

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

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)	
In the Matter of)	
)	ITC-T/C-20140507-00148
)	ISP-PDR-20140502-00002
Telecom North America, Inc.)	ISP-PDR-20131213-00012
and Telecom North America Mobile, Inc.)	
)	
)	
)	

**PETITION TO ADOPT CONDITIONS TO
AUTHORIZATIONS AND LICENSES**

The Department of Justice (“DOJ”) submits this Petition to Adopt Conditions to Authorizations and Licenses (“Petition”), pursuant to Section 1.41 of the Federal Communications Commission (“Commission”) rules.¹ Through this Petition, DOJ advises the Commission that it has no objection to the Commission approving the authority sought in the above-referenced proceedings, provided that the Commission conditions its approval on the assurance of Telecom North America, Inc. to abide by the commitments and undertakings set forth in the November 13, 2014 Letter of Assurances (“LOA”), which is attached hereto. The above-referenced proceedings involves multiple applications filed with the Commission by Telecom North America, Inc. for authority under section 214 of the Communications Act of 1934, as amended, to provide global or limited-global facilities-based and resale services to all international points.

The Commission has long recognized that law enforcement, national security, and public safety concerns are part of its public interest analysis, and has accorded deference to the views of other U.S. government agencies with expertise in those areas. *See In the Matter of Comsat*

¹ 47 C.F.R. § 1.41.

Corporation d/b/a Comsat Mobile Communications, etc., 16 FCC Rcd. 21,661, 21707 ¶ 94 (2001).

After discussions with representatives of Telecom North America, Inc. in connection with the above-referenced proceedings, DOJ has concluded that the additional commitments set forth in the LOA will help ensure that DOJ, a U.S. Government agency with responsibility for enforcing the law, protecting the national security, and preserving public safety, can proceed appropriately to satisfy its responsibilities of enforcing the law, protecting the national security, and preserving public safety. Accordingly, DOJ advises the Commission that it has no objection to the Commission granting the applications in the above-referenced proceedings, provided that the Commission conditions its consent on compliance with the LOA.

Respectfully submitted,

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