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NOV - 9 2006

Federal Communications Commission
Office of the Secretary

November 9, 2006

via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: AST Telecom, LLC
Petition for Declaratory Ruling
ISP-PDR-20061004-00014**

Dear Ms. Dortch:

The following information is being submitted in response to an International Bureau staff request for additional information/clarification in connection with the above referenced Petition for Declaratory Ruling:

1. **Please certify that AST Telecom is in compliance with its existing ruling (see ISP-PDR-20050810-00009, DA 05-2416, rel. Sept. 8, 2005).**

Attached is the Declaration of Harley L. Rollins, III, Chief Financial Officer of eLandia, Inc., the parent company of AST Telecom, LLC, certifying that eLandia and AST Telecom, LLC remain in compliance with its existing ruling.

2. **Please explain the current status of the ownership interest of the "Datec Shareholders" in eLandia, Inc. and AST Telecom. Please describe the escrow and when and how the shares will be released from escrow. Also confirm who has the rights to vote those shares while they are in escrow.**

Pursuant to the Commission's ruling in ISP-PDR-20050810-00009, DA 05-2416, rel. Sept. 8, 2005, the shareholders of Datec Group, Ltd., a Province of New Brunswick corporation, acquired a 30.5% interest in eLandia, Inc. (formerly named eLandia Solutions, Inc.), the parent of the applicant AST Telecom, LLC. Those shares in eLandia have been and continue to be held in escrow. The escrow is set up for trading purposes only and not for voting purposes. While the shares may not be traded until released from escrow, the escrowed shares are voted by the individual shareholders. Under the terms of the escrow, the shares will be released to the individual Datec shareholders on a quarterly basis beginning February, 1 2007 and ending February 1, 2008. The number of shares to be distributed from the escrow in each quarter is tied

to trading performance of eLandia stock once that stock begins public trading. Currently, no eLandia stock is publicly traded.

3. **Please describe any changes to the ownership of AST Telecom/eLandia for the "Datec Shareholders" (see the FCC Form 603 Exhibit 3 filing titled "Classification of Datec Shareholders") and the "Other Shareholders" subsequent to the filings you made last year. In particular, please explain the holdings of Michael Ah Koy and why he is listed as a ten percent or greater indirect shareholder of AST Telecom in the Form 602 which was filed for Auction 66. (He was not listed as a ten percent or greater shareholder last year.) Also, on the phone you mentioned that at least one shareholder has turned in his/her shares. Please describe any shares that have been turned in and what impact that may have on the ownership percentages of the remaining shareholders.**

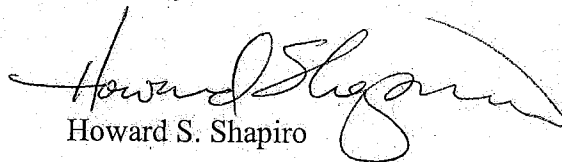
There have been only minor insignificant changes to the ownership of AST Telecom and eLandia since the information submitted to the Commission last year in connection with the existing declaratory ruling. The ownership percentages in eLandia have changed fractionally as a result of the retirement of 303,000 shares previously held by Sidney D. Camper III (one of the individuals included in the "Other Shareholder" category. As a result of this retirement, the percentage of eLandia shares held by the "Datec Shareholders" as a group increased slightly from 30.5% to 31.17%. The percentage held indirectly by Barry and Fay Rose stands at 10.83%; the percentage held indirectly by R. Allen Stanford increased slightly to 43.84%; and the percentage held by the group designated as the Other Shareholders (which included Mr. Camper) was reduced slightly to 14.16%. No individual shareholder included within the Datec Shareholder group or the Other Shareholder group owns a 10% or greater interest in eLandia. Michael Ah Koy individually holds less than 10% of eLandia. Because Michael Ah Koy is part of eLandia management, he is deemed to be a "related party" for SEC reporting purposes and to achieve consistency of reporting, the eLandia shares held by Kelton Investments, a family trust, were added to Mr. Ah Koy's personal shares in preparing the FCC Form 602 that was filed in Auction No. 66. The family trust is beneficially owned by 5 members of the Ah Koy family.

4. **Please confirm the citizenship of (a) Michael Ah Koy, and (b) Krishna Sami.**

Michael Ah Koy and Krishna Sami are both citizens of Fiji.

Please feel free to contact me should you need any additional information.

Sincerely,


Howard S. Shapiro

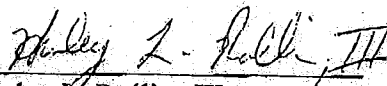
Cc: James Ball, Chief, Policy Division, International Bureau

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DECLARATION OF HARLEY L. ROLLINS, III

I, Harley L. Rollins III, under penalty of perjury do declare that:

- 1). I am Chief Financial Officer eLandia, Inc. ("eLandia");
- 2). ELandia and its wholly-owned subsidiary, AST Telecom, LLC have at all times remained in compliance with the foreign ownership benchmarks established by the Federal Communications Commission in its Declaratory Ruling issued in ISP-PDR-20050810-00009, DA 05-2416 (rel. Sept. 8, 2005). Specifically, the amount of non-Fijian foreign ownership of eLandia, remains under 25% in the aggregate and no single foreign individual or entity, other than Stanford International Bank, Ltd., Stanford International Bank Holdings, Ltd., and R. Allen Stanford, holds an ownership or voting interest in eLandia in excess of 25%.
- 3). I have read the responses to contained in the letter to which this declaration is attached, and such responses are true and correct to the best of my knowledge information and belief.


Harley L. Rollins III

Dated: November 9, 2006



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