

FEDERAL COMMUNICATIONS COMMISSION
445 12th Street, SW
Washington, DC 20554

June 29, 2018

Walter N Iwachiw RN
World Network International Services Inc.
48 35 41 Street
Sunnyside, NY 11104-3121

Re: Short-Form Application of World Network International Services Inc. for Auction 903 – Listing of Application Deficiencies

Dear Applicant:

Final review of your short-form application (FCC Form 183) to participate in the upcoming Connect America Fund Phase II Auction (Auction 903) has been completed. Final review of your application, as supplemented following prior notice identifying how it was incomplete or deficient, revealed that it was still incomplete or deficient, and it has been classified as such in the public notice, “220 Applicants Qualified to Bid in the Connect America Fund Phase II Auction (Auction 903); Bidding to Begin on July 24, 2018,” DA 18-658, released on June 25, 2018. The public notice is available under the “Documents” tab on the Connect America Fund Phase II Auction website at www.fcc.gov/auction/903.

The deficiencies identified by the final review of your short-form application are listed below.

This action is taken under delegated authority pursuant to sections 0.291 and 0.331 of the Commission’s rules. You may seek review of this staff determination by filing an application for review with the Commission within 30 days of the date of this letter pursuant to section 1.115 of the rules.

Application Deficiencies:

1. The financial information provided in the application is insufficient to demonstrate that the applicant is qualified to participate in the auction. 47 CFR §§ 54.315(a)(2), (a)(7); Connect America Fund Phase II Auction Scheduled for July 24, 2018; Notice and Filing Requirements and Other Procedures for Auction 903, Public Notice, FCC 18-6, para. 46. The applicant did not submit audited financial statements with an unmodified opinion, nor did the applicant provide proper unaudited financial statements, and the applicant’s financial data show that its operating margin, and equity ratio are below the relevant thresholds, resulting in a total financial score of 2 on the Commission’s five-point scale. *Id.* at 49. Pursuant to the Commission’s foregoing rules and procedures, further review of the applicant’s financial data and the additional financial information provided by the applicant failed to justify the applicant’s certification of its financial qualifications.
2. The application is missing required information regarding the applicant’s operational history and the operational history information provided by the applicant is insufficient or is inconsistent with

information contained elsewhere in the application. 47 CFR § 54.315(a)(7). The applicant certified in its application that it has at least two years of experience providing a voice and/or broadband service, but failed to identify the FCC Registration Number(s) it used to file the FCC Form 477s for the relevant filing periods, as required. Connect America Fund Phase II Auction Scheduled for July 24, 2018; Notice and Filing Requirements and Other Procedures for Auction 903, Public Notice, FCC 18-6, para. 42.

3. The network information provided in the application is insufficient to demonstrate that the applicant is technically qualified to participate in the auction. 47 CFR §§ 54.315(a)(2), (a)(4)-(5); Connect America Fund Phase II Auction Scheduled for July 24, 2018; Notice and Filing Requirements and Other Procedures for Auction 903, Public Notice, FCC 18-6, para. 67, Appendix A. The answers in the network information attachment to the specific operational questions listed in the Auction 903 Procedures Public Notice lack sufficient details about the applicant's proposed network deployment and thus fail to justify the applicant's certification of its technical qualifications, pursuant to the Commission's foregoing rules and procedures.

4. The application fails to adequately demonstrate that the applicant has the proper authorizations, if applicable, and access to operate on the spectrum that the applicant plans to use to meet its obligations in the areas for which it will bid for support for at least 10 years from funding authorization, as required. 47 CFR § 54.315(a)(6); Connect America Fund Phase II Auction Scheduled for July 24, 2018; Notice and Filing Requirements and Other Procedures for Auction 903, Public Notice, FCC 18-6, para. 87.