

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

In the Matter of
Telecom North America, Inc.
Telecom North America Mobile, Inc.

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File Nos: ITC-T/C-20150501-00117 and
ISP-PDR-20150605-00004

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

The Department of Justice (“DOJ”) (“the Agency”) 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, the Agency 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. (“TNA”), and Telecom North America Mobile, Inc. (“TNA-Mobile”) (collectively, "Petitioners") to abide by the commitments and undertakings set forth in the November 13, 2014 Letter of Assurances (“LOA”), which is attached hereto. In the above-referenced proceedings, TNA and TNA-Mobile request that the Commission approve an increase in ownership of TNA and TNA-Mobile by Knowroaming, Ltd. (“KRL”), a Canadian corporation, from the currently authorized controlling 50 percent stake to 100 percent pursuant to section 310(b)(4) of the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. §

¹ 47 C.F.R. § 1.41.

310(b)(4), and section 1.990(a)(1) of the Commission's rules, 47 C.F.R. § 1.990(a)(1). Petitioners filed the instant petition in connection with their application for consent to the pro forma transfer of control that occurred on April 28, 2015, when KRL increased its controlling ownership stake in TNA to 75 percent, without prior Commission approval.

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

After discussions with representatives of the Applicant in connection with the above referenced proceedings, the Agency has concluded that the additional commitments set forth in the LOA will help ensure that the Agency with responsibility for enforcing the law, protecting the national security, and preserving public safety, can proceed appropriately to satisfy those responsibilities. Accordingly, the Agency advises the Commission that it has no objection to the Commission granting the application in the above-referenced proceedings, provided that the Commission conditions its consent on compliance by TNA, and TNA-Mobile, with the LOA.

Respectfully submitted,

/S/ Richard C. Sofield
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September 30, 2016