

TELECUBA

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MAR 22 2010

FCC Mail Room

March 18, 2010

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APR 12 2010

Policy Division
International Bureau

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12 Street, SW
Washington, D.C. 20554

Re: IConnect Wholesale, Inc. D/B/A Telecuba, Petition For Waiver

Dear Ms. Dortch:

I have enclosed five originals of our Petition for Waiver. I have also enclosed a sixth copy, along with a prepaid self-addressed Fed-Ex envelope so that you may return a copy to us once the Petition is filed with the original stamp.

If you require any changes or need any other material, please do not hesitate to contact me. My direct cell phone is 305-790-8400.

Awaiting your reply.

Sincerely,

Luis G. Coello, President
IConnect Wholesale, Inc.
D/B/A TeleCuba
407 Lincoln Road, Suite 201
Miami Beach, FL 33139
Tel: (305) 790-8400

Encl: Petition For Waiver, five (5) originals and one (1) copy

Before the
FEDERAL COMMUNICATIONS COMMISSION
445 Twelfth Street, S.W.
Washington, D.C. 20554

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Petition for Waiver of the International)
Settlements Policy and Benchmark Rate)
for facilities- based telecommunications)
services with Cuba)

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PETITION FOR WAIVER

ICConnect Wholesale Inc., a Florida Corporation, D/B/A TELECUBA (“TeleCuba”), hereby petitions the Commission for a waiver of the International Settlements Policy (“ISP”) to increase the settlement rate as well as the Benchmark Rate for facilities-based telecommunications services between TeleCuba and its correspondent in Cuba, Empresa de Telecomunicaciones de Cuba S.A. (“ETECSA”).

The Current approved settlement rate with Cuba is US\$0.60, the current Accounting Rate is US\$1.20 per minute and the current Benchmark Rate is US\$0.19. This waiver provides an increase to the current settlement rate with Cuba to US\$0.84 and an increase in the Accounting Rate to US\$1.68 (split 50/50) per minute for a period of three years. The three years is requested because Telecuba estimates that due to the amount of work that is required to establish services, any less of a timeframe may not make economic sense.

In part a of the guidelines released on January 21, 2010 via Public Release DA – 10112 by the Commission, it states that “the Commission should be prepared, to the extent necessary, to grant waivers reasonably limited in duration to enable carriers within its jurisdiction to provide telecommunications service between the United States and Cuba.”¹

¹ See Letter from Ambassador Philip Verveer U.S. Coordinator for International Communications and Information Policy, U.S. Department of State to Julius Genachowski, FCC Chairman, January 12, 2010 via Public Release DA – 10112

Further, Section 1.3 of the Commission's rules permits waiver of any rule for "good cause shown."² A waiver of the proposed settlement and accounting rates is in the public interest. The proposed settlement rate is in the public interest since it would allow TeleCuba the ability to reestablish its working relationship with ETECSA, whereby, allowing for an expansion of telecommunications services between the US and Cuba.

TeleCuba has had ongoing negotiations with ETECSA since 2001 involving the possibility of the laying of a fiber optic cable between the US and Cuba. TeleCuba also secured an International Roaming Service Exchange Agreement with CUBACEL (now a subsidiary of ETECSA) in June of 2000. The abovementioned business could only take place if TeleCuba has the ability to settle payments for telecommunications services at the current requested settlement rate of US\$0.84. Further, TeleCuba's direct satellite telecommunications service ("direct circuit") is in accord with the new Presidential directives from April 13, 2009.³

TeleCuba's reestablishment of its direct circuit to Cuba will provide reduced post dial delay ("PDD") and greatly reduce latency thus improving the call quality. TeleCuba's direct circuit would accomplish this by having only a single "path" to Cuba and would not go the way of the current telecommunications service which is via "third country." Presently these third country providers terminate 100% of the US-Cuba service at a higher cost and lower quality due to operational overhead of the third party carriers and the number of "hops" that the signal must take to reach its final destination. TeleCuba's direct circuit has been a proven alternative to current service, and is necessary to counter the current control possessed by third party carriers which allows them to set authority as they wish, and work with whoever they so choose to.

² 47 C.F.R. § 1.3.

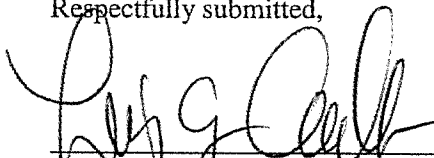
³ See press release from April 13, 2009 from the Office of the Press Secretary on behalf of the White House.

TeleCuba is committed to reactivating its direct service and providing the best service to its customers who are communicating with their friends and relatives in Cuba.

Wherefore, for the reasons set forth herein, TeleCuba respectfully requests that the Commission grants a waiver of the ISP and the Benchmark Rate to allow the settlement rate increase to US\$0.84 and an increase in the Accounting Rate to \$US1.68 per minute for a period of three years to allow the telecommunications services between TeleCuba and ETECSA to begin as soon as possible.

March 15, 2010

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Luis G. Coello', written over a horizontal line.

Luis G. Coello, President
IConnect Wholesale, Inc.
D/B/A TeleCuba
407 Lincoln Road, Suite 201
Miami Beach, FL 33139
Tel: (305) 790-8400

NOTARIZED STATEMENT

I, Luis G. Coello, am the President and CEO of IConnect Wholesale, Inc., a Florida Corporation D/B/A TeleCuba. On behalf of IConnect Wholesale, Inc, in accordance with Section 64.1001(d) of the Commission's Rules, C.F.R. sec64.1001(d), I hereby State:

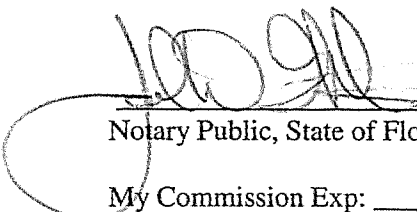
1. IConnect Wholesale Inc. has not bargained for, nor has knowledge of, exclusive availability of the new settlement rate and accounting rate.
2. IConnect Wholesale Inc. has not bargained for, nor has any indication that it will receive, more than its proportionate share of return traffic.
3. IConnect Wholesale Inc. has informed ETECSA, that U.S. Policy requires that competing U.S. carriers have access to settlement and accounting rates negotiated by the filing carrier with the foreign administration on a non-discriminatory basis.

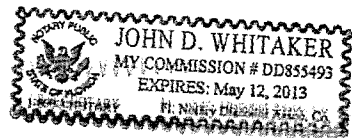


Luis G. Coello
President & CEO
IConnect Wholesale Inc. D/B/A TELECUBA

State of Florida }
 } S.S.
County of Miami-Dade }

Before me, the undersigned authority, personally appeared, Luis G. Coello, personally known to me, and verifies and affirms that he signed the above statement and this petition, freely and voluntarily and that all statements are true and correct. Witness our signatures at Miami, Miami-Dade County, Florida, this 18 day of March, 2010.



Notary Public, State of Florida, at large
My Commission Exp: 5-12-2013

(SEAL)