Voice: (202) 537-1500 Fax: (202) 244-2628

November 28, 2005

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Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary c/o Natek, Inc. 236 Massachusetts Avenue, N.E. - #110 Washington, DC 20002

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Policy Division International Bureau

Federal Communications Commission
Office of Secretary

Re:

Notice of Commencement of Service Under License and Receipt of OFAC License Authorizing Settlement Payments to Cuban Telecommunications Carrier;

Allied Communications – ITC-214-2003001121000528

Dear Ms. Dortch:

On behalf of Allied Communications International, Inc. (ACI), and pursuant to the Commission's Order in the above-captioned matter, we are pleased to file a Notice of Commencement of Service and receipt of OFAC license authorizing settlement payments to ETECSA, the telecommunications carrier for Cuba. This notice also is intended to comply with the Commission's directive that a 10 day notice be provided in advance to the extent the licensee elects to modify out-bound routing as business and technical considerations may warrant so long as a change does not involve facilities constructed for the specific purpose of routing traffic between the U.S. and Cuba. As ACI confirms in its Notice, the substituted facilities are currently in place, were not constructed for the specific purpose of routing traffic between the United States and Cuba, and traffic to Cuba will continue to transit via SatMex facilities.

Kindly stamp and return the File Copy associated herewith, and contact the undersigned in the event there are questions regarding this filing.

Sincerely yours,

Curtis T White

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, DC 20554

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Federal Communications Commission

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)) ITC-214-2003001121000528))	Policy Division International Bureau
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NOTICE OF COMMENCEMENT OF SERVICE UNDER LICENSE AND RECEIPT OF OFAC LICENSE AUTHORIZING PAYMENTS

Allied Communications International, Inc. (ACI), pursuant to the Commission's action in *Order*, *Authorization and Certificate*, DA-05-699, issued under Designated Authority on March 17, 2005, ACI hereby respectfully provides notice of (i) its intention to commence service, and (ii) receipt of a license from the Office of Foreign Assets Control (OFAC), which authorizes all necessary transactions incident to providing telecom services under said *Order*, including the transfer of funds to Empresa de Telecomunicaciones de Cuba (ETECSA) as correspondent's compensation for telecommunications traffic as may be routed through a third-country.² The following is offered:

¹ See Order, Authorization and Certificate, File No. ITC-0214-20031121-00528, DA 05-699 (rel. March 17, 2005) [hereinafter Order].

² See Letter from Elizabeth W. Farrow, Assistant Director for Licensing, Office of Foreign Assets Control, Department of Treasury, License No. CU-75100, dated November 3, 2005.

- 2. ACI has successfully obtained all licenses necessary to commence the telecommunications services authorized under the Commission's *Order*, and intends to commence the provisioning of voice and data traffic fourteen (14) days after the date of this notice.
- 3. In its *Order* of March 17, 2005, the Commission granted ACI's request to modify its routing arrangement between the U.S. and SatMex facilities in Mexico as business and/or technical considerations may warrant so long as a change did not involve facilities constructed for the specific purpose of routing traffic between the U.S. and Cuba.
- 4. ACI has concluded that the most cost-efficient route for its voice and data at present is as follows: Qwest providing backhaul within CONUS down to the NAP in Miami, FL (50 NE 9trh St., Second Floor, Miami, FL 33131), then handed off to the SMITCOMS SMPR-1 fiber optic cable system (situated in the NAP); traffic will then transit to Sint Maarten, NA (Falcon Drive #3, Harbor View, Phillipsburg) where it will be uplinked via SMITCOMS' earth station and connected via SatMex transponder for delivery to ETECSA. In sum, the SMPR-1 cable is substituted for LANautilus facilities set out in ACI's amendment of March 4, 2005.
- 5. The facilities currently exist, they currently provide services for other carriers, and they were not constructed for the specific purpose of routing traffic between the United States and Cuba.
- 6. ACI is providing notice of the out-bound modification 10 days in advance of commencement of service in furtherance of the Commission's Order.³

³ See Order at ¶ 6.

WHEREFORE, ACI respectfully requests the Commission accept this Notice of Commence of Service and Receipt of OFAC license, and associate said notice with the official file for ACI's Cuba 214 license.

Respectfully submitted,

Allied Communications International, Inc.

Curtis I White

President

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