BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Global Crossing, LTD. (Debtor-in-Possession), Transferor,	)	
	)	**IB Docket No. 02-286**
and	)	
	)	
GC Acquisition Limited, Transferee	)	
	)	
Application for Consent to Transfer Control and Petition for Declaratory Ruling	)	

REPLY COMMENTS OF IDT CORPORATION

Pursuant to the FCC's Public Notice of February 20, 2003, IDT Corporation ("IDT") hereby files these reply comments in the above referenced proceeding to address Global Crossing Ltd. and GC Acquisition Limited's amendment to their August 22, 2002, applications seeking consent to transfer control of international 214 authority and submarine cable landing licenses.[1] IDT shares many of the concerns set forth in the further comments filed by American Communications Networks, Inc., and the earlier comments of others regarding the difficulty in obtaining complete, accurate information concerning the ownership of GC Acquisition Ltd.[2] As American Communications Networks points out, a thorough evaluation of GC Acquisition's ownership is critical to a determination that the

[1] *Public Notice*, Global Crossing Ltd. and GC Acquisition Limited File Amendment to Application, DA 03-465 (February 20, 2003).

[2] *See e.g.* Comments of American Communications Network, WT Docket No. 02-286 (March 5, 2003).

transaction would serve the public interest and, without such an evaluation, the requested relief must be denied.[3]

Furthermore, along with other commenters, IDT has serious concerns over the possibility of foreign control of these massive and vital telecommunications networks.[4] IDT submits that placing these facilities under direct or indirect foreign control would not serve the public interest. The public interest would be best served by a transfer of Global Crossing's operations to a company, such as IDT, that does not have foreign ownership interests such as have been so problematic in connection with the GC Acquisition applications. In this regard, IDT has expressed an interest in the purchase of Global Crossing to the representatives of Global Crossing's bankruptcy estate. As such, IDT would be well positioned to assume control of Global Crossing's operations and would provide an alternative to GC Acquisition for maintaining service to Global Crossing's customers.

Respectfully submitted,
IDT Corporation

By: /s/ David Albalah

David Albalah
McDermott, Will & Emery
50 Rockefeller Plaza
11th Floor
New York, NY 10020-1605
(212) 547-5335

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[3] *Id.* at 2-4.

[4] *See e.g.* Comments of Mary Rosendahl, WT Docket No. 02-286 (October 29, 2002); Press Release, IDT Corporation, IDT Corporation to Make Offer for Global Crossing (February 25, 2003) (attached hereto as Exhibit A.).

EXHIBIT A

IDT Corporation
Press Release of February 25, 2003

Since 1990, IDT has been revolutionizing the Telecommunications market.

Corporate Info
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Press Releases

IDT Corporation to Make Offer for Global Crossing

Newark, NJ, February 25, 2003 - IDT Corporation, a multinational carrier, technology and telephone company, today announced its intention to submit an offer to purchase the bankrupt telecommunications company Global Crossing. IDT will submit a bid Tuesday, February 25, 2003 to the representatives of Global Crossing's bankrupt estate. IDT's bid will at least match the economics and be more viable than the bid submitted last August by the Hong Kong-based conglomerate Hutchinson Whampoa Ltd and state-controlled Singapore Technology Pte Ltd.

"Would we give the keys to the Justice Department buildings or the board rooms of some of our largest corporations to a foreign government so they could listen in? Absolutely not. The idea is absurd. Yet a foreign telecommunications company based in communist controlled China, is asking our government for control of Global Crossing, which would give them access to some of our government's and major corporations' most sensitive phone conversations," said Howard Jonas, IDT Chairman. "We do not want to see this happen. An IDT purchase of Global Crossing would be good for Global Crossing management and employees, good for IDT and our shareholders and good for our nation's economy and national security."

"We believe in Global Crossing's potential. The new management team has started to turn the company around. And we believe that Global Crossing's network would be highly synergistic with IDT's local, long distance and data services," said Jim Courter, IDT CEO and Vice Chairman. "IDT is currently one of Global Crossing's top customers. And we believe that the purchase should be accretive to IDT's bottom line."

"As for national security, IDT already has a strong track record of service to the United States Government through IDT Solutions," added Jim Courter.

IDT currently provides telecommunications service to many major US corporations and to many agencies of the federal government, through IDT Solutions (formerly Winstar). IDT Solutions' use of Winstar's unique fixed wireless network delivers reliable local and long distance services, and is capable of providing redundancy for businesses and others seeking back-up services.

On January 14, 2003 The Wireless Communications Association honored IDT Solutions' Winstar for their service to the federal government during the emergency relief efforts following the September 11th World Trade Center attack. WCA gives the Emergency Preparedness Award to a service provider "that enables or will enable a local government to quickly bypass government and/or commercial cable networks damaged by unexpected events."

In addition, the Department of Justice's United States Marshal's Service presented IDT management an award for their outstanding contributions to the government during that national emergency.

IDT Corporation, through its IDT Telecom subsidiary, is a facilities-based, multinational carrier that provides a broad range of telecommunications services to its retail and wholesale customers worldwide. IDT Telecom, by means of its own national telecommunications backbone and fiber optic

network infrastructure, provides its customers with integrated and competitively priced international and domestic long distance telephony and prepaid calling cards. IDT and Liberty Media Corporation own 95% and 5% of IDT Telecom, respectively. IDT Media is the IDT subsidiary principally responsible for the Company's initiatives in media, new video technologies and print media.

On January 9, 2003, IDT announced that it is changing its New York Stock Exchange ticker symbols. Effective February 26, IDT's common stock will trade under the symbol IDT.C. Effective March 19, IDT's Class B common stock will trade under the symbol IDT.

Through its various subsidiaries, IDT has interests in several telecom, Internet-related and media companies. IDT acquired the assets of Winstar Communications in December 2001. IDT Corporation common shares trade on the New York Stock Exchange under the ticker symbols IDT.B and IDT. As of December 12, 2002, there were approximately 54.1 million shares of Class B common stock (IDT.B) outstanding, and approximately 25.0 million shares of common stock (IDT). Of these, approximately 4.0 million shares of Class B common stock and approximately 5.4 million shares of common stock were held by IDT Corporation.

In this press release, all statements that are not purely about historical facts, including, but not limited to, those in which we use the words "believe," "anticipate," "expect," "plan," "intend," "estimate,""target" and similar expressions, are forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995. While these forward-looking statements represent our current judgment of what may happen in the future, actual results may differ materially from the results expressed or implied by these statements due to numerous important factors, including, but not limited to, those described in our most recent report on SEC Form 10-K (under the heading "Management's Discussion and Analysis of Financial Condition and Results of Operations"), which may be revised or supplemented in subsequent reports on SEC Forms 10-Q and 8-K. These factors include, but are not limited to, the following: potential declines in prices for our products and services; our ability to maintain and grow our retail telecommunications services, particularly our prepaid calling card business; availability of termination capacity; financial stability of our customers; our ability to maintain carrier agreements with foreign carriers; effectiveness of our marketing and distribution efforts; increased competition, particularly from regional bell operating companies; our ability to manage our growth; competitiveness of our Winstar subsidiary; impact of government regulation; our ability to obtain telecommunications products or services required for our products and services; and general economic conditions, particularly in the telecommunications markets. We are under no obligation, and expressly disclaim any obligation, to update the forward-looking statements in this press release, whether as a result of new information, future events or otherwise.

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CERTIFICATE OF SERVICE

I, Paul Malmud, do hereby certify that on this 13th day of March 2003, I caused a copy of the foregoing "Reply Comments of IDT Corporation" to be e-mailed to each of the following:

Qualex International
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554
qualexint@aol.com

Susan O'Connell
Policy Division
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554
soconnel@fcc.gov

Kathleen Collins
Policy Division
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554
kcollins@fcc.gov

Henry Thaggert
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554
hthagger@fcc.gov

Zenji Nakazawa
Public Safety and Private Wireless Division
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554
znakazaw@fcc.gov

Neil Dellar
Transaction Team
Office of General Counsel
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554
ndellar@fcc.gov

/s/ Paul Malmud
Paul Malmud