

December 3, 2015

Via ECFS and IBFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

**Re: International TelCom, Ltd. and SwiftReach Networks, Inc. Joint Application
for Transfer of Control; WC Docket No. 15-297; File No. ITC-T/C-20151126-
00285**

Dear Ms. Dortch:

On behalf of International Telcom, Ltd. ("ITL") and SwiftReach Networks, Inc. ("SNI") (together "Applicants") enclosed herewith for filing is an amendment to Applicant's Joint Application for approval of the transfer of control filed November 26, 2015.

At the request of International Bureau staff, Applicants clarify that the Transferor is Yvette Melendez, an individual, and that the Licensee is "International Telcom Ltd. d/b/a Kallback".

In addition, the Applicants are amending information required by Sections 63.04(a)(4) and 63.18(h) to include additional information regarding the post- transaction ownership of ITL, including a revised pre- and post-transaction ownership chart.

Should you have any questions, please do not hesitate to contact the undersigned.

Respectfully Submitted,



Michael P. Donahue

Counsel for International Telcom, Ltd.

AMENDMENT

Post-Transaction Ownership of Licensee:

The following entity will hold a ten percent (10%) or greater direct interest in **International Telcom, Ltd:**

Name: SwiftReach Networks, Inc.
Address: 14 Industrial Drive, Suite 4
Mahwah, NJ 07430
Citizenship: U.S.
Principal Business: Telecommunications
% Interest: 100%

Current and Post-Transaction Ownership of SwiftReach Networks, Inc.:

The following entity holds a ten percent (10%) or greater direct interest in **SwiftReach Networks, Inc.:**

Name: Afognak Holdings, Inc. ("AHI")
Address: 14 Industrial Drive, Suite 4
Mahwah, NJ 07430
Citizenship: U.S.
Principal Business: Holding Company
% Interest: 100% (directly in SNI)

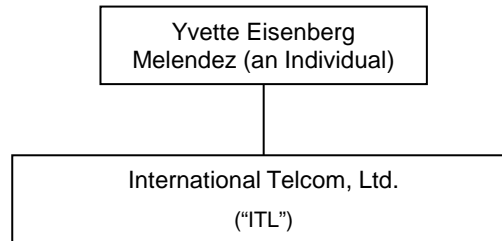
Current and Post-Transaction Ownership of AHI:

Name: Jeffrey Alward
Address: 14 Industrial Drive, Suite 4
Mahwah, NJ 07430
Citizenship: U.S.
Principal Business: Communications
% Interest: 36.5% (directly in AHI)

Name: Alward 2015 Children's Trust
Address: 8 Denison Drive
Saddle River, NJ 07458
Citizenship: U.S.
Principal Business: Trust
% Interest: 36.5% (directly in AHI)

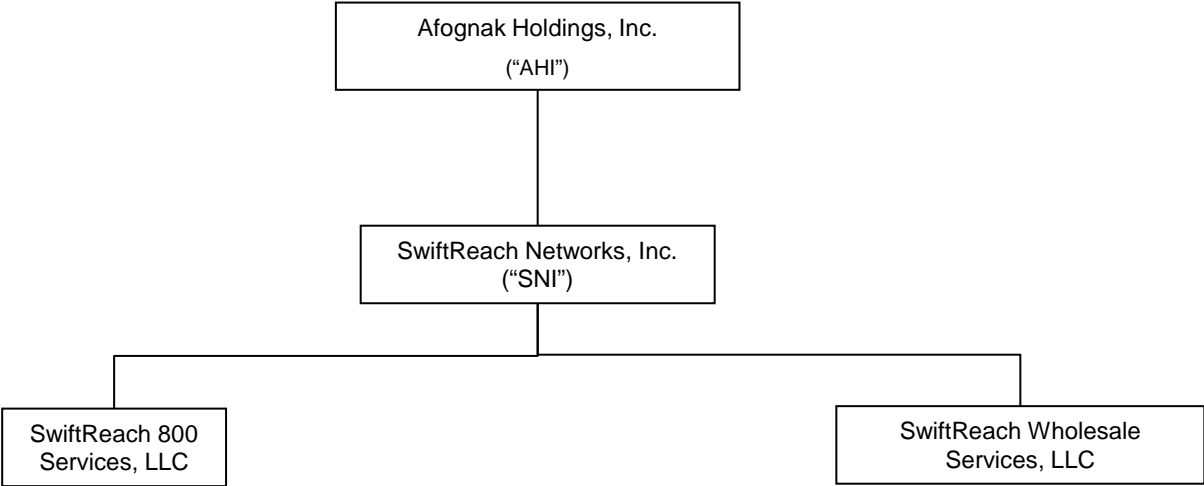
Name: Nick Felmlee
Address: 14 Industrial Drive, Suite 4
Mahwah, NJ 07430
Citizenship: U.S.
Principal Business: Communications
% Interest: 24% (directly in AHI)

Current Corporate Organizational Structure of International Telcom, Ltd.



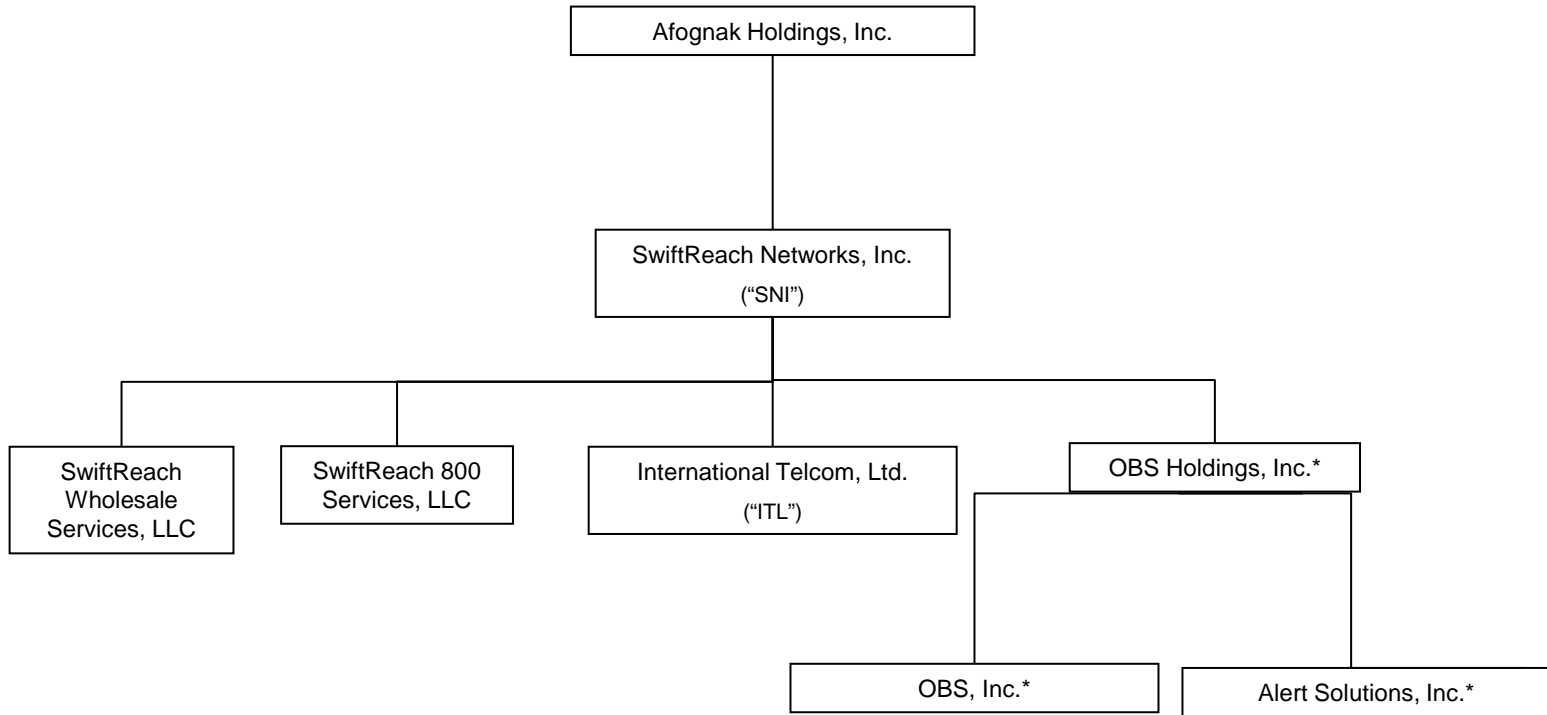
All ownership percentages are 100%.

Current Corporate Organizational Structure of SwiftReach Networks, Inc.



All ownership percentages are 100%.

Post-Closing Corporate Organizational Structure of SwiftReach Networks, Inc. and International Telcom, Ltd.



* These entities will be acquired by SwiftReach Networks, Inc. in an unrelated transaction that is expected to close prior to the acquisition of International Telcom, Ltd.

All ownership percentages are 100%.

Current & Post-Closing Corporate Organizational Structure of AHI

