

### FEDERAL COMMUNICATIONS COMMISSION FCC FOREIGN CARRIER AFFILIATIONS NOTIFICATION

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Menu

#### **CARRIER INFORMATION**

CONFIDENTIALITY: Carriers filing foreign carrier affiliation notifications pusuant to Section 63.11 (a) of the Rules, 47 C.F.R §63.11(a), and requesting confidential treatment for the first twenty days pursuant to Sections 63.11(i) and 0.459 of the Rules, 47 C.F.R. §§63.11(i) and 0.459, should not file this form electronically, but instead, should file this form and the required attachments manually. Please send the manual submission to:

Secretary Room TW-B204F 445 12th Street, SW Washington, DC 20554

REMINDER: Carriers filing foreign carrier affiliation notifications are reminded to review the requirements in Section 63.11 of the Rules, 47 C.F.R. §63.11. See *FACT SHEET* 

Note: Use only standard punctuation. Please do not use special characters - such as ';' - in any of the fields below!

Enter a description of this notification to identify it on the main menu:

Trilogy International FCN Filing - May 16, 2007

1. Carrier TRILOGY INTERNATIONAL Number: 425-458-5955 Name: ENTERPRISES, LLC DBA Number: 425-458-5998 Name: Scott.morris@trilogy-155 108th Avenue, NE Street: E-Mail: international.com Suite 400 City: Bellevue WA State: Country: USA Zipcode: 98004 -Attention: Mr. Scott Morris 2. Contact

Name:	Eric Fishman, Esq.	Phone Number:	202-828-1849				
Compan	y: Holland & Knight LLP	Fax Number:	202-955-5564				
Street:	2099 Pennsylvania Ave., NW	E-Mail:	Eric.Fishman@hklaw.com				
	Suite 100						
City:	Washington	State:	DC				
Country:	USA	Zipcode:	20006 -1816				
Attention	Attention: Eric Fishman Relationship: Legal Counsel						
3. Place of Incorporation of Carrier Delaware							
4. Other Company(ies) and Place(s) of Incorporation incorporated in the British Virgin Islands All America Cables and Radio - Dominican Republic is							
5. Country or Countries for which carrier is notifying the Commission of an affiliation. Dominican Republic							
6. Is there an accompanying Transfer of Control or Assignment Application pursuant to Section 63.18(e)(3) of the Rules, 47 C.F.R. §63.18(e)(3), to this foreign carrier affiliation notification? • Ves							
7. If the answer to question 6 is yes, please provide the date of filing of the Transfer of Control or Assignment Application.							
8. Is this foreign carrier affiliation notification being filed as a prior notification pursuant to Section 63.11(a) or as a post notification pursuant to Section 63.11(b)-(c)? Prior Post							
9. If this foreign carrier affiliation notification is being filed as a prior notification pursuant to Section 63.11(a)(1) or (2) of the Rules, 47 C.F.R. §§63.11(a)(1) or (2), is this filing being made at least forty-five days prior to the consummation of the acquisition? If the answer to this question is no, include in an Attachment (use Attachment 1 below) a statement explaining the reason for non-compliance with the Section 63.11(a) filing requirement.							
10. If this foreign carrier affiliation notification is being filed as a post notification pursuant to Section 63.11(b)-(c) of the Rules, 47 C.F.R. §63.11(b)-(c), is this filing being made within thirty days after consummation of the acquisition? If the answer to this question is no, include in an Attachment (use Attachment 1 below) a statement explaining the reason for noncompliance with the Section 63.11(c) filing requirement.							
11. If the foreign carrier affiliation notification is being filed as a post notification pursuant to Section 63.11(c) of the Rules, 47 C.F.R. §63.11(c), are you relying upon an exception in Section 63.11(b)?  • Yes • No • N/A							
12. If the answer to question 11 is yes, please certify to one or more of the following questions as applicable for each carrier and destination market for which notification is being made (see Section 63.11(b)):							
fo ne to	as the Commission previously determined in this preign carrier(s) lacks market power in this filing? If the answer is you the decision(s) in an Attachment (use	any destinations, please prov Attachment 1	on market being vide the citation(s) $\circ$ Yes $\circ$ No below).	O <sub>N/A</sub>			
bo of de	oes the foreign carrier(s) own facilities eing notified in this filing (see Section f "facilities")? If the answer is yes, pleat estination market(s) being notified in the ttachment 1 below).	63.11(b)(1)(ii) ase specify the	) for a definition e carrier(s) and $\circ_{Yes} \circ_{No}$	O <sub>N/A</sub>			
c. Is	the foreign carrier authorized to opera	nte in a WTO	Member?				

1. If the foreign carrier is authorized to operate in a WTO Member, is the authorized carrier making this filing demonstrating that it is entitled to retain non-dominant classification on the newly affiliated route pursuant to Section 63.10 of the Rules, 47 C.F.R. §63.10? If so, please provide the necessary demonstration in an Attachment (use Attachment 1 below).						
2. If the foreign carrier is authorized to operate in a WTO Member, is the authorized carrier agreeing to comply with the dominant carrier safeguards contained in Section 63.10 of the Rules, 47 C.F.R. §63.10, effective upon the acquisition of the affiliation?						
13. If the foreign carrier affiliation notification is being filed as a prior notification pursuant to Section 63.11(a) of the Rules, 47 C.F.R. §63.11(a), is the foreign carrier authorized to operate in a non-WTO Member country?						
14. If the answer to question 13 is yes, is the authorized carrier making the required showing that the foreign carrier lacks market power in the non-WTO Member country (see Section 63.18 (k)(2), 47 C.F.R. §63.18(k)(2)) or, alternatively, the Effective Competitive Opportunities showing specified in Section 63.18(k)(3) of the Rules, 47 C.F.R. §63.18(k)(3)? If yes, please provide the supporting information in an Attachment (use Attachment 1 below).						
15. If the answer to question 13 is yes and the answer to question 14 is no, you may provide information in an Attachment (use Attachment 1 below) to demonstrate it continues to serve the public interest for you to operate on the route for which you propose to acquire an affiliation with the non-WTO foreign carrier. (See Section 63.11(g)(2)).						
16. Regardless of whether the foreign carrier affiliation notification is filed as a prior or post notification, does the authorized carrier request continued regulation as a non-dominant international carrier pursuant to Section 63.10 of the Rules, 47 C.F.R. §63.10? If yes, include an Attachment (use Attachment 1 below) stating how the carrier qualifies for non-dominant classification pursuant to this section.						
17. Regardless of whether the foreign carrier affiliation notification is filed as a prior or post notification, provide in an Attachment (use Attachment 1 below) the name of the newly affiliated foreign carrier(s) and the country or countries in which it is authorized to provide telecommunications services to the public.						
18. Regardless of whether the foreign carrier affiliation notification is filed as a prior or post notification, state in an Attachment (use Attachment 1 below) what services the authorized carrier(s) making this filing is authorized to provide to each country named in response to question 17 and the FCC file numbers under which each such authorization was granted.						
19. Regardless of whether the foreign carrier affiliation notification is filed as a prior or post notification, state in an Attachment (use Attachment 1 below) which, if any, of the countries the authorized carrier making this filing serves solely through the resale of international switched services of unaffiliated U.S. facilities-based carriers.						
20. Regardless of whether the foreign carrier affiliation notification is filed as a prior or post notification, provide in an Attachment (use Attachment 1 below) the name, address, citizenship and principal business of any person or entity that directly or indirectly owns at least ten percent of the equity of the authorized carrier making this filing, and the percentage of equity owned by each of those entities to the nearest one percent.						
21. Regardless of whether the foreign carrier affiliation notification is filed as a prior or post notification, provide the name of any interlocking directorates, as defined in Section 63.09(g) of the Rules, 47 C.F.R. §63.09(g), with each foreign carrier named in the notification.						
22. By checking Yes, the carrier certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where $\mathbf{O}_{\mathbf{Yes}}$ the foreign carrier possesses market power on the foreign end of the route.						
23. By checking Yes, the carrier certifies that it shall maintain the continuing accuracy of information provided pursuant to Section 63.11 of the Rules, 47 C.F.R. §63.11, for a period of of Yes forty-five days after the filing of this form. In addition, the applicant certifies that it shall immediately inform the Commission if at any time, not limited to forty-five days, the						

representations in the "special concessions" certification referenced in question 22 are no longer accurate.

### **CERTIFICATION**

24. Typed Name of Person Signing Scott Morris		25. Title of Person Signing General Counsel					
WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT  (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).							
26, 1: Attachment 1 2:	Attachment	3: Attachment					

### FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

The public reporting for this collection of information is estimated to average 1 - 6,056 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0686), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to jboley@fcc.gov. PLEASE DO NOT SEND YOUR RESPONSE TO THIS ADDRESS.

Remember - You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0686.

THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

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#### Attachment 1

Item 10. Pursuant to a Stock Purchase Agreement, on March 17, 2007 Trilogy International Dominican Republic LLC ("Trilogy-DR"), an affiliate of Trilogy International Enterprises LLC ("Trilogy") (formerly known as Western Wireless International Enterprises, Inc.), acquired all of the stock of All America Cables and Radio, Inc. ("AACR") from Centennial Dominican Republic Holding Company Corp., a wholly-owned subsidiary of Centennial Communications Corp. AACR owns all of the stock of All America Cables and Radio – Dominican Republic ("AACR-DR"), which provides wireless and local broadband services in the Dominican Republic. Due to an inadvertent error, Trilogy did not realize that the 30 day deadline for filing the instant foreign carrier affiliation notification had passed until early in May. In view of this relatively brief delay, and the efforts of Trilogy to rectify this error as soon as possible after it came to light, Trilogy respectfully requests the Commission to grant a waiver of Section 63.11 of the rules to allow this late filing.

Items 12 and 16. Trilogy respectfully submits that it should retain non-dominant status pursuant to Section 63.10 of the Commission's rules because AACR-DR lacks fifty percent (50%) of the market share in the international transport and local access markets in the Dominican Republic end of the route between the U.S. and the Dominican Republic. Moreover, the Dominican Republic is a member of the World Trade Organization, and AACR-DR does not appear on the Commission's list of foreign telecommunications carriers presumed to possess market power in foreign telecommunications markets.<sup>1</sup>

<u>Item 17</u>. All America Cables and Radio – Dominican Republic is authorized to provide public telecommunications service in the Dominican Republic.

<u>Item 18</u>: Trilogy International Enterprises LLC (formerly known as Western Wireless International Enterprises, Inc.) holds international operating authority under Section 214 of the Communications Act of 1934, as amended, to provide global facilities-based and resold telecommunications service. See File No. ITC-214-20021021-00502 and ITC-T/C-20060201-00084.

<u>Item 19</u>. Trilogy International Enterprises LLC does not currently provide service to any country solely through the resale of international switched services of unaffiliated U.S. facilities-based carriers.

<u>Item 20</u>. Trilogy International Enterprises LLC is a wholly-owned subsidiary of Trilogy International Partners LLC, a limited liability holding company organized under the laws of the State of Washington. The address of Trilogy International Partners is 155 108<sup>th</sup> Avenue, NE, Suite 400, Bellevue, Washington 98004.

<u>Item 21.</u> Brad Horwitz is a director of Trilogy International Enterprises and AACR.

See International Bureau Revised and Reissues the Commission's List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets, Public Notice, DA 07-233, released January 26, 2007.



## **PUBLIC NOTICE**

FEDERAL COMMUNICATIONS COMMISSION 445 12th STREET S.W. WASHINGTON D.C. 20554

News media information 202-418-0500 Fax-On-Demand 202-418-2830; Internet: http://www.fcc.gov (or ftp.fcc.gov) TTY (202) 418-2555

DA No. 08-2095

Report No. FCN-00104

Monday September 15, 2008

#### FOREIGN CARRIER AFFILIATION NOTIFICATION

Pursuant to the Commission's rules, the U.S. international carriers and submarine cable landing licensees listed below filed with the Commission a notification of the affiliation they have or propose to have with foreign carriers. These notifications are filed pursuant to Sections 63.11 and 1.768 of the Commission's rules, 47 C.F.R. Sections 63.11 and 1.768.

The Commission amended Section 63.11 in IB Docket No. 97-142, Rules and Policies on Foreign Participation in the U.S. Telecommunications Market, 15 FCC Rcd. 18158 (2000). The Commission recently adopted Section 1.768 in IB Docket No. 00-106, Review of Commission Consideration of Applications under the Cable Landing License Act, 16 FCC Rcd. 22167 (2001).

FCN-NEW-20060206-00032

Verizon Hawaii International Inc.

Notification

Pursuant to Section 1.768 of the Commission's rules, Verizon Hawaii International, Inc. hereby notifies the Commission of its foreign affiliation with carriers in the following countries: Argentina, Australia, Austria, Belgium, Botswana, Canada, Chile, Columbia, Czech Republic, Denmark, Finland, France, Germany, Greece, Hong Kong, Hungary, Ireland, Italy, Japan, Kenya, Korea, Luxembourg, Namibia, Netherlands, New Zealand, Norway, Panama, Peru, Poland, Portugal, Russia, Singapore, South Africa, Spain, Sweden, Switzerland, Taiwan ROC, United Kingdom, Venezuela, and Zambia.

FCN-NEW-20070205-00017

BorderCOMM Partners

Notification

Pursuant to Section 63.11 of the Commission's Rules, BorderCOMM Partners LP hereby notifies the Commission of their affiliation with Technologia Comunicaciones Avanzadas S.A. de C.V. (TCA) in Mexico.

FCN-NEW-20070417-00040

IPC Systems, Inc.

Notification

Pursuant to Section 63.11 of the Commission's Rules, IPC Systems, Inc. hereby notifies the Commission of their affiliation with IPC Network Services Japan KK in Japan.

Other Companies:

FCN-NEW-20070516-00041

TRILOGY INTERNATIONAL ENTERPRISES, LLC

Notification

Pursuant to Section 63.11 of the Commission's Rules, Trilogy International Enterprises, LLC hereby notifies the Commission of its affiliation with All America Cables and Radio - Dominican Republic, in the Dominican Republic.

Other Companies:

FCN-NEW-20070621-00042

Global Caribbean Network

Notification

Pursuant to Section 63.11 of the Commission's Rules, Global Caribbean Network hereby notifies the Commission of its affiliation with the following foreign carriers: Middle Caribbean Network, S.A.S in Dominica, Guadeloupe, and Martinique; Southern Caribbean Fiber, S.A.S in Antigua, Barbados, Martinique, St. Vincent and the Grenadines, Grenada, St. Kitts, St. Lucia, and Trinidad; Tele(Barbados) Inc. in Barbados; Antilles Crossing (St. Lucia), Limited in St. Lucia; and Antilles Crossing, LP in Barbados.

Other Companies:

FCN-NEW-20070621-00043

n

Antilles Crossing-St. Croix, Inc.

Notification

Pursuant to Section 1.768 of the Commission's Rules, Antilles Crossing-St. Croix, Inc. hereby notifies the Commission of the foreign carrier affiliation with Middle Caribbean Network, S.A.S and Southern Caribbean Fiber, S.A.S in Barbados and St. Lucia.

FCN-NEW-20070815-00044

Ε

TeliaSonera International Carrier, Inc.

Notification

Pursuant to Section 63.11 of the Commission's Rules, TeliaSonera International Carrier, Inc. hereby notifies the Commission of its affiliation with Coscom LLC in Uzbekistan.

FCN-NEW-20070815-00045

E

TeliaSonera International Carrier, Inc.

Notification

Pursuant to Section 63.11 of the Commission's Rules, TeliaSonera International Carrier, Inc. hereby notifies the Commission of its affiliation with CJSC Indigo-Tajikistan and CJSC Joint Ventures Somoncom in Tajikistan.

FCN-NEW-20070920-00046

E

Telefonica USA, Inc.

Notification

Pursuant to Section 63.11 of the Commission's Rules, Telefonica USA, Inc. hereby notifies the Commission of their affiliation with Rey Morena, S.A., Telefonica Data Colombia, S.A., Telefonica Moviles Colombia, S.A., and Columbia Telecomunicaciones S.A. ESP in Colombia and Telefonica O2 Czech Republic, a.s., in Czech Republic.

Telefonica USA, Inc. agrees to be classified as a dominant carrier on the U.S.-Colombia and U.S.-Czech Republic routes and to comply with the dominant carrier safeguards contained in Section 63.10 of the Commission's rules, 47 C.F.R. § 63.10. Telefonica USA, Inc. is also classified as a dominant carrier on the U.S.-Argentina, U.S.-Chile, U.S.-Peru, and U.S.-Spain routes.

For further information concerning this matter, please contact JoAnn Sutton, Policy Division, International Bureau, (202) 418-1460; TTY: 418-2555.

Unless otherwised specified, interested parties may file comments with respect to these notifications within 14 days of the date of this public notice (see Section 1.4(b)(4)). The notifying carrier may respond within 10 days after any such pleadings are filed, and the parties that filed such pleadings may reply within 5 days. See Section 63.52(c), 1.45(c)-(j). It is requested that such comments refer to the notification file number shown above. A copy of the notification is available for public inspection in the Reference Information Center, Court Yard Level, 445 12th Street, S.W., Washington, D.C. 20554. People with Disabilities: To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (voice), 202-418-0432 (tty).

ITC-T/C-20060201-00084 E

Western Wireless International Enterprise, Inc.

Transfer of Control

Grant of Authority Date of Action: 03/10/2006

Current Licensee: Western Wireless International Enterprise, Inc.

FROM: Western Wireless, LLC

#### TO: TRILOGY INTERNATIONAL PARTNERS LLC

Application for consent to transfer control of international section 214 authorization to provide global facilities-based and resale service, ITC-214-20021021-00502, held by Western Wireless International Enterprise, Inc. ("WWIE") from its parent, Western Wireless, LLC ("Western Wireless") to Trilogy International Partners LLC ("Trilogy"). Western Wireless is a wholly-owned subsidiary of ALLTEL Communications, Inc. ("ALLTEL"). Pursuant to the terms of certain stock purchase agreements between ALLTEL and Trilogy, ALLTEL has agreed to sell to Trilogy the issued and outstanding common stock of WWIE. Trilogy is a limited liability company organized under the laws of the State of Washington. Its sole members are John Stanton and his wife, Theresa Gillespie, each of whom is a U.S. citizen and owns a 50% ownership interest in Trilogy. This authorization is without prejudice to the Commission's action on any other related pending application(s).

#### **Dismissal**

ITC-214-20030812-00398

XANTIC B.V.

By letter dated March 8, 2006, Applicant notified the Commission of the withdrawal of its international section 214 application.



## **PUBLIC NOTICE**

FEDERAL COMMUNICATIONS COMMISSION 445 12th STREET S.W. WASHINGTON D.C. 20554

News media information 202-418-0500 Fax-On-Demand 202-418-2830; Internet: http://www.fcc.gov (or ftp.fcc.gov) TTY (202) 418-2555

DA No.

03-470

Report No. TEL-00638

Thursday February 20, 2003

#### INTERNATIONAL AUTHORIZATIONS GRANTED

Section 214 Applications (47 C.F.R. § 63.18); Cable Landing License Applications (47 C.F.R. § 1.767); Requests to Authorize Switched Services over Private Lines (47 C.F.R. § 63.16); Section 310(b)(4) Requests

The following applications have been granted pursuant to the Commission's streamlined processing procedures set forth in Section 63.12 of the Commission's rules, 47 C.F.R. § 63.12, other provisions of the Commission's rules, or procedures set forth in an earlier public notice listing applications accepted for filing.

Unless otherwise noted, these grants authorize the applicants (1) to become a facilities-based international common carrier subject to 47 C.F.R. § 63.22; and/or (2) to become a resale-based international common carrier subject to 47 C.F.R. § 63.23; or (3) to exceed the 25 percent foreign ownership benchmark applicable to common carrier radio licensees under 47 U.S.C. § 310(b)(4). Grants under Section 63.16 and certain grants under Section 63.18 also authorize carriers generally to use their authorized private lines to provide switched services (ISR) between the United States and particular international points pursuant to 47 C.F.R. § 63.16. See also 47 C.F.R. §§ 63.22(e), 63.23(d).

This public notice serves as each newly authorized carrier's Section 214 certificate. It contains general and specific conditions, which are set forth below. Newly authorized carriers should carefully review the terms and conditions of their authorizations. These are set forth in detail below and in Sections 63.21, 63.22, and 63.23 of the Commission's rules, 47 C.F.R. §§ 63.21-.23. Failure to comply with general or specific conditions of an authorization, or with other relevant Commission rules and policies, could result in fines and forfeitures.

The Commission most recently amended its rules applicable to international telecommunications common carriers in 2000 Biennial Regulatory Review, Policy and Rules Concerning the International, Interexchange Marketplace, FCC 01-93, released, March 20, 2001, 66 Fed. Reg. 16874 (Mar. 28, 2001). See also IB Docket No. 97-142, Rules and Policies on Foreign Participation in the U.S. Telecommunications Market, Order on Reconsideration, 15 FCC Rcd 18158 (2000); IB Docket No. 98-118, Review of International Common Carrier Regulations, FCC 99-51, released March 23, 1999, 64 Fed. Reg. 19,057 (Apr. 19, 1999) and in IB Docket Nos. 98-148, 95-22, CC Docket No. 90-337 (Phase II), 1998 Biennial Regulatory Review - Reform of the International Settlements Policy and Associated Filing Requirements, FCC 99-73, released May 6, 1999, 64 Fed. Reg. 34, 734 (June 29, 1999). An updated version of Sections 63.09–.24 of the rules, and other related sections, is available at http://www.fcc.gov/ib/td/pf/telecomrules.html.

ITC-214-20021008-00486 E

Royal Phone Company LLC

International Telecommunications Certificate

Service(s):

Global or Limited Global Facilities-Based AND Resale Service

Grant of Authority

Date of Action: 02/14/2003

Application for authority to operate as a facilities-based carrier in accordance with the provisions of Section 63.18(e)(1) of the rules and also to provide service in accordance with the provisions of Sections 63.18(e)(2) of the rules.

ITC-214-20021021-00502 E

Western Wireless International Enterprise, Inc.

International Telecommunications Certificate

Service(s):

Global or Limited Global Facilities-Based Service, Global or Limited Global Resale Service

Grant of Authority

Date of Action:

02/14/2003

Application for Authority to operate as a facilities based carrier in accordance with the provisions of Section 63.18(e)(1) of the rules, and also to provide service in accordance with the provisions of Section 63.18(e)(2) of the rules.

ITC-214-20030116-00020 E

Kolk Group, Inc.

International Telecommunications Certificate

Service(s):

Global or Limited Global Facilities-Based Service, Global or Limited Global Resale Service

Grant of Authority

Date of Action: 02/14/2003

Application for authority to operate as a facilities based carrier in accordance with the provisions of Section 63.18(e)(1) of the rules, and also to provide service in accordance with the provisions of Section 63.18(e)(2) of the rules.

ITC-214-20030117-00019 E

Galaxy Communications Corp.

International Telecommunications Certificate

Service(s):

Global or Limited Global Facilities-Based Service, Global or Limited Global Resale Service

Grant of Authority

Date of Action:

02/14/2003

Application for authority to operate as a facilities-based carrier in accordance with the provisions of Section 63.18(e)(1) of the rules and also to provide service in accordance with the provisions of Section 63.18(e)(2) of the rules.

ITC-214-20030117-00021 E

Dialnet

International Telecommunications Certificate

Service(s):

Global or Limited Global Facilities-Based Service, Global or Limited Global Resale Service

Grant of Authority

Date of Action: 02/14/2003

Application for authority to operate as a facilities based carrier in accordance with the provisions of Section 63.18(e)(1) of the rules, and also to provide service in accordance with the provisions of Section 63.18(e)(2) of the rules.

ITC-214-20030124-00031 E

NEWCOM NETWORK CORP.

International Telecommunications Certificate

Service(s):

Global or Limited Global Facilities-Based AND Resale Service

Grant of Authority

Date of Action: 02/14/2003

Application for authority to operate as a facilities-based carrier in accordance with Section 63.18(e)(1) of the rules and also to provide service in accordance with Section 63.18(e)(2) of the rules.

ITC-T/C-20021226-00607 P

Evercom Systems, Inc.

Transfer of Control

Service(s):

Transfer of Control

Grant of Authority

Date of Action: 02/14/2003

Current Licensee: Evercom Systems, Inc.

FROM: Evercom, Inc.

EI Merger Holdings, Inc.

Application to transfer control of an international section 214 authorization, ITC-214-19991115-00713, held by Evercom Systems, Inc. from Evercom, Inc. to EI Merger Holdings, Inc.

#### Joann Ekblad

From: eric.fishman@hklaw.com

Sent: Tuesday, August 14, 2007 3:35 PM

To: Joann Ekblad

Subject: RE: Trilogy International FCN Filing 5-16-07.pdf

Joann,

Thank you again for your kind thoughts.

The information you need is as follows:

Name and Address of 100% Equity Owner of Trilogy International Enterprises, LLC:

Trilogy International Partners, LLC 155 108th Avenue, NE Suite 400 Bellevue, Washington 98004

Citizenship: US (Delaware Limited Liability Company)

Principal Business: Holding Company

Equity Interest: 100%

If you need any further information, please let me know.

Best wishes and thanks,

Eric Fishman

## Holland + Knight

#### Eric Fishman, Esq.

Partner
Holland & Knight LLP
2099 Pennsylvania Avenue, NW
Washington, DC 20006
Main 202-955-3000
Direct 202-828-1849

Fax 202-955-5564

Email eric.fishman@hklaw.com

www.hklaw.com

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From: Joann Ekblad [mailto:Joann.Ekblad@fcc.gov]

Sent: Tuesday, August 14, 2007 3:27 PM

To: Fishman, Eric (WAS - X71849)

Subject: RE: Trilogy International FCN Filing 5-16-07.pdf

Eric.

Thank you for getting back to me. My condolence to you and your family.

Basically, I need the specific ownership information of the applicant as requested in question #20, i.e., name, address, citizenship, etc. In this case is that of the parent company.

If you'd like to e-mail me this additional information, I will be glad to upload your e-mail into IBFS as part of your application.

I can be reached at (202) 418-1372 if you have any questions.

Thank you,

JoAnn

From: eric.fishman@hklaw.com [mailto:eric.fishman@hklaw.com]

Sent: Tuesday, August 14, 2007 12:59 PM

To: Joann Ekblad

**Subject:** Trilogy International FCN Filing 5-16-07.pdf

Joann,

Thank you so much for your kind voice mail, and for your understanding in the wake of my wife's untimely death. As you can imagine, this has been a difficult time for me and my family, and your sensitivity is greatly appreciated.

In your previous voice mail to me you had indicated that you needed information responsive to Item 20 of the Foreign Carrier Affiliation Notification form. I believe, however, that the attachment to the form contains the information you were seeking. If you need any further information on this (such as ownership on the parent of the filer), please let me know.

Best wishes,

Eric Fishman

### Holland + Knight

Eric Fishman, Esq.

Partner Holland & Knight LLP 2099 Pennsylvania Avenue, NW Washington, DC 20006 Main 202-955-3000 Direct 202-828-1849 Fax 202-955-5564

Email eric.fishman@hklaw.com

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Eric Fishman 202 828 1849 eric.fishman@hklaw.com

November 9, 2007

### VIA HAND DELIVERY

Ms. Joanne Ekblad, Assistant Division Chief Mr. David Krech, Assistant Division Chief International Bureau Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re:

Trilogy International Enterprises, LLC Foreign Carrier Affiliation Notification File No. FCN-NEW-20070516-00041

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Federal Communications Commission Bureau / Office

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Policy Division International Bureau

Dear Ms Ekblad and Mr. Krech:

This letter responds to your recent inquiry regarding the ownership of Trilogy International Partners, LLC ("TIP"), the parent of Trilogy International Enterprises, LLC.

As set forth in the above-captioned Foreign Carrier Affiliation Notification, TIP is a limited liability holding company organized under the laws of the State of Washington. The address of TIP is 155 108<sup>th</sup> Avenue, NE, Suite 400, Bellevue, Washington, 98044.

The only investors who own a 10% or greater equity interest in TIP are John Stanton and his wife, Theresa Gillespie, who jointly own 48% of the outstanding membership units of the company. Because Mr. Stanton and his wife own a senior class of unit, their voting percentage – 63.5% -- is higher than their equity percentage. Mr. Stanton and his wife are both U.S. citizens, and their address is 155 108<sup>th</sup> Street, NE, Suite 400, Bellevue, Washington 98044.

One other investor in TIP has voting power (but not equity ownership) in excess of 10%. Jean-Claude Flambert, a Haitian resident, has a 12.4% voting interest in TIP, and a 7.6% equity interest. Mr. Flambert's is 52 Boulevard, Jean Jacques Dessalines, Pont Rouge, Haiti (West Indies).

Should you need any further information concerning this matter, please feel free to contact the undersigned directly.

Respectfully submitted,,

Eric Fishman

Attorney for Trilogy International Enterprises, LLC

cc: Howard Griboff Susan O'Connell



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