

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

In the Matter of)	IB Docket No. 02-286
)	File Nos. ISP-PDR-20020822-0029;
GLOBAL CROSSING, LTD.)	ITC-T/C-20020822-00406
(Debtor-in-Possession),)	ITC-T/C-20020822-00443
)	ITC-T/C-20020822-00444
Transferor,)	ITC-T/C-20020822-00445
)	ITC-T/C-20020822-00446
and)	ITC-T/C-20020822-00447
)	ITC-T/C-20020822-00449
)	ITC-T/C-20020822-00448
GC ACQUISITION LIMITED,)	SLC-T/C-20020822-00068
)	SLC-T/C-20020822-00070
Transferee)	SLC-T/C-20020822-00071
)	SLC-T/C-20020822-00072
Application for Consent to Transfer)	SLC-T/C-20020822-00077
Control and Petition for Declaratory)	SLC-T/C-20020822-00073
Ruling)	SLC-T/C-20020822-00074
)	SLC-T/C-20020822-00075
)	0001001014

**COMMAXXESS' SUPPLEMENTAL RESPONSE IN OPPOSITION
TO THE APPLICANTS FOURTH AMENDED APPLICATION FOR CONSENT TO
TRANSFER CONTROL AND PETITION FOR DECLATORY RULING.**

COMMAXXESS provides the following as a supplemental response to the June 30, 2003 filing submitted by the Applicants as the "Fourth Amendment for Consent to Transfer Control and Petition for Declaratory Ruling" to matters filed before this Commission.

The following two emails come directly to this Respondent from a former Global Crossing Senior Network Engineer who is intimately familiar with the issues and potential security threats posed by the EBS network that was disclosed by this Respondent on August 7. These same security risks are inherent in the IPC Information Systems network that was dumped off to Goldman Sachs less than sixty (60) days before the Global Crossing Chapter 11 was filed and other network services offered to a wide range of customers and industry sectors.

First of two emails:

Karl,

In regard to EDS/EBS organization, which I believe is known as "Dealing Resources", this group funded by a private consortium of financial institutions and overseen by the federal reserve, is a global trading network for bank to bank, anonymous foreign currency exchange.

To provide names of trading institutions participating would compromise the anonymous nature of the trading system and further compromise its members anonymity and their trading position.

IDT noted in a recent July filing to the FCC, the owner of STT, Temasek holdings is ultimately the minister of finance of Singapore, who is also the son of the founder of modern Singapore.

Conflicts of interest should be apparent, when an entity "Singapore" whose currency is anonymously traded in the global currency market, as well as their ownership and control of Singapore's central bank, which most likely engages in currency foreign trading as well, should these entities obtain a listing of the members of the EDS/EBS trading network, through ownership of Global Crossing, not only compromising the anonymous nature of such trading but give STT parent, the Singapore ministry of finance a clear unfair advantage (knowledge of other member traders)

The foreign currency trading networks of Reuters and EDS/EBS are ever expanding to include hundreds of banks and their regional affiliates, hence mere access to a customer list, billing record, account information would be detrimental to the positions of the other traders.

Consider also, the U.S. Federal Reserve, U.S. Treasury, FCC nor any U.S. government agency has a controlling interest in any U.S. telecommunications company or any U.S. company whatsoever.

We can see already that Singapore is unfairly using its diplomatic relations with the U.S. government as a government entity, to influence a favorable outcome of its private enterprise and furthermore, the government of Singapore is using its membership in the WTO and a recent treaty with the U.S., to further its own business interest in STT acquisition of Global Crossing.

Let their own actions serve as evidence of what to expect in the future from STT and the government of Singapore, its minister of finance, openly using

political power of Singapore's government to further their own private enterprise, can anyone reasonably expect they will not act on conflicts of interest to their own advantage ?

Can anyone reasonably expect the government of Singapore won't use its controlling interest in STT and Singtel to dominate the Asian telecommunications industry, engaging in unfair business practices and worse imposing unfair tariffs on competitors in their local markets?

Regards,

Second of two emails:

Karl,

If I may further advise, the trading network of EDS/EBS Dealing Resources, uses Global Crossing and several other carriers for long-haul and local DDS service.

Don't know how many circuits are on the other networks however GC has only a small portion of the total and may not actually provide links to all of the trading banks involved, as with the other carriers who don't provide DDS links to every trading bank.

For the purpose of daily business this diversity is optimum to ensure the entire network isn't affected by individual carrier outages or widespread outages affecting multiple carriers as occurs during fiber cuts and failures in LEC networks that often provide last mile connections to banks and nodes.

This diversity can't compensate for major outages affecting for example, 10 bank circuits longer than 1 hour because it compromises the trading position of the affected banks, where even a single isolated bank is not a good situation.

Problem is that competing banks sometimes eventually discover that a certain bank is isolated or is lagging and those banks can gain an unfair advantage over the isolated bank.

At stake with the integrity of this network is the health and stability of the U.S. economy and global economy, as well as the strength of the U.S. dollar and other foreign currencies.

On the matter of Singapore, leveraging its government authority and influence, not to mention extending the authoritarian nature of Singapore's government into the

U.S. by proxy of STT.

This is clearly a matter the U.S. congress must be permitted to consider at its leisure without being hindered or unduly constrained to render a premature decision, according to the time limits and scheduling of Global Crossings exclusivity agreement or at the political will of a foreign power who stands to gain financially.

Congress ought to be compelled to impose a moratorium on any foreign transaction like the STT deal, until they can diligently determine exactly what is in the public's interest, as IDT points out the proposed STT/GX merger exceeds the scope, limitations and objectives of the statutes.

The STT deal undermines the principals of the U.S. constitution that forbid state and federal governments from owning and operating any business for profit while it loosens the U.S. governments authority to regulate business and trade and enforce rule of law in the U.S.

Respectfully,

Each connection is a direct link or door to some of the major U.S. banks and financial institutions. Those deserve the type of services that will protect those companies and fulfill the intent of the service and why it is provided. In the hands of non-U.S. interests and ownership there is no way for this Commission, CFIUS or STT to guarantee that such protection and network security will occur. In fact, the opposite of security then becomes an economic invitation to breach security or cause lags for trading advantage.

If this Commission and CFIUS will not listen to competing bidders that are offering higher prices for Global Crossing assets, Global Crossing shareholders and former employees (the latter of which have been granted priority claim status in the bankruptcy), and do not represent a threat to national security or U.S. business interests, maybe the federal review authorities will listen to someone who worked for Global Crossing. Someone whose career has been threatened if they did not keep their mouth shut about what has really transpired inside of the fraud that is Global Crossing.

These are not "no harm, no foul" issues. A reverse roll up of Global Crossing, Pacific Crossing and Asia Global Crossing under foreign ownership is literally begging for trouble.

Is the United States government and its taxpayers going to indemnify U.S. financial institutions for the graft and corruption, financial disruption that such a transfer of control could entail? As a taxpayer, this Respondent says "no" and "no way".

The STT – GX proposal is not the most secure, national security friendly or even the most economically rational proposal. It is the most management friendly proposal and one that has total disregard for national security or anyone's interests except STT and GX management. The former senior network engineer clearly knows exactly what that network install was to have accomplished and how vulnerable it would be under non-U.S. ownership.

The COMMAXXESS offer is \$415 million cash now, \$400 million cash over the next 5 years and 38% of the post-bankruptcy Newco stock. The STT deal offers 38.5% of the newco stock, therefore the COMMAXXESS offer is ½ of 1% less on stock but almost 3.5 times as much cash and in all cash terms, not non-cash consideration that can be easily subjected to dilution or devaluation.

Additionally, COMMAXXESS is in negotiations with a firm that currently provides security services to U.S. intelligence agencies to assure that current leaks and threats will be eliminated and a new Global Crossing under new management and U.S. ownership would protect national security. This is a firm that will not be going public any time in the near future due to the nature of its work and clientele.

Respectfully submitted,

Karl W. B. Schwarz
Chairman, Chief Executive
501-663-4959

Dated: August 18, 2003

CERTIFICATE OF SERVICE

I, Karl W. B. Schwarz, hereby certify that on this 18th day of August 2003, I caused a true and correct copy of the foregoing Supplemental Response In Support of National Security Issues to be served on the following parties in the manner indicated:

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