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VIA TELECOPY
(Original via U.S. Mail)

27 January 2000

File #2105

Ms. Lynn Vermillera
Federal Communications Commission
445 12th Street
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

**Re: International Exchange Communications, Inc.'s Acquisition of
Customer Bases of FiberTel, Inc., North American Telephone
Network, LLC, and Advantage Telecommunications Corp.
CC Docket No. 94-129**

Dear Ms. Vermillera:

This letter is in response to your questions regarding the Supplemental and Amended Petition for Waiver of Commission Rules recently filed by International Exchange Communication, Inc. ("IECOM") that you posed on the telephone on Monday, January 24, 2000.

First, IECOM does not intend to purchase the entire customer base of NOSVA Limited Partnership ("NOSVA"). According to the Asset Purchase Agreement between the two companies, IECOM only agreed to purchase the entire customer base of NOSVA's "international operating division which markets under the brand names 'International Plus' and '011 Communications' ... and all residential ... international end-user long distance telecommunications customer accounts thereof." (See Exhibit G, § 1.1(a), p. 2). Furthermore, IECOM did not agree to purchase any assets or customers of Affinity, a related company of NOSVA. Therefore, it is our understanding that NOSVA and its related companies will continue to operate and provide telecommunications services to their customers whose accounts will not be switched to IECOM as part of the instant transaction.

Second, as a result of its due diligence conducted in this matter, IECOM is aware of the nature and extent of the problems NOSVA's customers had with its billing practices. However, I have confirmed that these problems will not continue for those customers switched to IECOM as part of the instant transaction.

If you have any additional questions or need further information, please feel free to contact me at the address or telephone number above.

Ms. Lynn Vermillera
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With kind regards, I remain

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew L. Kramer". The signature is fluid and cursive, with a prominent initial "A" and a long, sweeping underline.

Andrew L. Kramer

ALK/jjh

cc: Office of the Secretary (via U.S. mail only)
Ben Bronston, Esq. (via telecopy only)