

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Connect America Fund)	WC Docket No.
)	
World Network International Services Inc.)	
Petition for expedited review.)	
§ 1.106 Petitions for reconsideration in non- rulemaking proceedings, regarding FCC 903 auction short form.)	
Request for Waiver of the Connect America Fund Phase II Competitive Bidding Rules.		

Walter Iwachiw RN SPNP on behalf of World Network International Services Inc. hereby files a petition requesting an expedited reconsideration of the staff action taken as enumerated Application Deficiencies 1,2,3,4 in the letter dated June 29, 2018 re: Short-form Application of World Network International services inc. for Auction 903-listing of Application deficiencies.

This action seeks a waiver of the Connect America Fund Phase II competitive rules relative to the disqualification of World Network International Services inc. a DOBE self certified company.

This action requesting reconsideration of the disqualification taken by delegated authority to the FCC staff and seeks to reverse the erred decision making by the staff of the WCB, WTC which disqualified World Network International Services Inc. denying a reasonable timely right to participate in the FCC 903 Auction. The application described new disruptive patent pending technology that provides 1 Gigabit/500 mb Broadband and VOIP over that Spread Spectrum Broadband supported by

Satellite Constellations such as the one submitted by SpaceX and approved by the FCC on March 28, 2018 SpaceX petition.

<https://www.fcc.gov/document/fcc-authorizes-spacex-provide-broadband-satellite-services>

<https://techcrunch.com/2018/03/29/fcc-approves-spacex-plan-for-4425-satellite-broadband-network/>

Short-form application. Adopt procedures to collect information in the pre-auction short-form application to ensure applicants are technically and financially qualified to participate in the auction.

On January 9, 2018 the FCC adopted a new experimental short form application procedure to determine 10 years of future financial Support which has unexpected effect as exercised by the WCB WTC staff of rigging future financial support by disqualifying WNIS

World Network International Services Inc. (WNIS) began filling the Short form application for the FCC 903 auction with the same proposed speeds contained in the approved SpaceX petition before the FCC ruled on it on March 28, 2018.

By reference WNIS incorporates the FCC 903 Short form application, the FCC 903 supplemental short form application and all its attachments in this petition for reconsideration as evidence.

The following rules for reconsideration apply:

As to;

§ 1.106 Petitions for reconsideration in non-rulemaking proceedings.

(d)

(1) A petition for reconsideration shall **state** with particularity the respects in which petitioner believes the action taken by the **Commission** or the designated authority should be changed. The petition shall **state** specifically the form of relief sought and, subject to this requirement, may contain alternative requests.

Item

WNIS seeks the admission of new evidence as to the recent change in company status to a DOBE (Disabled Owner Business Enterprise) due to the June 11, 2018 Administrative Judges findings of disability of Walter Iwachiw the owner of WNIS and

seeks protection and benefits under the American's with Disability Act for WNIS covering the FCC 903 Auction review and process.

The Commission may sua sponte vacate the stated application deficiencies 1,2,3,4 and reinstate the short form application listing World Network International Services Inc. as a qualified bidder in FCC 903 Auction. The petitioner argues that the staff decisions are arbitrary, capricious and based on the unfortunate involvement of organized crime in accessing the Universal Fund dollars as evidenced by the trials and tribulation of the WNIS Company and its staff.

As to;

(2) (i) The petition relies on facts or arguments which relate to events which have occurred or circumstances which have changed since the last opportunity to present such matters to the [Commission](#); or

WNIS relies on both past events and changes since JUNE 5, 2018 deadline for submission of the supplemental amended short form application.

Based on the SSA June 14, 2018 favorable disability determination for Walter Iwachiw, the 100 percent owner of WNIS, this petition seeks to change the short form to avail the WNIS company of benefits under the SBA SBE/DOBE certifications and avail itself of protections under the Americans with Disabilities Act.

As to;

(d)

(1) A petition for reconsideration shall [state](#) with particularity the respects in which petitioner believes the action taken by the [Commission](#) or the designated authority should be changed. The petition shall [state](#) specifically the form of relief sought and, subject to this requirement, may contain alternative requests.

The petitioner is a facility based phone company in NYS formed in 1996 and debt authorization for 3 billion and extorted and embezzled by ATT, the Baby bell and organized crime intent on criminally obtaining the facilities of World Network International Services Inc. and the WNIS Sales ISP facilities in 620 Johnson Avenue, Bohemia NY in 1996 in order to submit for Universal funds on behalf of NYC BOE, BOCES , NYC, NYS Government and utilizing

organized crime to destroy equipment and cause 3 spinal injuries to Walter Iwachiw and begin operations under the name of Villagenet.com. The petitioner also requests that the FCC commission provide records of all payments rendered to Villagenet.com since 1996 under the Freedom of Information Act.

Argument general

The petitioner believes that the 4 points stated in the listings of applicant deficiencies in letter dated June 29, 2018 are factually incorrect, a distortion of the rules, create new unreasonable unanticipated disqualifications and subjective in nature as evidenced by the FCC granting of the SpaceX petition on March 28, 2018 for the same proposed topologies and further evidenced by the patent applications of Walter Iwachiw RN from 1999 cross licensed to World Network International Services Inc. for the same network topologies that SpaceX was approved for on March 29 2018 some 20 years later. It is unreasonable to deny the patent rights of Walter Iwachiw and the license rights of World Network International Services Inc. by disqualifying WNIS and withholding financial support to deploy the patent technologies. Effectively bid rigging by limiting who can participate.

The Company believes the disqualifications arise out of a unconscious bias reaction to the extraordinary acts against the company and staff as it relates to lack of FCC oversight of AT&T and the Baby Bells since the 1996 extortion of the WNIS pop facilities in Bohemia N.Y., Plainview N.Y., Huntington N. Y. Greenport N.Y. Long Island City and Manhattan.

A public interest defense exists as it relates to the NYS Broadband auction waiver of Connect America phase 2 auction rules by which exclusion eviscerates the proposed high speed broadband funding to NYS residents, the now the same on the Federal Level absent corrective action.

As to item Jan 9, 2018 FCC FACT SHEET*

Connect America Fund Phase II Auction (Auction 903)

Public Notice - AU Docket No. 17-182

Short-form application. Adopt procedures to collect information in the pre-auction short-form application to ensure applicants are technically and financially qualified to participate in the auction.

ITEM deficiencies 1. Financial information

WNIS seeks to strike in its entirety the cited Application deficiencies 1. in the above named letter listings of application deficiencies.

As to this item

94 CAF II Auction Comment Public Notice, 32 FCC Rcd at 6256, para. 58.

95 Financial metrics refer to the financial information that is scored using the five-point scale, see attached Jan 9, 2018 technical items.

WNIS argument

The five point system is arbitrary and capricious as it does not take into account the consortium formed after the July 24, 2018 auction completes the rounds and companies are incorporated to service the awards.

The scoring here is based on unaudited numbers which does not take into account tangible assets and 3 billion in unused NYS PSC authorized debt for infrastructure construction and court judgments not yet collected and future judgments to be litigated.

I, Walter Iwachiw, RN SPNP did adjust the financial data in the supplemental short form application incorporating the value of installed conduit and I affirm upon information and belief and penalty of perjury that the supplemental form was submitted with a form filled score of 3.

This is a factual mistake by the FCC delegated Staff or a computer form error that showed a score of 3 to me before submitting and certifying the filing of the application.

As to this item ;

From January 9, 2018

42. If an applicant (or its parent company) is not audited in the ordinary course of business and the applicant does not submit its audited financial statements with the short-form application, it must certify that the long-form applicant will submit its (or its parent company's) audited financial statements from the prior fiscal year within 180 days after being announced as a winning bidder.⁸⁴ We also adopt the proposal to require such an applicant to submit its (or its parent company's) fiscal year-end 2016 unaudited financial statements with its short-form application, including balance sheet, net income, and cash flow.⁸⁵ An applicant that

certifies in its short-form application that it will submit audited financial statements during the long-form application process, but then ultimately fails to submit such statements, will be deemed to be in default and subject to a forfeiture.

WNIS argument

WNIS did certify that it would supply 3 years of audited financials within 180 days. Hence WNIS was disqualified by a delegated staff error in interpretation of the rules and now in violation of the ADA act as well, discriminating against the disabled Owned business enterprise in violation of Federal bidding rules.

(7) Submit specified operational and financial information.

(i) Submit a certification that the applicant has provided a voice, broadband, and/or electric transmission or distribution service for at least two years or that it is a wholly-owned subsidiary of such an entity, and specifying the number of years the applicant or its parent company has been operating, and submit the financial statements from the prior fiscal year that are audited by a certified public accountant. If the applicant is not audited in the ordinary course of business, in lieu of submitting audited financial statements it must certify that it will provide financial statements from the prior fiscal year that are audited by a certified independent public accountant by a specified deadline during the long-form application review process.

WNIS Argument

World Network International Services Inc. did provide the certification that it operated for at least 2 years, and it would provide 3 years of audited financial statements in the long form application review process. There was a question posed to the staff whether it was three years or one year of audited financials were required but no response was received.

WNIS did qualify as a bidder in FCC auction 903 but for the red herring of not submitting 2 years of FCC form 477

The staff erred in disqualifying World Network International Services Inc. on financial grounds during the Short Form review. Additionally, World Network International Services Inc. submitted the 3 Billion Dollar debt authorization by NYS Public Service Commission for infrastructure

“ Short-form application. Adopt procedures to collect information in the pre-auction short-form Application to ensure applicants are technically and financially qualified to participate in the auction. ”

WNIS provided a copy of the NYS PSC certification of necessity authority on Dec 18.1996 as a facility based phone company while being extorted by organized crime, AT&T and the local bell company.

The question of financial qualifications revolves around the 3 billion in debt authorization by NYS PSC and similar amounts from each and every state in which ETC is requested and received, to be determined after the July 24, 2018 auction.

As to this Item

(2) *Certify that the applicant is financially and technically qualified to meet the public interest obligations of [§ 54.309](#) for each relevant tier and in each area for which it seeks support;*

From Jan 18, 2018

Eligibility to participate in the Phase II auction is based on an applicant's short-form application and certifications.

WNIS did certify it is financially and technically qualified are required.

The staff erred by disqualifying WNIS.

As to this Item

(ii) If an applicant cannot meet the requirements in [paragraph \(a\)\(7\)\(i\)](#) of this section, in the alternative it must submit the audited financial statements from the three most recent fiscal years and a letter of interest from a bank meeting the qualifications set forth in [paragraph \(c\)\(2\)](#) of this section, that the bank would provide a letter of credit as described in [paragraph \(c\)](#) of this section to the bidder if the bidder were selected for bids of a certain dollar magnitude.

(c)Letter of credit. Before being authorized to receive Phase II auction support, a winning bidder shall obtain an irrevocable standby letter of credit which shall be acceptable in all respects to the Commission.

(2) The bank issuing the letter of credit shall be acceptable to the Commission. A bank that is acceptable to the Commission is:

(i) Any United [States](#) bank

(A) That is insured by the Federal Deposit Insurance Corporation, and

(B) That has a bank safety rating issued by Weiss of B- or better; or

(ii) CoBank, so long as it maintains assets that place it among the 100 largest United [States](#) Banks, determined on basis of total assets as of the calendar year immediately preceding the issuance of the letter of credit and it has a long-term unsecured credit

rating issued by Standard & Poor's of BBB- or better (or an equivalent rating from another nationally recognized credit rating agency); or

(iii) The National Rural Utilities Cooperative Finance Corporation, so long as it maintains assets that place it among the 100 largest United [States](#) Banks, determined on basis of total assets as of the calendar year immediately preceding the issuance of the letter of credit and it has a long-term unsecured credit rating issued by Standard & Poor's of BBB- or better (or an equivalent rating from another nationally recognized credit rating agency); or

(iv) Any non-United [States](#) bank

(A) That is among the 50 largest non-U.S. banks in the world, determined on the basis of total assets as of the end of the calendar year immediately preceding the issuance of the letter of credit (determined on a U.S. dollar equivalent basis as of such date);

(B) Has a branch office in the District of Columbia or such other branch office agreed to by the Commission;

(C) Has a long-term unsecured credit rating issued by a widely-recognized credit rating agency that is equivalent to a BBB- or better rating by Standard & Poor's; and

(D) Issues the letter of credit payable in United [States](#) dollars

WNIS argument

The supplemental Amended short form as submitted by myself contained a computer filled score of 3 which in the teleconference was declared as the minimum required to participate in the FCC 903 Auction. How the score became 2 as per the letter of disqualifications is a mystery at this point.

The petitioner claimed the alternate pathway as proof of financial qualification which required the production of audited financials for the three prior years. This production is due during the long form application period and after the FCC 903 Auction awards and WNIS also produced the required letter of interest for the SBLC (Stand By Letter of Credit) from Newcomb Associates an Investment Bank.

The petitioner also submitted the debt authorization for 3 Billion in debt for infrastructure which is to be used for the FCC 903 Auction.

The Petitioner also submitted WTC court claims that total over several billion as part of the perfected judgment under JASTA cases which have just been moved from intangible to tangible assets on the financial statements.

WNIS provided its NYS PSC authority to operate as an eligible telecommunication carrier in 1996 with access to the full complement of Verizon services as a reseller of Verizon services covered under the interconnect agreement.

<http://newcombandcompany.us/fnsrbio.php>

WNIS Argument

World Network International Services Inc. did receive and submit the letter of interest as required in the Short form application.

The staff erred in disqualifying World Network International Services inc. of financial, operational and spectrum

ITEMs deficiencies 2. operational history.

WNIS seeks to strike in its entirety the cited Application deficiencies 2. in the above named letter listings of application deficiencies.

As to Item

(A) If the applicant has provided a voice and/or broadband service it must certify that it has filed FCC Form 477s as required during this time period.

WNIS Argument

The FCC Form 477 did not exist during the 2 year operational history of WNIS which began in 1996.

FCC Form 477 is not required of WNIS per the FCC and WNIS is current in all required FCC Form 477 filings.

As for Item

(2) Certify that the applicant is financially and technically qualified to meet the public interest obligations of [§ 54.309](#) for each relevant tier and in each area for which it seeks support;

WNIS did certify it was financially and technically qualified and supplied copies patent applications and followed the

As to Item

(7) Submit specified operational and financial information.

(i) Submit a certification that the applicant has provided a voice, broadband, and/or electric transmission or distribution service for at least two years or that it is a wholly-owned subsidiary of such an entity, and specifying the number of years the applicant or its parent company has been operating, and submit the financial statements from the prior fiscal year that are audited by a certified public accountant. If the applicant is not audited in the ordinary course of business, in lieu of submitting audited financial statements it must certify that it will provide financial statements from the prior fiscal year that are audited by a certified independent public accountant by a specified deadline during the long-form application review process.

WNIS Argument

World Network International Services Inc. did provide the certification that it operated for at least 2 years, and it would provide audited financial statements in the long form application review process.

The staff erred in disqualifying World Network International Services Inc. on financial grounds during the Short Form review. Additionally, World Network International Services Inc. submitted the 3 Billion Dollar debt authorization by NYS Public Service Commission for infrastructure

“ Short-form application. Adopt procedures to collect information in the pre-auction short-form Application to ensure applicants are technically and financially qualified to participate in the auction. ”

World Network International Services Inc. was established and operated starting in 1996 but was the target of organized crime, embezzlement and extortion by parties seeking to eliminate competition to AT&T and the local Bell Company, for bid rigging in NYS/NYC and later to gain access to the Universal Fund Dollars, when the funds first became established after 1999. The facilities were taken by force causing 3 spinal injuries to the owner of WNIS. Then in 2000 Mr. Gersh did attempt an attempted murder on the Owner. Then in 2001 the WTC facilities were destroyed. Then 2003 the owner was drugged in an effort to embezzle the 496 million WTC URIR grant to WNIS. The SSA Administrative Judge on June 11, 2018 granting Disability status and opening the request for new evidence and DOBE certification for WNIS.

The staff erred in linking the 2 year operating history to the submission of the FCC 477 Form which did not exist when WNIS operated for 2 years, starting with the NYS PSC authority.

The petitioner claimed and certified that since 1996 there has been 2 years of required telecom and power distribution but was done before there was a form FCC 477. Nowhere in the FCC auction does 903 documentation the 2 years of required operations and services experience need to be done during the FCC Form 477 lifespan.

WNIS has not been required to file FCC 477 since the 1996 extortion of the POP facilities and the destruction of the WTC facilities in 2001, which rendered the infrastructure inoperable.

The Staff erred decision, seems too unreasonably and incorrectly associate the two (FCC form 477 completion and 2 years of operations) together. WNIS operated when there was no FCC form 477 or was not required to file the FCC form 477.

The scoring system does not take into account companies that have had extraordinary events inflicted on them and as such are bias against companies affected by organized crime, natural disasters or other uncontrollable conditions like disability.

As to the item

Jan 9, 2018 document

We expect a holding/parent company or a consortium/joint venture short-form applicant that intends to form a new operating company if it is named as a winning bidder to take whatever steps are necessary to form the operating company in advance of the long-form application filing deadline.

WNIS argument

As indicated in the short form submission by WNIS, which intends to acquire companies (a consortium) to satisfy the operational, financial, spectrum and Networking capabilities consistent with the FCC 903 auction awards on July 24, 2018 and in response to the extraordinary criminal activities against the company by those under the FCC umbrella of regulated companies.

The Short form application review exceeded its authority and scope and shall be revoked and WNIS given full qualification status. This delay has already impinged on the applicant's ability to participate in the JULY 9, workshops and mock bidding by being drawn into defending against a patently false 4 reasons for disqualification.

The preemptive decision by the staff lends credibility that the offer of WNIS in the short form does result in a full sweep of the FCC 903 Auction by WNIS, requiring the extraordinary step of preemptively disqualifying a ADA protected Disabled Owned Business Enterprise from the auction and 10 years of future support in a single letter..

ITEM deficiencies 3. Network information

WNIS seeks to strike in its entirety the cited Application deficiencies 3. in the above named letter listings of application deficiencies.

As to Item

(2) Certify that the applicant is financially and technically qualified to meet the public interest obligations of [§ 54.309](#) for each relevant tier and in each area for which it seeks support;

WNIS did certify it is financially and technically qualified are required.

The staff erred by disqualifying WNIS.

WNIS did certify it was financially and technically qualified and supplied copies patent applications and followed the alternate pathway to financial and technical qualifications.

The financial by providing 3 years audited in long form application period and acquisition of consortium members to add to the existing operational, networking and spectrum capabilities existent at the short form application period.

The disqualification was preemptive and unreasonably based on the short form applicants ahead of the stated consortium amalgamated post auction consistent with the rules which allow for post short form application period.

ITEM deficiencies 4. Spectrum availability

As to this Item

(6) To the extent that an applicant plans to use spectrum to offer its voice and broadband services, demonstrate it has the proper authorizations, if applicable, and access to operate on the spectrum it intends to use, and that the spectrum resources will be sufficient to cover peak [network](#) usage and deliver the minimum performance requirements to serve all of the fixed locations in eligible areas, and certify that it will retain its access to the spectrum for at least 10 years from the date of the funding authorization; and

WNIS claims the “If applicable” clause has been used unreasonably to limit WNIS short form application ahead of the spread spectrum auction beginning in NOV 2018.

WNIS also provided information on how spectrum can be licensed as needed based on which services could be provided in conjunction with free spectrum currently available. Additionally cellular frequencies are available for sharing for a fee nationally.

The staff unreasonably with bias interpreted the rules to unreasonably preemptively disqualify the WNIS short form application mixing present and future use of spectrum and authorization thereof.

As to this Item

(2) Certify that the applicant is financially and technically qualified to meet the public interest obligations of [§ 54.309](#) for each relevant tier and in each area for which it seeks support;

WNIS did provide certification and improperly disqualified.

WNIS seeks to strike in its entirety the cited Application deficiencies 4. in the above named letter listings of application deficiencies.

<https://www.zdnet.com/article/gigabit-wi-fi-802-11ac-is-here-five-things-you-need-to-know/> 3 channels 1.3 gig

The staff erred by disqualifying WNIS.

As to this Item

(3) Disclose its status as an [eligible telecommunications carrier](#) to the extent applicable and certify that it acknowledges that it must be designated as an [eligible telecommunications carrier](#) for the area in which it will receive support prior to being authorized to receive support

Provided proof that WNIS was a ETC in NYS but NYS was not participating in FCC 903 auction by Waiver granted by FCC.

As to this item

(2) A petition for reconsideration of a decision that sets forth formal findings of fact and conclusions of law shall also cite the findings and/or

conclusions which petitioner believes to be erroneous, and shall [state](#) with particularity the respects in which he believes such findings and/or conclusions should be changed. The petition may request that additional findings of fact and/or conclusions of law be made.

WNIS seeks a finding of fact that given the unique circumstances with WNIS operational, financial, and technical history relating to infrastructure theft and damage is not adequately addressed in the rules and the rules were interpreted with unreasonable bias by the staff. The

WNIS argument

The petitioner does request that additional findings of fact and or conclusions of law be made regarding the issues raised in the letter dated June 29, 2018 overriding numbered application deficiencies. Plus a determination of the eligibility of WNIS for SBA SBE/DOBE set asides or bidding set asides or procedural defects under the Americans with Disability Act with regards to access to Government contracts and bidding.

as to this item

(f) The petition for reconsideration and any supplement thereto shall be filed within 30 days from the date of public notice of the final [Commission](#) action, as that date is defined in [§ 1.4\(b\)](#) of these rules, and shall be served upon parties to the proceeding. The petition for reconsideration shall not exceed 25 double spaced typewritten pages. No supplement or addition to a petition for reconsideration which has not been acted upon by the [Commission](#) or by the designated authority, filed after [expiration](#) of the 30 day period, will be considered except upon leave granted upon a separate pleading for leave to file, which shall [state](#) the grounds therefor.

The final date to submit a timely petition for reconsideration electronically is July 10, 2018 based on the June 25 ,2018 publication of the qualified bidders.

<https://www.fcc.gov/document/fcc-qualifies-220-bidders-connect-america-fund-auction-903>

And JULY 30, 2018 being the timely deadline for appeals for the letter, but that is past the auction date and moot after July 24, 2018 auction.

Therefore the application is being humbly submitted today July 10, 2018 and WNIS and Walter Iwachiw RN SPNP prays for the quickest possible restoration of rights denied by the disqualification, fully based on bias unreasonable unintended application of the rules and gross errors in interpretation which exceeded the scope and practice of short form review process in this experimental pre auction short-form process. Which is actually acting to inhibit disabled participation , small business participation, and preventing bidding by a larger group of bidders.

To <https://www.fcc.gov/ecfs/filings/express/confirm>

Filed to Secretary, Federal Communications [Commission](#), Washington, DC 20554, by electronic submission through the [Commission's](#) Electronic Comment Filing System.

In conclusion the letter dated June 29, 2018 from FCC re: Short form application of World Network International Services Inc. for Auction 903 listing of Application Deficiencies should be vacated completely sua sponte due to the time constraints in the automated auction staring on July 24, 2018.

That on clear and convincing evidence herein. That World Network International Services Inc. satisfies the lower level of scrutiny intended by the implementation of the short form application process.

World Network International Services Inc is hereby deemed by an order from the Administrative Judge or Commissioners qualified to participate in the FCC 903 auction on July 24, 2018 in the interest of justice and pursuit of higher speeds for the Rural American population and Telemedicine.

Furthermore, ordering that WNIS be classified as a disabled business enterprise for the FCC 903 Auction and future upcoming spread spectrum auctions pursuant to the findings of the administrative SSA Judge dated June 14, 2018, that Walter Iwachiw was disabled at least back to 2016, but will ultimately be drawn back to the 1996 extortion of WNIS telecom facilities in Bohemia NY where the spinal injuries were first incurred in order to access the universal funds for NYC/NYS schools, libraries, and governments.

Alternately in the interest of justice and fairness petitioner requests a hardship waiver of the FCC 903 Auction rules as it pertains to the outlier short form application of World Network International Services inc. which does not fit the FCC anticipated short form filler profile.

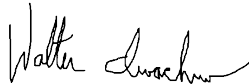
**Respectfully submitted by Walter Iwachiw RN SPNP for
World Network International Services Inc.**

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347 239 0965

A handwritten signature in black ink, appearing to read "Walter Iwachiw". The signature is written in a cursive, flowing style.