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June 21, 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W., TW-A325
Washington, D.C. 20024

Re: Notice of *Pro Forma* Transfer Involving PF.Net Network Services Corp.
(ITC-214-20000503-00258)

Dear Ms. Dortch:

Pursuant to Sections 63.24(a)(4) and (b) of the Commission's Rules, 47 C.F.R. §§ 63.24(a)(4) and (b), PF.Net Network Services Corp. ("PF.Net"), by its undersigned counsel, notifies the Commission of the *pro forma* transfer and assignment of the above-referenced international Section 214 authorization from PF.Net to PF.Net as a Debtor-In-Possession.

On May 30, 2002, PF.Net, along with its ultimate parent corporation, Velocita Corp., and ten other affiliated companies, filed a voluntary petition for relief in the United States Bankruptcy Court for the District of New Jersey under Chapter 11 of Title 11 of the United States Code. *In re Velocita Corp., et al.*, Chap. 11, Jointly Administered under Case No. 02-35895 (Bankr. D. N.J.). Velocita Corp. does not hold Section 214 authority, nor do any of its subsidiary companies, except for PF.Net.

As Debtor-in-Possession, PF.Net will retain possession of its property and businesses while reorganizing. There have been no changes in the directors, officers, management or shareholders of PF.Net as a result of the Chapter 11 petition. Accordingly, there has been no change in *de facto* control, and PF.Net does not believe that the transfer of control or assignment

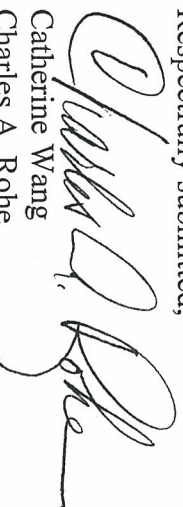
is substantial, within the meaning of Section 63.24 of the Commission's Rules.¹ PF.Net has certified that any transfer of control or assignment that has occurred as a result of its Chapter 11 petition is *pro forma* pursuant to 47 C.F.R. § 63.24(a) and that its Chapter 11 petition does not change the actual control of PF.Net. A certification to that effect is attached as *Exhibit A*.

PF.Net, as Debtor-in-Possession, is owned 100% by PF.Net Corp., which is owned 100% by Velocita Corp. The company's name, address and contact information are as follows:

PF.Net Network Services Corp. (DIP)
2941 Fairview Park Drive, Suite 200
Falls Church, VA 22042
Attn: Yvonne Estime, Senior Corporate Counsel

An original and one (1) copy of this letter are enclosed for filing. Please date-stamp the enclosed extra copy, and return it to the undersigned. Please do not hesitate to contact us if you have any questions in regard to this matter.

Respectfully submitted,



Catherine Wang
Charles A. Rohe

Counsel for PF.Net Network Services Corp.
(Debtor-in-Possession)

¹ See, also, *In re 2000 Biennial Regulatory Review, Amendment of Parts 43 and 63 of the Commission's Rules*, IB Docket No. 00-231, FCC 02-154, Report and Order (rel. June 10, 2002), ¶ 6.

CERTIFICATION

On behalf of PF.Net Network Services Corp. (Debtor-in-Possession), I hereby certify that the statements made in the foregoing notification letter are true, complete and correct to the best of my knowledge and are made in good faith. Specifically, I certify that the above-described transfer of control and assignment are *pro forma* under Section 63.24(a) of the Commission's Rules, 47 C.F.R. § 63.24(a), and, together with all other *previous pro forma* transactions, do not change the actual controlling party of the above-named corporation.

By: 
Name: Thomas Estire
Title: Senior Corporate Counsel
Date: June 21, 2012

