneficiaries (of a trust), been enjoined or restrained by order by any court or state or federal regulatory or law enforcement entity from engaging in any conduct or practice related to the telecommunications business?

☐ Yes ☒ No If yes, please explain fully.

- F. Has the applicant or any of its parent companies, subsidiaries, affiliates, owners, partners, LLC members, directors, officers, five percent (5%) more shareholders or beneficiaries (of a trust) been associated with a business who has ceased providing telecommunications services in any state?

☐ Yes ☒ No If yes, please explain fully and describe the circumstances. (Use additional pages if necessary)

- G. Has the applicant or any of its parent companies, subsidiaries, affiliates, owners, partners, L.L.C. members, directors, officers, five percent (5%) or more shareholders or beneficiaries (of a trust) been convicted of any crime or crimes, or charged in court with any fraudulent or dishonest acts in any transaction of any kind, or confined in any penal institution? If so, list such persons, give details, state results and final outcome. **(Use additional pages if necessary)**

No such convictions.

- (1) Has the applicant or any of its parent companies, subsidiaries, affiliates, owners, partners, L.L.C. members, directors, officers, five percent (5%) or more shareholders or beneficiaries (of a trust) been indicted, convicted, pled guilty or pled nolo contendere to a felony in Tennessee or elsewhere?

☐ YES ☒ NO If yes, please explain fully.

- H. Name and telephone number of contact person authorized to respond to Authority inquiries regarding company operations Monday through Friday.

Robert Felgar

Name

(301)610 4646

Phone No.

(240) 314 4219

Fax No.

(800) 827-3374

e-mail Address Robert.Felgar@startec.com

- (1) Name and telephone number of contact person authorized to respond to Authority inquiries regarding this filing Monday through Friday.

Brett P. Ferenchak

Name

(202)373 6697

Phone No.

202 373 6000

Fax No.

(800)

e-mail Address brett.ferenchak@bingham.com

- I. List a toll-free telephone number and mailing address that consumers can call or write to report service problems and/or request refunds or adjustments.

800-827-3374

PHONE NUMBER

301-610-4305

ALTERNATE PHONE NUMBER

7361 Calhoun Place, Suite 650 Rockville, MD 20855

ADDRESS

CITY

ST

ZIPCODE

- (J) Provide the name and address of the registered agent for service of process:

CSC

2908 Poston Avenue, Nashville, TN 37203

- (K) Identify all authorized agents in the state, if any by name, address, business and home phone numbers and any other businesses conducted by the agent at the same location: (use additional sheets if necessary)

Part II:

- A. Check the type of telecommunication services you plan to provide in Tennessee.

☒ Resell Interexchange long distance services

☐ Operator Services

☐ Resell local services

☐ Other (describe)

- B. If providing operator services, list company name, address and contact person for all reseller carriers you serve in Tennessee. **Provide the above information on Appendix I.**

- C. List the state(s) where the applicant, its parent company, and all affiliates is authorized to operate in at this time. For each such state, describe applicant's current activities along with a history of operations there. (Use additional pages if necessary.)

See attachment.

For the above states, list the number and types of complaint(s) filed against applicant, and the complaint(s)' current status. Provide this information on a separate attachment, if necessary.

If applicant has affiliate(s) or parent company, or constituency corporations, engaged in providing telecommunications services, or operating under any trade name, assumed name or fictitious name used by the above, provide the above requested information for all as well as for the applicant. Provide this information on a separate attachment, if necessary.

- D. List any states that the applicant or any affiliate, parent company, or constituency corporation operating under any trade name, assumed name, or fictitious name, has been denied authority to provide service. (Use additional pages if necessary)

Startec has not been denied authority to provide service in any state.

- E. Areas in Tennessee to be served.

Startec intends to provide services throughout the state of Tennessee.

- F. What type of customers will the applicant serve?

a. Business ☒

b. Residential ☒

c. Aggregators ☐

(e.g. Hotels, Payphones)

d. Other (specify)

- G. Does the applicant allow a property imposed fee (PIF) to be added to the price of intrastate telephone calls over its network? If yes, specify amount. None

- H. Are your prices for intrastate services plus any PIF equal to or less than the dominant carriers' price for similar services? Yes ☐ No ☐

- I. Describe the type of services and price that the applicant will be offering in Tennessee on the Informational Tariff Form found in Appendix II¹.

- J. What is the applicant's 10XXX or 800 access code, if applicable? 1016868 & 1010719

- K. Does the applicant now have or plan to have any telecommunication's facilities (e.g. switches, fiber lines) in Tennessee?

Startec does not have, nor does it plan to have any telecommunications facilities in Tennessee.

¹Applicant is required to fill out an Informational Tariff form. Failure to fill out this form will cause the applicant's request to be rejected.

- L. Whose facility-based network(s) will the applicant be reselling?

Broadwing

- M. Will the applicant be utilizing the local telephone company's billing system or billing customers directly?¹

Startec bills its presubscribed customers directly, but its dial-around customers are billed by their local exchange carrier.

- N. Describe briefly how the applicant plans to market their services in Tennessee?

Startec acquires customers in the following ways: (1) Internet advertising and Startec website; (2) Direct mail; (3) TV and newspaper advertising; and (4) telemarketing. Startec is aware of and will abide by the Tennessee Do-Not-Call Requirements in Tenn. Code Ann. 65-4-401.

- O. If independent telemarketers are to be used, list the name, contact person, address phone number and federal taxpayer ID for each company.

COMPANY NAME	CONTACT	ADDRESS	CITY	ST	ZIP	PHONE

COMPANY NAME	CONTACT	ADDRESS	CITY	ST	ZIP	PHONE

COMPANY NAME	CONTACT	ADDRESS	CITY	ST	ZIP	PHONE

- P. Describe the methods and procedures by which the applicant will use to switch a consumer's preferred interexchange service, and to prevent unauthorized switching of a consumer's interexchange service. Use additional pages if necessary. If you have written procedures or company guidelines, attach copies.

In order to prevent unauthorized switching, Startec uses third-party and electronic verification of customer procedures to confirm customer orders in compliance with TRA and FCC rules. While Startec does not have any written procedures, Startec has a script that its third-party verification company must use.

- Q. Applicant has the ability and agrees to honor the form of call blocking that the consumer has subscribed to with their local telephone company. Yes ☒ No ☐

- R. Applicant gives permission to the local telephone company to provide the Authority a periodic sample of the reseller's intrastate toll calls. The purpose of this analysis is to audit the reseller's rates to assure they are at or below the dominant carrier's tariffed rates. Yes ☒ No ☐

- S. Is the Applicant aware of the requirement to insure that any telephone call made between two points in the same county in Tennessee shall be classified as toll-free and not billed to any customer pursuant to Tennessee Code Annotated § 65-21-114? Yes ☒ No ☐

- T. Is the Applicant aware of the TAR Code data base maintained by BellSouth, its use to insure compliance with T.C.A. § 65-21-114 and the procedures used to enter telephone numbers in that data base? Yes ☒ No ☐

- U. How does the Applicant intend to comply with T.C.A. § 65-21-114? In your response, please explain technically, what procedures the Applicant will use to insure it will not bill for any county wide calls in Tennessee. Use additional pages if necessary.
Applicant will use the TAR Code data base to determine which calls are county wide calls and then remove those calls from its long distance billing records.

¹A copy of a bill is required if the applicant is going to bill the customer directly.

Part III: Organization Structure

A. Applicant's organizational structure

☒ Corporation

☐ Publicly Traded Corporation

☒ Subsidiary of a Publicly Traded Corporation

☐ Limited Liability Corporation Attach a copy of the articles of organization and operating agreement along with amendments.

☐ Other Form of Corporation

List type _____ (Example S Corporation)

Attach a copy of the charter, bylaws and/or certificate of incorporation.

_____ Association

Attach a copy of the charter, bylaws and/or certificate of incorporation and Letter of Authorization from Tennessee Secretary of State

_____ Joint Stock Association

Attach a copy of the charter, bylaws and/or certificate of incorporation and Letter of Authorization from Tennessee Secretary of State.

_____ Trust

Attach a copy of the trust agreement and Letter of Authorization from Tennessee Secretary of State.

_____ Individual

Attach a copy of the Letter of Authorization from Tennessee Secretary of State

SECTION (a)-(g) is to be completed if applicant is a Corporation Association or Trust

(a) The date and state of formation/incorporation: April 21, 1998, Delaware

(1) Parent Company, if applicable Startec Global Communications Corporation

(b) Attach a certificate of good standing from the state in which the applicant was incorporated/formed.

(1) Attach a copy of Certification of Authority issued by Tennessee Secretary of State showing corporation's authority to engage in business in Tennessee.

(d) Describe the corporate structure of the applicant, including the identity of any parent or subsidiary of the applicant. Disclose whether any parent or subsidiary is publicly traded on any stock exchange.

(e) Provide the history of material litigation and criminal convictions of every current director, executive officer, or key shareholder of the applicant for the ten-year period prior to the date of this application.

(f) If applicable, attach a copy of the instrument creating the trust and all amendments thereto:

B. ☐ Proprietorship

☐ Partnership

- ☐ General Attach a copy of the partnership agreement along with any amendments.
- ☐ Limited Attach a copy of the certificate of limited partnership and the partnership agreement along with any amendments.
- ☐ Other (Explain on separate sheet)

All of the above will be required to submit a valid business license.

- (a) Identify the place and date of the applicant's qualifications to provide telecommunications services in this state.
- (b) List the full name, social security number and address of the owners, if a sole proprietorship, or all partners identifying the percentage of ownership:
ATTACH ADDITIONAL PAGES AS NECESSARY

C. Number of employees: 98.

Employer Identification Number (E.I.N.)

Part IV: Financial Information

A. Address where business records are kept: 7361 Calhoun Place, Suite 650

Rockville	MD	20855	301-610-4300
CITY	STATE	ZIP CODE	PHONE NUMBER

B. Attach a copy of the applicant's most recent unconsolidated and consolidated audited financial statements for the immediately preceding three-year period. Provide in detail the applicant's financial condition, including balance sheet and income statement, or a copy of IRS form 1120 or 1065 filed by your business for the previous year. Attach, if available, a copy of your company's 10K and/or stockholder reports.

(1) Fiscal year end: Month December Day 31

(2) Date of most recent audited, unconsolidated financial statement of Applicant:
June 12, 2006

(3) If applicable, name and address of independent certified public accountant:

Mayer Hoffman McCann P.C.
 7475 Wisconsin Avenue, Suite 700
 Bethesda, MD 20814

(4) Period covered by financial statement attached: Year Ending 12/31/2005, and April - Dec. 2004

C. Does the applicant currently have an internal auditor and/or internal audit program? No

If so, Name of internal auditor .

D. If applicable, provide a history of applicant's material litigation and criminal convictions for the ten-year period prior to the date this application is made. Material litigation is defined as any litigation that, according to generally accepted accounting principles, is deemed significant to a person's financial health and would be required to be referenced in annual audited financial statements, reports to shareholders or similar documents.

Part VI: Rule Compliance Agreement

- A. Attach a copy of a Small and Minority-Owned Telecommunications Business Participation Plan Pursuant to Tennessee Code Annotated § 65-5-212.
- B. Have you read and understand the Tennessee Regulatory Authority's (TRA) Rules and Regulations for Resellers, 1220-4-2 located at the TRA's website <http://www.state.tn.us/tra> *electronic filerom* in its entirety?
☒ Yes ☐ No
- C. Do you understand the penalties for non-compliance, and all associated fees to provide such service? ☒ Yes ☐ No

Mail the completed application and a check for \$50.00 to: Tennessee Regulatory Authority, P.O. Box 198907, Nashville, TN 37219-8907. Should you have any questions, call (615) 741-7489, ext. 163.

The Reseller or Operator Service Provider applicant, hereby, affirms the following:

Will comply with the TRA Reseller Rules and all other applicable Authority Rules and state laws, including T.C.A. Section 65-5-206 located at the TRA's website <http://www.state.tn.us/tra> *electronic filerom* under the External Site of Lexis Law Publishing.

Having been duly sworn, and under the penalties of perjury, I hereby certify that the representations in this RESELLER APPLICATION and all attachments and appendices are true and correct to the best of my knowledge and belief. I further understand that omissions or inaccuracies may result in denial of the APPLICATION and grounds for revocation of Certificate of Authority.

For Individual and Partners:

_____ Signature	_____ Signature
_____ PRINTED NAME	_____ PRINTED NAME
_____ Signature	_____ Signature
_____ PRINTED NAME	_____ PRINTED NAME

For Corporations
and Other Organizations

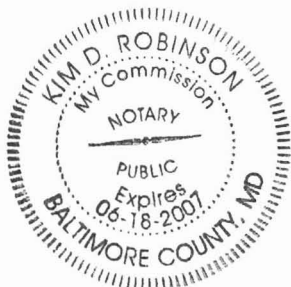
BY: Startec Global Operating Company
(NAME OF CORPORATION)
Robert Felgar
SIGNATURE
Robert Felgar
PRINTED NAME
General Counsel & Secretary
Title

ATTEST:

Title

On this the 30th day of April, 2007 before me, a Notary Public

known to me to be the person(s) named in, and who executed the foregoing application, being duly sworn according to law, deposes and says that the statements and representations set forth in the above application are true and correct to the best of his/her knowledge and belief.



[Signature]
Notary Public

seal

Appendix I

<u>Reseller Name</u>	<u>Address</u>	<u>Contact Person</u>	<u>Phone Number</u>
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Startec does not provide operator services.

LIST OF EXHIBITS

Exhibit A	Management Biographies (<i>Response to Part I, Item C</i>)
Exhibit B	Authorizations Revoked (<i>Response to Part I, Item D</i>)
Exhibit C	Information Regarding State Operations and Complaints (<i>Response to Part II, Item C</i>)
Exhibit D	Startec Bill Sample (<i>Response to Part II, Item M</i>)
Exhibit E	Certificate of Incorporation (<i>Response to Part III, Item A(a)</i>)
Exhibit F	Delaware Certificate of Good Standing(<i>Response to Part III, Item A(b)</i>)
Exhibit G	Tennessee Certificate of Authority (<i>Response to Part III, Item A(b)(1)</i>)
Exhibit H	Corporate Structure Chart (<i>Response to Part III, Item A(d)</i>)
Exhibit I	History of Material Litigation and Criminal Convictions (<i>Response to Part III, Item A(e) & Part IV, Item D</i>)
Exhibit J	Financial Statements (<i>Response to Part IV, Item B</i>) <i>[CONFIDENTIAL - Provided Under Seal]</i>
Exhibit K	Startec Global Operating Company Tariff (<i>Appendix II</i>)
Exhibit L	Small and Minority Owned Telecommunications Business Participation Plan (<i>Response to Part IV, Item A</i>)
Exhibit M	Surety Bond Rider

EXHIBIT A

Management Biographies

(Response to Part I, Item C)

Startec Management Biographies

The directors and officers of Startec Global Operating Company ("Startec") are:

Howard Kamerer	Director, President and Chief Executive Officer
An Phung	Director, Treasurer, Chief Financial Officer and Executive Vice President
Robert Felgar	Director, Secretary and General Counsel
T.J. Master	Senior Vice President, Sales & Marketing
Akbar Merchant	Senior Vice President of Global Marketing
Rekha Nambiar	Vice President of Global Buying
Steve Villeneuve	Vice President of Network Operations

These officers and directors can be reached through Startec's principal place of business. Biographies of these officers and directors are provided below.

Howard Kamerer

President and Chief Executive Officer

Mr. Kamerer joined Startec in May 2005. His mission is to expand Startec's traditional International Long Distance service toward a variety of innovative access offerings, such as Voice over Broadband. Mr. Kamerer has 16 years of experience in the communications industry and was an early pioneer in the field of IP convergence.

Mr. Kamerer served as President and COO of Allied Telesyn where he led the development of the industry's first IP based Multi-Access Platform. Mr. Kamerer founded and served as CEO of the Redeye Network Group, which was purchased by Allied Telesyn. Mr. Kamerer has also held positions at Cisco Systems in channel operations, network service provider operations, and the enhanced service migration business unit.

Mr. Kamerer has a Bachelor's and a Master's degree in Communications from Eastern Illinois University.

An Phung

Chief Financial Officer

Ms. Phung joined Startec in August 2005 and is responsible for overseeing the Finance & Accounting, Legal and Human Resources departments. Ms. Phung has 13 years of experience in the real estate, hospitality and communications industries.

Ms. Phung spent eight years at Interstate Hotels & Resorts in various finance and accounting management positions that included the SEC reporting, treasury and accounting functions. She was extensively involved in over a dozen public equity and debt issuances. She also managed finance and accounting for Interstate's corporate housing division. Prior to that, Ms. Phung worked as a supervising senior accountant for KPMG where she provided accounting and consulting services to both public and private companies.

Ms. Phung has BBA in Accounting from the College of William and Mary and is a Certified Public Accountant.

T.J. Master

Senior Vice President, Sales & Marketing

Mr. Master joined Startec in 1992 and is responsible for managing Startec's sales & marketing, product development, branding and marketing communications. Mr. Master is also integral to the Company's merger and acquisition activities. Mr. Master has 16 years of marketing experience in the media and communications industries.

Mr. Master was responsible for product management of dial around services at Teleglobe International, one of the world's leading wholesale providers of international telecommunications services. Prior to that Mr. Master marketed various print publications for Bennett Coleman and Company Limited, India's largest media group.

Mr. Master has an MBA in International Marketing and Finance from the American University, Washington, D.C. and a Bachelor's degree in Science from the University of Delhi, India.

Akbar Merchant

Senior Vice President, Business Development

Akbar Merchant has more than nine years of experience in telecommunications. Since joining Startec in 1996, he has held key positions in operations and engineering and in managing wholesale and retail business divisions. His initial role at Startec was managing the back-office of carrier services. Subsequently, he managed the implementation of the Global Network Management Center. He has held the position of Managing Director for USA in which capacity he was overseeing the U.S. consumer division, the call shop division, network operations, and customer service. More recently, he has been responsible for mergers and acquisitions and for the creation and delivery of new services. He played a leading role in acquiring and integrating PT-1. He is currently responsible for developing new and improved performance dashboards for the company and facilitating interdepartmental efforts to improve Startec's business. Prior to joining Startec, he worked as an engineering consultant with Apex Environmental of Rockville, Maryland.

Mr. Merchant received a Bachelor's degree from the Massachusetts Institute of Technology (MIT) in 1989 and a Master's degree from Northwestern University in 1992.

Robert Sprouse

Vice President, Information Systems and Technologies

Mr. Sprouse joined Startec in 2005 as Vice President of Information Systems and Technologies. In this role he is responsible for managing both the IS and IT operations for Startec. Mr. Sprouse

brings 16 years of experience as a system engineer, integrator, technician, supervisor, manager, and trainer. His responsibilities have included designing, planning, installing, maintaining, operating, and training personnel on a range of communications equipment and software applications.

Prior to joining Startec, Mr. Sprouse served as the Senior Network Engineer for Vernon Telephone Cooperative and Midwest TelNet, a state-wide provider of IPVideo. From 2001 through 2004, he served as the Director of System Engineering and R&D for the Network Service Provider Division of Allied Telesyn Inc. He served as Mid-Atlantic Systems Engineer and FirewallSecurity Subject Matter Expert for Allied Riser Communication during 2000 and 2001. Mr. Sprouse's efforts were essential in the early research and development of IPTV and the Triple Play.

Stephen Villeneuve
Vice President, Network Operations and Engineering

Mr. Villeneuve joined Startec in 2000 and is responsible for managing Network Field Operations, Engineering, Provisioning and Translations, Least Cost Routing and the Network Management Center. Mr. Villeneuve is an 18-year veteran of telecommunication technologies. Mr. Villeneuve managed Startec's first VoIP deployment to terminate international long distance traffic.

Prior to joining Startec, he served as a network operations supervisor and manager at Cable and Wireless from 1993 to 2000.

Mr. Villeneuve graduated from Control Data Institute Technical School in 1988.

Robert Felgar

Robert Felgar joined Startec in May 2005 and is currently General Counsel. In this role he is responsible for all of Startec's legal affairs.

Mr. Felgar has over nine years of experience as an attorney in the telecommunications industry. Prior to joining Startec he worked as an attorney at private law firms representing both incumbent and competitive carriers before the Federal Communications Commission ("FCC") and the state public utility commissions. He represented radio and television companies in various transactions, as well as before the FCC. He also handled various litigation matters, including antitrust cases. Immediately prior to joining Startec, Mr. Felgar was an attorney at Dickstein Shapiro, where he practiced for five years.

Mr. Felgar received a Bachelor's degree from McGill University in 1992, a Master's degree from Queen's University in 1994 and Juris Doctor degree from the George Washington University Law School in 1997.

EXHIBIT B

Authorizations Revoked

(Response to Part I, Item D)

Authorizations Revoked

Startec Global Operating Company has not been denied a Certificate to provide telecommunications services from a state public utility commission or had any such certification revoked or suspended in any jurisdiction. Startec Global Operating Company has had its authority to transact business suspended or temporarily revoked, including in Tennessee, but subsequently had such authority reinstated.

EXHIBIT C

Information Regarding State Operations and Complaints

(Response to Part II, Item C)

Information Regarding State Operations and Complaints

Startec is authorized to provide interstate and international long distance service by the FCC and intrastate long distance services in every state except Alaska. Startec currently provides long distance, Internet, and/or other communications services in the following states: Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, District of Columbia, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Texas, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin, and Wyoming.

Startec provides its services primarily to customers who place a significant number of calls to international destinations.

A summary of complaints filed against Startec in 2007 follows:

Regulatory Agency	Date received	Date responded	Case ID	Resolved	Type
CPUC		4/3/2007		Y	Slamming
CPUC		4/3/2007		Y	Unrec Usage
FLA PSC	3/15/2007	4/3/2007	729321T	Y	Slamming
FCC	3/28/2007	4/3/2007	IC 07-10268408	Y	Fee Dispute
FCC	3/7/2007	4/5/2007	IC 07-10264068	Y	Fee Dispute
NYS PSC	4/6/2007	4/9/2007	630366	Y	Fee Dispute
NYS PSC	4/11/2007	4/11/2007	709221	Rebuttal	Slamming
FCC	3/26/2007	4/13/2007	IC 07-10267236	Y	Unrec Usage
IL Attorney General		4/24/2007		Y	Slamming
WA Attorney General		4/24/2007	261988	Y	Fee Dispute
NYS PSC	4/25/2007	4/27/2007	709221	Rebuttal	Slamming
NJ Gloucester County		4/28/2007		Y	Fee Dispute
				Followed Up	
CPUC	4/30/2007	4/30/2007	6-4-8914		Slamming
FCC	4/27/2007		IC 07-10272271		Rate Dispute
FCC	4/10/2007		IC 07-IW12824159		Rate Dispute
FCC	4/4/2007		IC 07-W12706798		Unrec Usage
FCC	4/16/2007		IC 07-R253833		Rate Dispute
FCC	4/16/2007		IC 07-W12824714		Rate Dispute
CPUC	4/16/2007		07-02-4268		Fee Dispute
FLA PSC	4/16/2007		732372T		Fee Dispute

EXHIBIT D

Startec Bill Sample

(Response to Part II, Item M)



477 Peace Portal Dr, #107
Blaine, WA 98230-4023
(* Do not use the above
address for sending
payment)

Return Service Requested

Page 1 of 6

INVOICE NO: [REDACTED] ACCOUNT NO: [REDACTED] INVOICE DATE:
April 11, 2007

TOTAL AMOUNT DUE: \$154.72

Usage Summary

Outbound Domestic	33.01
Outbound International	33.11
Total Usage	\$66.12

Total Usage	66.12
Total Tax	1.45
Total Fees	7.87
Debits	0.00

Late Fees	1.17
-----------	------

Total Current Charges	\$76.61
Previous Balance	\$78.11

Payment Received	-0.00
Discounts	-0.00
Credits	-0.00

Total Amount Due	\$154.72
------------------	----------

Payments must be received by the due date. If previous balance has been paid, please pay current charges only. Returned checks incur a \$25 fee. A late fee of 1.5% is charged on overdue balances.
Questions? Call Customer Service at 1-800-342-0485, Mon-Fri 9:00AM-11:59PM (EST) or email customer@startec.com

Payment Due Date Upon Receipt



PLEASE RETURN THIS PORTION WITH YOUR PAYMENT

INVOICE NO: [REDACTED] ACCOUNT NO: [REDACTED] PAYMENT DUE DATE: Upon Receipt AMOUNT DUE: \$154.72

AMOUNT PAID:

Mail Payment(s) to:

Startec Global Communications
PO BOX 105043
Atlanta, GA 30348-5043

0000022594720004 000007661 000015472 0091250673

Thank you for choosing Startec!

How to pay your bill:

- By Mail:** Please detach below portion and return with your payment in the enclosed envelope. Make check payable to **Startec Global Communications**. Please write your account number on your check or money order. Do not send cash. If mailing a payment without the enclosed envelope, remit to:
Startec, PO Box 105043, Atlanta GA 30348-5043
- By Phone:** You can make your payment by Credit Card over the phone by calling Startec Customer Service at 1-800-342-0485. Startec accepts VISA and Mastercard.
- Online:** You can pay your bill online at www.myaccount.startec.com. Login using your 10-digit phone number and password. If you do not yet have a Startec MyAccount password, you can use your account number as shown on this bill.
- You can also choose to sign up for **online billing**, and have charges conveniently paid by credit card each month. Get details online or by calling Startec Customer Service.

When to pay your bill:

Payment is due upon receipt of your invoice. To avoid a late payment charge, payment must be received by the Payment Due Date printed on your bill. A late payment charge of 1.5% will be applied to the total unpaid balance that remains after the Payment Due Date.

Questions about your bill:

For information about a transaction on your bill, please call Startec Customer Service at the number printed on the front of the bill. All requests for investigation must be received within 45 days of the date of the bill on which the problem occurs.

Returned items:

A fee of \$25.00 will be applied to returned checks.

Yes, please sign me up for online billing. I authorize you to charge the card below on my due date for future invoices on my account.

CC #:

Expiration Date: ____/____

Print Name: _____

Signature: X _____

Email*: _____@_____

CHANGE OF ADDRESS

Account Name: _____

New Address: _____

City: _____ State: _____

Zip Code: _____

* Online invoices will be available for review at www.myaccount.startec.com Notice will be provided to this email address.

ACCOUNT NAME:
[REDACTED]
ACCOUNT NO: [REDACTED] INVOICE NO: [REDACTED] INVOICE DATE:
April 11, 2007

Payment Reminder

Dear Sir/Madam:

We missed your payment of \$ 78.11 on your due date.
Please send payment today in the amount of \$154.72
to bring your account up to date. We accept payments by check
and credit card.

If you have any questions regarding your past due balance,
Please contact our Accounts Receivable department during our
normal business hours (9:00 a.m. - 5:00 p.m. Pacific Time)

If you have already made a payment or payment arrangement,
please ignore this notice and accept our thanks.

Yours sincerely,
Accounts Receivable Department (800) 206-5977

Fees

Regulatory Assessment Fee for [REDACTED] (03/11/2007 to 04/10/2007)

7.87

Total Fees \$7.87**Taxes**

Federal Tax 0.00

Local Tax 0.00

State Tax 1.45

Total Taxes \$1.45

<u>Date</u>	<u>Time</u>	<u>Called Number</u>	<u>Called Location</u>	<u>Minutes</u>	<u>Amount</u> <u>(US \$)</u>
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Telephone Charges

Calls from [REDACTED]

Domestic Calls From [REDACTED]

InterState

1	03/11	04:05 PM	[REDACTED]	VALLEY CITY	OH	4.00	0.20
2	03/11	04:10 PM	[REDACTED]	WILLOUGHBY	OH	2.00	0.10
3	03/11	05:42 PM	[REDACTED]	WILLOUGHBY	OH	13.00	0.64
4	03/11	07:35 PM	[REDACTED]	CHICAGO ZONE 2	IL	6.00	0.30
5	03/12	06:22 PM	[REDACTED]	CHICAGO ZONE 2	IL	1.00	0.05
6	03/12	06:23 PM	[REDACTED]	CHICAGO ZONE 10	IL	1.00	0.05
7	03/13	06:41 PM	[REDACTED]	CHICAGO ZONE 10	IL	1.00	0.05
8	03/13	06:41 PM	[REDACTED]	CHICAGO ZONE 2	IL	38.00	1.87
9	03/14	06:22 PM	[REDACTED]	CHICAGO ZONE 2	IL	1.00	0.05
10	03/14	07:04 PM	[REDACTED]	CHICAGO ZONE 2	IL	33.00	1.62
11	03/15	06:21 PM	[REDACTED]	CHICAGO ZONE 2	IL	38.00	1.87
12	03/16	06:05 PM	[REDACTED]	CHICAGO ZONE 2	IL	1.00	0.05
13	03/17	09:54 AM	[REDACTED]	CHICAGO ZONE 2	IL	27.00	1.33
14	03/18	10:31 AM	[REDACTED]	ST LOUIS	MO	12.00	0.59
15	03/18	10:42 AM	[REDACTED]	CHICAGO ZONE 2	IL	40.00	1.96
16	03/19	07:26 PM	[REDACTED]	CHICAGO ZONE 2	IL	28.00	1.38
17	03/20	06:59 PM	[REDACTED]	CHICAGO ZONE 2	IL	55.00	2.70
18	03/21	06:37 PM	[REDACTED]	CHICAGO ZONE 1	IL	1.00	0.05
19	03/22	11:11 AM	[REDACTED]	CHICAGO ZONE 10	IL	3.00	0.15
20	03/22	05:26 PM	[REDACTED]	CHICAGO ZONE 1	IL	31.00	1.52
21	03/23	06:31 PM	[REDACTED]	CHICAGO ZONE 2	IL	65.00	3.19
22	03/25	02:14 PM	[REDACTED]	CHICAGO ZONE 2	IL	28.00	1.38
23	03/26	05:53 PM	[REDACTED]	CHICAGO ZONE 2	IL	1.00	0.05
24	03/26	05:55 PM	[REDACTED]	CHICAGO ZONE 10	IL	1.00	0.05
25	03/26	05:56 PM	[REDACTED]	CHICAGO ZONE 1	IL	34.00	1.67
26	03/26	07:12 PM	[REDACTED]	CHICAGO ZONE 2	IL	20.00	0.98
27	03/27	03:46 PM	[REDACTED]	MEDINA	OH	13.00	0.64
28	03/27	03:59 PM	[REDACTED]	OLMSTED FALLS	OH	8.00	0.40
29	03/27	04:06 PM	[REDACTED]	SANDUSKY	OH	4.00	0.20
30	03/27	08:42 PM	[REDACTED]	CHICAGO ZONE 2	IL	1.00	0.05
31	03/28	06:57 PM	[REDACTED]	CHICAGO ZONE 2	IL	2.00	0.10
32	03/28	07:02 PM	[REDACTED]	CHICAGO ZONE 1	IL	3.00	0.15
33	03/28	07:04 PM	[REDACTED]	CHICAGO ZONE 1	IL	46.00	2.26
34	03/29	07:28 PM	[REDACTED]	CHICAGO ZONE 2	IL	34.00	1.67
35	03/31	10:12 AM	[REDACTED]	CHICAGO ZONE 2	IL	1.00	0.05
36	03/31	10:13 AM	[REDACTED]	CHICAGO ZONE 1	IL	12.00	0.59
37	03/31	05:54 PM	[REDACTED]	CHICAGO ZONE 2	IL	1.00	0.05
38	04/01	09:02 AM	[REDACTED]	CHICAGO ZONE 1	IL	6.00	0.30
39	04/01	04:57 PM	[REDACTED]	CHICAGO ZONE 2	IL	40.00	1.96

ACCOUNT NAME:

ACCOUNT NO:

INVOICE NO:

INVOICE DATE:
April 11, 2007

Invoice Details

	<u>Date</u>	<u>Time</u>	<u>Called Number</u>	<u>Called Location</u>		<u>Minutes</u>	<u>Amount</u> (US \$)
Calls from [REDACTED]							
Domestic Calls From [REDACTED]							
InterState							
40	04/03	07:05 PM	[REDACTED]	CHICAGO ZONE 2	IL	13.00	0.64
41	04/05	09:25 AM	[REDACTED]	EUGENE	OR	1.00	0.05
42	04/08	09:20 AM	[REDACTED]	CHICAGO ZONE 2	IL	1.00	0.05
Total Domestic Calls From [REDACTED]						42 Calls 671.00 Mins \$33.01	
International Calls From 3015710194							
43	03/17	07:13 AM	[REDACTED]	Cellular	U.A.E.	1.00	0.45
44	03/17	07:47 AM	[REDACTED]	Cellular	India	1.00	0.18
45	03/18	08:59 AM	[REDACTED]	Delhi	India	75.00	13.43
46	03/18	10:15 AM	[REDACTED]	Cellular	U.A.E.	8.00	3.60
47	03/18	10:22 AM	[REDACTED]	Cellular	U.A.E.	8.00	3.60
48	03/21	06:57 AM	[REDACTED]		India	26.00	4.66
49	03/22	12:02 PM	[REDACTED]	Cellular	U.A.E.	5.00	2.25
50	03/24	08:51 AM	[REDACTED]	Cellular	U.A.E.	11.00	4.94
Total International Calls From [REDACTED]						8 Calls 135.00 Mins \$33.11	
Total From [REDACTED]						50 Calls 806.00 Mins \$66.12	

EXHIBIT E

Certification of Incorporation

(Response to Part III, Item A(a))

CERTIFICATE OF INCORPORATION
OF
STGC OPERATING COMPANY

1. Name. The name of the Corporation is STGC Operating Company.
2. Registered Office and Agent. The address of the Corporation's registered office in the State of Delaware is 1013 Centre Road, in the City of Wilmington, County of New Castle, 19805. The Registered Agent in charge thereof is Corporation Service Company.
3. Purpose. The purposes for which the Corporation is formed are to engage in any lawful act or activity for which corporations may be organized under the General Corporation Law of Delaware and to possess and exercise all of the powers and privileges granted by such law and any other law of Delaware.
4. Authorized Capital. The aggregate number of shares of stock which the Corporation shall have authority to issue is one hundred (100) shares, all of which are of one class and are designated as Common Stock and each of which has a par value of one cent (\$.01) per share.
5. Incorporator. The name and mailing address of the incorporator are:

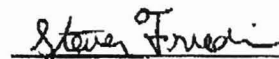
Steven Friedman
Schnader Harrison Segal & Lewis LLP
Suite 600
1225 Eye Street, N.W.
Washington, DC 20005
6. Bylaws. In furtherance and not in limitation of the powers conferred by the laws of the State of Delaware, the Board of Directors of the corporation is expressly authorized to make, alter and repeal the bylaws of the corporation, subject to the powers of the stockholders of the corporation to alter or repeal any bylaw whether adopted by them or otherwise.
7. Election of Directors. Elections of directors need not be by written ballot unless the bylaws of the Corporation shall so provide.
8. Right to Amend. The Corporation reserves the right to amend any provision contained in this Certificate as the same may from time to time be in effect in the manner now or hereafter prescribed by law, and all rights conferred on stockholders or others hereunder are subject to such reservation.

9. Limitation on Liability. The directors of the Corporation shall be entitled to the benefits of all limitations on the liability of directors generally that are now or hereafter become available under the General Corporation Law of Delaware. Without limiting the generality of the foregoing, no director of the Corporation shall be liable to the Corporation or its stockholders for monetary damages for breach of fiduciary duty as a director, except for liability (i) for any breach of the director's duty of loyalty to the Corporation or its stockholders, (ii) for acts or omissions not in good faith or which involve intentional misconduct or a knowing violation of law, (iii) under Section 174 of the Delaware General Corporation Law, or (iv) for any transaction from which the director derived an improper personal benefit. Any repeal or modification of this Section 9 shall be prospective only, and shall not affect, to the detriment of any director, any limitation on the personal liability of a director of the Corporation existing at the time of such repeal or modification.

It is the intention that the objects, purposes and powers specified in the third paragraph hereof shall not be limited or restricted by reference to or inference from the terms of any other clause or paragraph in this Certificate of Incorporation, but that the objects, purposes and powers specified in the third paragraph and in each of the clauses or paragraphs of this Certificate of Incorporation shall be regarded as independent objects, purposes and powers.

10. Initial Directors. The powers of the incorporator are to terminate upon the filing of this Certificate of Incorporation. The name and mailing address of the person who is to serve as the initial director of the corporation until the first annual meeting of stockholders of the corporation, or until his successor is elected and qualified, is: Ram Mukunda at 10411 Motor City Drive, Bethesda, Maryland 20817.

IN WITNESS WHEREOF, the undersigned has executed this document on the 16th day of April, 1998.



Steven Friedman, Incorporator

CERTIFICATE OF AMENDMENT
OF
CERTIFICATE OF INCORPORATION
OF
STGC OPERATING COMPANY

STGC Operating Company, a corporation organized and existing under the General Corporation Law of the State of Delaware (the "Corporation"), does hereby certify:

FIRST: The Corporation has not received any payment for any of its stock.

SECOND: The amendment to the Corporation's Certificate of Incorporation set forth in the following resolution was approved by the sole member of the Corporation's Board of Directors and was duly adopted in accordance with the provisions of Section 241 of the General Corporation Law of the State of Delaware:

"RESOLVED, that the Certificate of Incorporation of the Corporation is amended by striking Article FIRST in its entirety and replacing therefor: 'FIRST: The name of the Corporation is Startec Global Operating Company.'"

IN WITNESS WHEREOF, STGC Operating Company has caused this Certificate to be signed and attested by its duly authorized officer, this 24th day of April, 1998.

STGC Operating Company

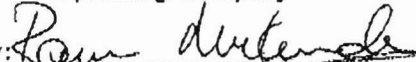
By: 
Ram Mukunda, President

EXHIBIT F

Delaware Certificate of Good Standing

(Response to Part III, Item A(b))

Delaware

PAGE 1

The First State

I, HARRIET SMITH WINDSOR, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "STARTEC GLOBAL OPERATING COMPANY" IS DULY INCORPORATED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL CORPORATE EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE TWENTY-SEVENTH DAY OF FEBRUARY, A.D. 2007.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "STARTEC GLOBAL OPERATING COMPANY" WAS INCORPORATED ON THE TWENTY-FIRST DAY OF APRIL, A.D. 1998.

AND I DO HEREBY FURTHER CERTIFY THAT THE FRANCHISE TAXES HAVE BEEN PAID TO DATE.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL REPORTS HAVE BEEN FILED TO DATE.



2886470 8300

070242127

Harriet Smith Windsor

Harriet Smith Windsor, Secretary of State

AUTHENTICATION: 5465736

DATE: 02-27-07

EXHIBIT G

Tennessee Certificate of Authority

(Response to Part III, Item A(b)(1))

Secretary of State
Division of Business Services
312 Eighth Avenue North
6th Floor, William R. Snodgrass Tower
Nashville, Tennessee 37243

DATE: 09/06/06
REQUEST NUMBER: 5856-1885
TELEPHONE CONTACT: (615) 741-2286
FILE DATE/TIME: 09/06/06 1050
EFFECTIVE DATE/TIME: 09/06/06 1050
CONTROL NUMBER: 0354280

TO:
TECHNOLOGIES MANAGEMENT INC
P.O. DRAWER 200

WINTER PARK, FL 32790-0200

RE:
STARTEC GLOBAL OPERATING COMPANY
APPLICATION FOR REINSTATEMENT

IT HAS BEEN DETERMINED THAT THE ATTACHED APPLICATION FOR REINSTATEMENT CONTAINS THE INFORMATION REQUIRED BY STATUTE; THEREFORE THE ABOVE CORPORATION IS HEARBY REINSTATED, OR IF A FOREIGN CORPORATION, ITS CERTIFICATE OF AUTHORITY IS REINSTATED.

WHEN CORRESPONDING WITH THIS OFFICE OR SUBMITTING DOCUMENTS FOR FILING, PLEASE REFER TO THE CORPORATION CONTROL NUMBER GIVEN ABOVE.

FOR: APPLICATION FOR REINSTATEMENT

ON DATE: 09/06/06

FROM:
TECHNOLOGIES MANAGEMENT INC
P.O. BOX 200

WINTER PARK, FL 32790-0000

RECEIVED:	FEES \$70.00	\$0.00
TOTAL PAYMENT RECEIVED:		\$70.00

RECEIPT NUMBER: 00004022806
ACCOUNT NUMBER: 00308944



RECEIVED SEP 11 2006

Riley C. Darnell

RILEY C. DARNELL
SECRETARY OF STATE

State of Tennessee



Department of State
Corporate Filings
312 Eighth Avenue North
6th Floor, William R. Snodgrass Tower
Nashville, TN 37243

APPLICATION FOR REINSTATEMENT
FOLLOWING ADMINISTRATIVE
DISSOLUTION/REVOCATION

FILED
For Office
2006 SEP - 6 AM 10:50
OFFICE OF THE SECRETARY OF STATE

5855.1885

Pursuant to the provisions of Section 48-24-203 or Section 48-25-303 of the Tennessee Business Corporation Act or Section 48-64-203 or Section 48-65-303 of the Tennessee Nonprofit Corporation Act, this application is submitted to the Office of the Secretary of State, State of Tennessee, for reinstatement.

1. The name of the corporation is Startec Global Operating Company

(Name change if applicable) _____

2. The effective date of its administrative dissolution/revocation is 4/19/02 (must be month, day, and year).

3. The ground(s) for the administrative dissolution/revocation

☐ did not exist.

☒ has/have been eliminated.

[NOTE: Please mark the applicable box.]

4. The corporate name as listed in number one (1) satisfies the requirements of Tennessee Code Annotated Section 48-14-101 or 48-54-101, as appropriate.

5. The corporation control number as assigned by the Secretary of State, if known is 0354280

[NOTE (APPLIES TO FOR-PROFIT CORPORATIONS ONLY): Prior to this document being accepted for filing, the Division of Business Services will request tax clearance verification from the Tennessee Department of Revenue that the business has properly filed all reports and paid all required taxes and penalties. If we cannot obtain such tax clearance verification from the Department of Revenue, this document will be rejected and returned to the applicant.]

August 28, 2006

Signature Date

Secretary

Signer's Capacity

Startec Global Operating Company

Name of Corporation

Robert Felgar

Signature

Robert Felgar

Name (typed or printed)

2006-08-15
N0004901

20:43

R 3/2
4879538060815



TENNESSEE DEPARTMENT OF REVENUE

STARTEC GLOBAL OPERATING COMPANY
ATTN: ATLANTAX SYSTEMS INC
21516 HAWTHORNE BLVD STE 360
TORRANCE CA 90503-5708

|||||

August 15, 2006

Account Type: FRAN/EXCS2

Account No.: 317409695

5056.1086

We have received and processed your request for tax clearance for the account indicated above. Your certificate of tax clearance is attached below. The certificate, along with the appropriate reports, forms, and fees required, must be submitted to the following address:

Secretary of State
312 8th Ave. N
6th floor
William R. Snodgrass Tower
Nashville, TN 37243

Certificates of clearance for Certificate of Existence/Authorization or Reinstatement of Corporate Charter/Certificate of Authority are invalid after 45 days past the effective date. For additional information regarding this account, you may call Taxpayer Services between 8:00 a.m. and 4:30 p.m. (CST) Monday through Friday, holidays excepted. Please see the back of this notice for our local offices and phone numbers.

DETACH HERE AND SUBMIT TO THE TENNESSEE SECRETARY OF STATE

TENNESSEE DEPARTMENT OF REVENUE

500 DEARBORN STREET
ANDREW JACKSON STATE OFFICE BUILDING
NASHVILLE, TN 37243

CERTIFICATE OF TAX CLEARANCE

August 15, 2006

STARTEC GLOBAL OPERATING COMPANY
1151 SEVEN LOCKS RD
POTOMAC, MD 20854-2905

Notice No.: 4879538060815
Account No.: 317409695
Sec. of State Control No.: 0354280
Effective Date: August 15, 2006

Tax Clearance has been granted for:

LETTER OF GOOD STANDING

This is to certify that all applicable reports have been filed and that fees, penalties and taxes have been paid as required by revenue laws of this state.

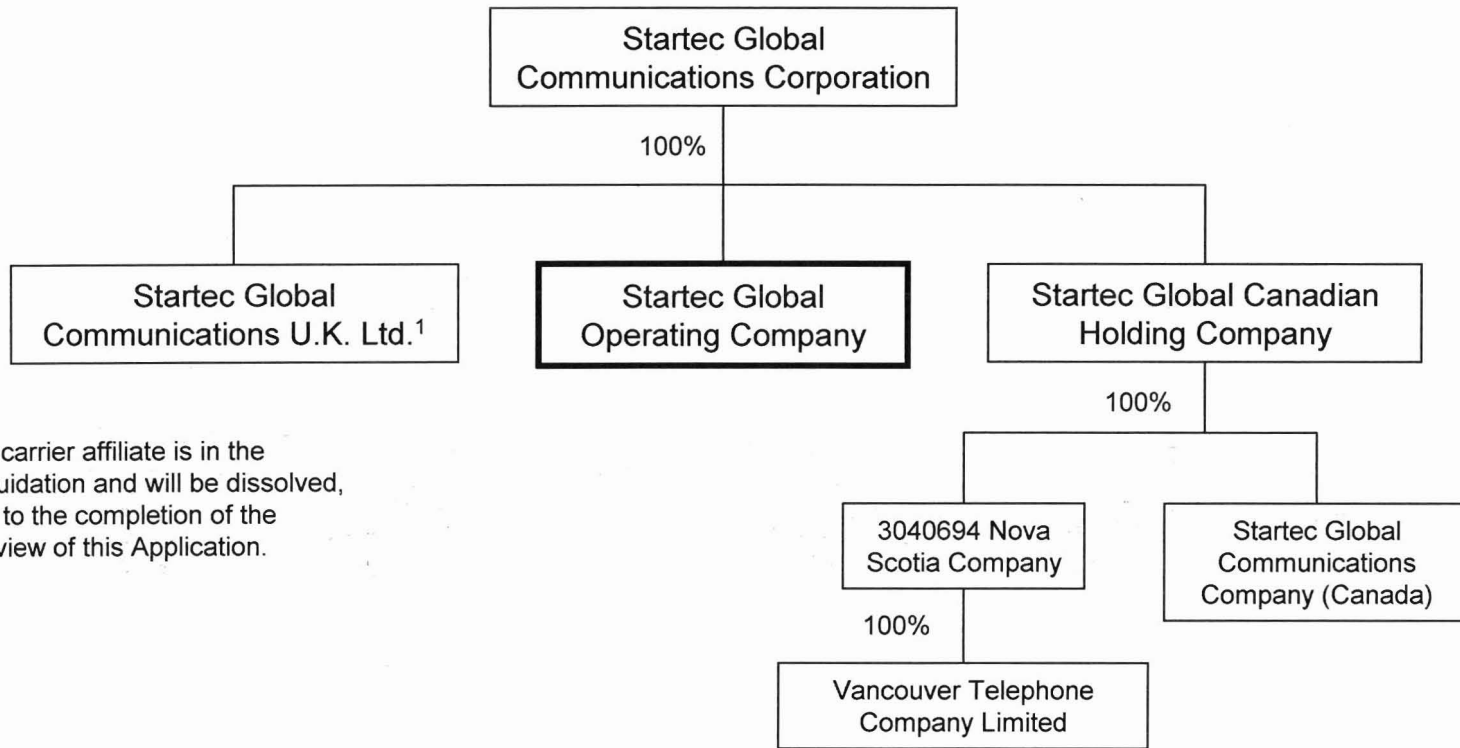
Loren L. Chumley
COMMISSIONER OF REVENUE

EXHIBIT H

Corporate Structure Chart

(Response to Part III, Item A(d))

Corporate Structure of Startec



¹ This foreign carrier affiliate is in the process of liquidation and will be dissolved, possibly prior to the completion of the Authority's review of this Application.

EXHIBIT I

History of Material Litigation and Criminal Convictions

(Response to Part III, Item A(e) & Part IV, Item D)

History of Material Litigation and Criminal Convictions

None of the directors, executive officer, or key shareholders of Startec Global Operating Company have any criminal convictions for the ten-year period prior to the date of this application.

Neither Startec Global Operating Company, its directors, executive officer, nor key shareholders have any current material litigation (defined as any litigation that, according to generally accepted accounting principles, is deemed significant to a person's financial health and would be required to be referenced in annual audited financial statements, reports to shareholders or similar documents). Nor was any material litigation reported in the 2005 Consolidated Financial Statements of Startec Global Operating Company's parent, which were provided as Exhibit J. Material litigation that Startec Global Operating Company has identified is described below:

On December 14, 2001, Startec Global Communications Company, Startec Global Licensing Company and Startec Global Operating Company (collectively, the "Debtors"), filed a voluntary petition for relief under chapter 11 of title 11 of the United State Code in the United States Bankruptcy Court for the District of Maryland (Greenbelt Division). On April 6, 2004, the Bankruptcy Court entered an Order confirming to which the Debtors exited bankruptcy.

EXHIBIT J

Financial Statements

(Response to Part IV, Item B)

[CONFIDENTIAL - Provided Under Seal]

Applicant request confidential treatment of Exhibit J - Financial Statements. The Financial Statements contain commercially sensitive and competitively significant information that is not otherwise released to the public. Unrestricted availability of this information would provide competitors with knowledge that would be otherwise unavailable and could place Applicant at a competitive disadvantage. Confidential and trade secret treatment is therefore required to avoid commercial and competitive injury.

EXHIBIT K

Startec Global Operating Company Tariff

(Response to Appendix II)

DESCRIPTION OF SERVICES AND RATES

1.1 General

Startec Global Operating Company offers direct dial long distance service to its customers. Rates for these services vary by product. All Startec services are available 24 hours a day, seven days a week.

Issued: May 2, 2007

Issued by: Mr. Robert Felgar - General Counsel and Secretary
7361 Calhoun Place, Suite 650
Rockville, Maryland 20855

DESCRIPTION OF SERVICES AND RATES, (CONT'D.)

1.2 Timing of Calls

The Company does not offer time sensitive calls.

1.3 Rate Periods

The Company does not rate calls based on time of day.

1.4 Calculation of Distance

The Company does not rate calls based on mileage.

1.5 Holidays

The Company does not offer rate discounts for calls placed on state or federal holidays.

Issued: May 2, 2007

Issued by: Mr. Robert Felgar - General Counsel and Secretary
7361 Calhoun Place, Suite 650
Rockville, Maryland 20855

DESCRIPTION OF SERVICES AND RATES, (CONT'D.)**1.6 STARTEC Direct Dial**

Startec Direct Dial is a direct dial outbound calling plan designed for residential customers. Calls are placed over switched access facilities. This service is only offered as an addition to Startec Direct Dial interstate service. All calls are billed in one (1) minute increments after an initial period, for billing purposes, of one (1) minute. All calls are billed in arrears.

1.6.1 Rates and Charges

Per Minute Rate	\$0.069
Calling Card:	
Calling Card Per Minute Rate	\$0.069
Per Call Surcharge	N/A
Pay Telephone Surcharge	\$0.50

Issued: May 2, 2007

Issued by: Mr. Robert Felgar - General Counsel and Secretary
7361 Calhoun Place, Suite 650
Rockville, Maryland 20855

DESCRIPTION OF SERVICES AND RATES, (CONT'D.)**1.7 STARTEC Casual Calling Service**

Startec Casual Calling Service is a non-presubscribed outbound only service available to residential and business customers. All calls are originated by dialing the Company's "101-6868" code, then the area code, if necessary, and the terminating telephone number. All calls are billed in one (1) minute increments after an initial period, for billing purposes, of one (1) minute. This service is available between locations within Tennessee. The rates shown do not apply to calls to Directory Assistance. Such service is available twenty-four (24) hours a day, seven (7) days a week. This service is only offered as an addition to Startec Casual Calling Service.

1.7.1 Rates and Charges

Per Minute Rate	\$0.079
-----------------	---------

Issued: May 2, 2007

Issued by:

Mr. Robert Felgar - General Counsel and Secretary
7361 Calhoun Place, Suite 650
Rockville, Maryland 20855

DESCRIPTION OF SERVICES AND RATES, (CONT'D.)**1.8 STARTEC Casual Calling II**

Startec Casual Calling II is a non-presubscribed outbound only service available to residential and business customers. All calls are originated by dialing the Company's "101-0719" code, then the area code, if necessary, and the terminating telephone number. This service is available between locations within Tennessee. The rates shown do not apply to calls to Directory Assistance. Such service is available twenty-four (24) hours a day, seven (7) days a week. This service is only offered as an addition to Startec Calling II interstate service. There is a Connection Fee associated with this service.

1.8.1 Rates and Charges

Per Minute Rate	\$0.069
Connection Fee	\$0.390

Issued: May 2, 2007

Issued by: Mr. Robert Felgar - General Counsel and Secretary
7361 Calhoun Place, Suite 650
Rockville, Maryland 20855

DESCRIPTION OF SERVICES AND RATES, (CONT'D.)**1.9 STARTEC TGS**

Startec TGS is a combined outbound direct dial, toll free inbound and calling card service designed for Business Customers billing. Calls are placed over switched and dedicated access facilities. Calls placed over switched access facilities are billed in six (6) second increments after an initial period, for billing purposes, of eighteen (18) seconds. Calls placed over dedicated access facilities are billed in six (6) second increments after an initial period, for billing purposes, of six (6) seconds. This service is only offered in conjunction with Startec TGS interstate service.

1.9.1 Rates and Charges

Direct Dial Outbound Service	
Switched Access Services (per minute)	\$0.0560
Dedicated Access Services (per minute)	\$0.0380
Toll-Free Inbound Service	
Switched Access Services (per minute)	\$0.0560
Dedicated Access Services (per minute)	\$0.0380
Toll-Free Monthly Recurring Charges	
Directory Listings (Up to 4 Numbers)	\$15.00
Monthly Account Maintenance Fee	\$2.50
Calling Card	
Per Minute Rate	\$0.1900
Per Call Surcharge	N/A
Pay Telephone Surcharge	\$0.50

Issued: May 2, 2007

Issued by:

Mr. Robert Felgar - General Counsel and Secretary
7361 Calhoun Place, Suite 650
Rockville, Maryland 20855

DESCRIPTION OF SERVICES AND RATES, (CONT'D.)**1.10 Directory Assistance**

Directory Assistance is available to Customers of Startec service. A Directory Assistance charge applies per intrastate Directory Assistance call made from points within the State of Tennessee. The Customer may make up to two (2) requests for a telephone number on each call to Directory Assistance. The Directory Assistance charge applies to each call regardless of whether the Directory Assistance Bureau is able to furnish the requested telephone number. Discounts are not applicable to Directory Assistance charges.

Directory Assistance, Per Call	\$1.99
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Issued: May 2, 2007

Issued by:

Mr. Robert Felgar - General Counsel and Secretary
7361 Calhoun Place, Suite 650
Rockville, Maryland 20855

MISCELLANEOUS SERVICES

2.1 Late Payment Charge

A late fee of 1.5% per month will be charged on any past due balance.

2.2 Return Check Charge

A return check charge of \$25.00 will be assessed for checks returned for insufficient funds. Any applicable return check charges will be assessed according to the terms and conditions of this Rate Sheet and pursuant to Tennessee law and Commission regulations.

Issued: May 2, 2007

Issued by: Mr. Robert Felgar - General Counsel and Secretary
7361 Calhoun Place, Suite 650
Rockville, Maryland 20855

EXHIBIT L

Small and Minority Owned Telecommunications Business Participation Plan

(Response to Part IV, Item A)

**SMALL AND MINORITY-OWNED
TELECOMMUNICATIONS BUSINESS PARTICIPATION PLAN OF
STARTEC GLOBAL OPERATING COMPANY**

I. DEFINITIONS

As defined in §65-5-112.

Minority-Owned Business. Minority-owned business shall mean a business which is solely owned, or at least fifty-one percent (51%) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls daily operations of such business, and who is impeded from normal entry into the economic mainstream because of race, religion, sex or national origin and such business has annual gross receipts of less than four million dollars (\$4,000,000).

Small Business. Small Business shall mean a business with annual gross receipts of less than four million dollars (\$4,000,000).

II. ADMINISTRATION

Startec Global Operating Company's ("Startec") Plan will be overseen and administered by the individual named below, hereinafter referred to as the Administrator, who will be responsible for carrying out and promoting Startec's full efforts to provide equal opportunities for small and minority-owned businesses. The Administrator of the Plan will be:

Robert Felgar
Startec Global Operating Company
7361 Calhoun Place, Suite 650
Rockville, MD 20855
Telephone: 301-610-4646
Facsimile: 240-314-4219

The Administrator's responsibilities will include:

- (1) Maintaining an updated Plan in full compliance with §65-5-112 and the rules and orders of the Tennessee Regulatory Authority.
- (2) Establishing and developing policies and procedures necessary for the successful implementation of the Plan.
- (3) Preparing and submitting such forms as may be required by the Tennessee Regulatory Authority, including the filing of required annual updates.
- (4) Serving as the primary liaison to and cooperate with the Tennessee Regulatory Authority, other agencies of the State of Tennessee, and small and minority-owned businesses to locate and use qualified small and minority-owned businesses as defined in §65-5-112.
- (5) Searching for and developing opportunities to use small and minority-owned businesses and encouraging such businesses to participate in and bid on contracts and subcontracts.
- (6) Providing records and reports and cooperate in any authorized surveys as required by the Tennessee Regulatory Authority.
- (7) Establishing a record-keeping system to track qualified small and minority-owned businesses and efforts to use such businesses.
- (8) Providing information and educational activities to persons within CLEC A and training such persons to seek out, encourage, and promote the use of small and minority-owned businesses.

In performance of these duties, the Administrator will utilize a number of resources, including:

Chambers of Commerce
The Tennessee Department of Economic and Community Development
The United States Department of Commerce
 Small Business Administration
 Office of Minority Business
The National Minority Supplier Development Counsel
The National Association of Women Business Owners
The National Association of Minority Contractors
Historically Black Colleges, Universities, and Minority Institutions

The efforts to promote and ensure equal opportunities for small and minority-owned businesses are primarily spelled out in the Administrator's duties above.

Additional efforts to provide opportunities to small and minority-owned businesses will include offering, where appropriate and feasible, small and minority-owned businesses assistance with technical, insurance, bonding, licensing, production, and deadline requirements.

III. RECORDS AND COMPLIANCE REPORTS

Startec will maintain records of qualified small and minority-owned business and efforts to use the goods and services of such businesses. In addition, Startec will maintain records of educational and training activities conducted or attended and of the internal procurement procedures adopted to support this plan.

Startec will submit records and reports required by the Tennessee Regulatory Authority concerning the Plan. Moreover, Startec will cooperate fully with any surveys and studies required by the Tennessee Regulatory Authority.

Dated: May 2, 2007.

Exhibit M

Surety Bond Rider



RIDER

Attached to and forming part of Bond # 42BSBDC1816

effective 09/01/2006

on behalf of STARTEC GLOBAL LICENSING COMPANY

of ATTN: JOHN SELVARAJ, 7361 CALHOUN PLACE, SUITE 650, ROCKVILLE, MD 20855

in favor of STATE OF TENNESSEE REGULATORY AUTHORITY

and in the amount of Twenty Thousand \$20,000

Dollars.

It is understood and agreed that effective September 1, 2006

the Principal's name

shall be changed

from STARTEC GLOBAL LICENSING COMPANY

to STARTEC GLOBAL OPERATING COMPANY

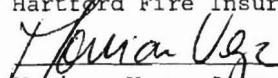
All other conditions and terms remain as originally written.

Signed, Sealed, and Dated

November, 28th, 2006

Hartford Fire Insurance Company

By:


Monica Vega, Attorney-in-Fact

The above endorsement is hereby agreed to and accepted:

By: _____

POWER OF ATTORNEY

Direct Inquiries/Claims to:

THE HARTFORD

BOND, T-4

P.O. BOX 2103, 690 ASYLUM AVENUE
HARTFORD, CONNECTICUT 06115

call: 888-266-3488 or fax: 860-757-5835)

Agency Code: 42 630317

KNOW ALL PERSONS BY THESE PRESENTS THAT:

- ☒ **Hartford Fire Insurance Company**, a corporation duly organized under the laws of the State of Connecticut
☐ **Hartford Casualty Insurance Company**, a corporation duly organized under the laws of the State of Indiana
☐ **Hartford Accident and Indemnity Company**, a corporation duly organized under the laws of the State of Connecticut
☐ **Hartford Underwriters Insurance Company**, a corporation duly organized under the laws of the State of Connecticut
☐ **Twin City Fire Insurance Company**, a corporation duly organized under the laws of the State of Indiana
☐ **Hartford Insurance Company of Illinois**, a corporation duly organized under the laws of the State of Illinois
☐ **Hartford Insurance Company of the Midwest**, a corporation duly organized under the laws of the State of Indiana
☐ **Hartford Insurance Company of the Southeast**, a corporation duly organized under the laws of the State of Florida

having their home office in Hartford, Connecticut (hereinafter collectively referred to as the "Companies") do hereby make, constitute and appoint, **up to the amount of UNLIMITED** :

BEVERLY K. BOHNERT, T. TRAJICK, VALERIE L. MCCORMICK, JOELLE L. LAPIERRE, LAURA WILLIAMS, TERUKO REINERTSEN, DEBORAH L. NELSON, MARY T. MONICA, DAN SHORT, VI. WHEELER, SUZAN TURNER, SUSAN J. NEWTON, GLORIA DIAZ, DEBBI SLOAN, MARGARET A. CAREY, STEPHEN KNOTT, DEANNA L. FULTON, SANDI SMITH, SUANNE COX, LISA B. FETTINGILL, HARJIT CHAVAL, TRIZLIN J. WALLACE, HOLLY CARTER, FRANTZ GERRA, JULIO DELVALLE, ANN OILE, KATHLEEN ADAMS, EMILY OLAM, GEOFFREY HAMPESSAD, SHELBY WOODS, NANNY DUDLEY, EUGENE HERRERA, CHRISTINA MILLER, LORI A. SAWYER, FRED HERRERA, APRIL HOLT, SLOBODANKA BILIC, SHARI RUFF, DONALD E. GOFF, JR., TANYA RIGGS, JENNIFER D'ALE, SHANTA MAHADEO, CHRISTOPHER LOPEZ, RICARDO MALLARI, DEBORAH HEDRICK, JASON VALLE, AMY MILLER, ALFA LAUREANO, REINA DAIL, KIM CLACKUM, MELANIE MCGOVERN, JENNIFER O'BRIEN, MONICA VEGA, CHRISTINE MORTON, LILIANA JOHNSON, BEN CHANG EDM TEST, STEPHANIE HOOPER, TAMMY BROWN OF LAKE MARY, FLORIDA

their true and lawful Attorney(s)-in-Fact, each in their separate capacity if more than one is named above, to sign its name as surety(ies) only as delineated above by ☒, and to execute, seal and acknowledge any and all bonds, undertakings, contracts and other written instruments in the nature thereof, on behalf of the Companies in their business of guaranteeing the fidelity of persons, guaranteeing the performance of contracts and executing or guaranteeing bonds and undertakings required or permitted in any actions or proceedings allowed by law.

In Witness Whereof, and as authorized by a Resolution of the Board of Directors of the Companies on July 21, 2003, the Companies have caused these presents to be signed by its Assistant Vice President and its corporate seals to be hereto affixed, duly attested by its Assistant Secretary. Further, pursuant to Resolution of the Board of Directors of the Companies, the Companies hereby unambiguously affirm that they are and will be bound by any mechanically applied signatures applied to this Power of Attorney.



Paul A. Bergenholtz

Paul A. Bergenholtz, Assistant Secretary

David T. Akers

David T. Akers, Assistant Vice President

STATE OF CONNECTICUT

COUNTY OF HARTFORD

ss. Hartford

On this 4th day of August, 2004, before me personally came David T. Akers, to me known, who being by me duly sworn, did depose and say: that he resides in the County of Hampden, Commonwealth of Massachusetts; that he is the Assistant Vice President of the Companies, the corporations described in and which executed the above instrument; that he knows the seals of the said corporations; that the seals affixed to the said instrument are such corporate seals; that they were so affixed by authority of the Boards of Directors of said corporations and that he signed his name thereto by like authority.



CERTIFICATE

Scott E. Paseka

Scott E. Paseka
Notary Public

My Commission Expires October 31, 2007

I, the undersigned, Assistant Vice President of the Companies, DO HEREBY CERTIFY that the above and foregoing is a true and correct copy of the Power of Attorney executed by said Companies, which is still in full force effective as of November 28, 2006 Signed and sealed at the City of Hartford.



Gary W. Stumper

Gary W. Stumper, Assistant Vice President