

ACI LAW GROUP, PC

6 Counterpointe Drive, Suite 630, La Palma, CA90623
Telephone: 714.522.3300 * Facsimile: 714.522.3700 * E-mail: pa@acilawgroup.com
www.acilawgroup.com

September 28, 2018

Mr. Ajit Pai
FCC Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

***KT America, Inc.
Notification of Discontinuance of International Telecommunications
(Prepaid Calling Cards Only)
Authorizations: ITC-98-159; ITC-98-160***

Dear Mr. Pai:

Pursuant to Section 63.19(a) of the Commission's rules, KTA America, Inc. ("KTA"), 811 Wilshire Blvd Suite 1440, Los Angeles, CA 90017, informs the Commission that KTA plans to discontinue its international telecommunications prepaid calling card services for Korea and Latin America.

KTA is a wholly owned subsidiary of KTCorp. ("KTC"), designated by the FCC as a dominant carrier for U.S.-Korea pursuant to 49 U.S.C. 63.10. KTA is also designated by the FCC as a dominant carrier. The FCC issued notice on April 2, 1998, announcing the grant, effective April 1, 1998, of two international section 214 authorizations to KTA to provide international facilities-based service and resale service between (1) the U.S. and the Republic of Korea, subject to the international dominant carrier regulations under 47 CFR sec. 63.10; and (2) the U.S. and all international points, excluding the Republic of Korea. The original File Nos. for these authorizations are ITC-98-160 and ITC-98-159, respectively. In 2006, KTA notified the Commission of a name change to America, Inc. The name change is noted as an "informative" entry in 2006 Actions Taken Public Notice issued on Apr. 13, 2006, which also updated the authorization File Nos. to read ITC-214-19980212-00103 and ITC-214-19980212-00104, respectively.

KTA is engaged in prepaid calling cards services, which, are marketed to Spanish and Korean speaking customers for calling services to the geographical areas of Latin America and Korea. KTA previously used a distributorship model that involved a third party distributor, Kang's Distribution, Inc. ("KDI"), who sold KTA prepaid calling cards on consignment to retail outlets. KTA did not directly sell prepaid cards and prepaid card buyers do not provide their name or address to KTA. During spring 2017, KTA provided several thousand KTA branded cards to KDI on consignment. About June 9, 2017, KDI filed a bankruptcy petition in the Bankruptcy

Court of the Central District of California., Case 8:17-bk-12341-SC. The case is ongoing. The vast majority of prepaid calling cards KTA delivered to KDI in spring 2017 were not sold to retail outlets and have not been recovered.

The geographical areas affected by this notice are Latin America and Korea.

The Authorizations are ITC-98-159 and ITC-98-160.

Beginning October 1, 2018, KTA will begin providing notice to its prepaid calling card customers for Latin America cards via recorded phone message uploaded on its customer service line printed on the back of Latin America cards. The message will be recorded in both Spanish and English notifying customers of the discontinuance of the pre-paid calling card service by October 31, 2018. The recorded message will also provide prepaid calling card customers with information and procedures for KTA customers to request refunds from KTA for unused time through ccservice@ktamerica.com. An English copy of the phone message is attached hereto as is a Spanish translation (Exhibit "1").

Beginning October 1, 2018, KTA will begin providing notice to its prepaid calling card customers for Korea cards via recorded phone message uploaded on its customer service line printed on the back of Korea cards. The message will be recorded in both Korean and English notifying customers of the discontinuance of the pre-paid calling card service by October 31, 2018. The recorded message will also provide prepaid calling card customers with information and procedures for KTA customers to request refunds from KTA for unused time through ccservice@ktamerica.com. An English copy of the phone message is attached hereto as is a Korean translation (Exhibit "2").

KTA requests that the FCC authorize and approve KTA's notice procedure set forth above.

Both KTA and KTC intend to continue to provide all of its other remaining telecommunication services to its customers. The change affecting KTA customers is solely the discontinuance and termination of KTA pre-paid calling cards.

RESPECTFULLY SUBMITTED

Best Regards,
ACI LAW GROUP, PC



John A. Axtell
Admitted in California
john@acilawgroup.com
ja

EXHIBIT “1”

PHONE MESSAGE

To Our Valued Customers,

KT America, Inc. ("KTA") regrets to inform you that because of an unforeseen financial event involving a distributor, KTA is discontinuing its pre-paid calling card service as of October 31, 2018.

By its terms, the KT America pre-paid cards are valid for 90 days from the date of first usage. For all customers with KT America calling cards that still have time remaining on their cards and wish to apply to receive a refund for their unused time prior to expiration, please email our customer service center at ccservice@ktamerica.com and provide your calling card number, authorization code, name for refund processing and contact information.

To apply for a refund for an unused card please email our customer service center and provide your calling card number, authorization code, name and address, and proof of purchase within 1 year of the date of purchase.

KTA sincerely regrets discontinuance of its pre-paid calling card service but will continue to provide all other telecommunications services to its customers with the premium standards that our customers expect from us for all of our telecommunication services.

MENSAJE TELEFÓNICO

A Nuestros Preciados Clientes,

KT America, Inc. ("KTA") lamenta informarle que debido a un evento financiero imprevisto que involucra a un distribuidor, KTA está descontinuoando su servicio de tarjeta para llamadas prepaga desde el 31 de octubre de 2018.

Según sus términos, las tarjetas prepagas de KT America son válidas por 90 días a partir de la fecha de su primer uso. Para todos los clientes con tarjetas de llamadas de KT America que todavía tienen tiempo restante en sus tarjetas y desean solicitar un reembolso por el tiempo no utilizado antes del vencimiento, envíe un correo electrónico a nuestro centro de servicio al cliente a ccservice@ktamerica.com y proporcione su número de tarjeta de llamada, código de autorización, su nombre, para procesar el reembolso, e información de contacto.

Para solicitar un reembolso por una tarjeta no utilizada, envíe un correo electrónico a nuestro centro de servicio al cliente y proporcione su número de tarjeta de llamada, código de autorización, nombre y dirección y comprobante de compra de hasta 1 año de la fecha de la compra.

KTA lamenta sinceramente la discontinuación de su servicio de tarjeta de llamada prepaga, pero continuará brindando todos los demás servicios de telecomunicaciones a sus clientes con los estándares superiores que nuestros clientes esperan de nosotros para todos nuestros servicios de telecomunicaciones.

EXHIBIT “2”

PHONE MESSAGE

To Our Valued Customers,

KT America, Inc. ("KTA") regrets to inform you that because of an unforeseen financial event involving a distributor, KTA is discontinuing its pre-paid calling card service for Korea as of October 31st, 2018.

By its terms, Korean pre-paid cards are valid for 180 days from the date of first usage. For all customers with Hello KT cards or other KTA cards that still have time remaining on their cards and wish to apply to receive a refund for their unused time prior to expiration, please email our customer service center at ccservice@ktamerica.com and provide your calling card number, authorization code, and name for refund processing.

To apply for a refund for an unused card please email our customer service center and provide your calling card number, authorization code, name and address, and proof of purchase within 1 year of the date of purchase.

KTA sincerely regrets discontinuance of its pre-paid calling card service but will continue to provide all other telecommunications services to its customers with the premium standards that our customers expect from us for all of our telecommunication services.

PHONE MESSAGE

안녕하세요.콜링카드를사용하시는고객님들께안내드립니다.

한국콜링카드서비스가회사사정상 2018 년 10 월 31 일을마지막으로아쉽게도종료하게되었습니다.

자사의콜링카드는최초사용날짜부터 180 일간유효합니다.현재사용중인카드의남은발란스에대해환불을원하실경우카드유효기간내에고객센터메일주소 (ccservice@ktamerica.com)로콜링카드번호,콜링카드비밀번호,성함그리고연락처를송부해주시기바랍니다.

구매후사용전인카드의환불을원하실경우,고객센터메일주소로콜링카드번호,콜링카드비밀번호,성함,주소및 1 년내구매증빙(영수증등)서류를송부해주시기바랍니다.

그동안자사의콜링카드서비스를이용해주신고객님들께감사드립니다.