



Homeland
Security

March 6, 2018

Ms. Marlene H. Dortch
Federal Communications
Commission 445 12th St. SW,
Room TW-B204
Washington, DC 20554

Re: Space Net LLC ITC-214-20061204-00538

Dear Ms. Dortch:

The Department of Homeland Security (“DHS”) with the concurrence of the Department of Justice (“DOJ”), to include the Federal Bureau of Investigation (FBI), (collectively, the “Agencies”), hereby requests that the Federal Communications Commission (“FCC”) terminate, declare null and void and no longer in effect file number ITC-214-20061204-00538 granted to Space Net LLC (Space Net) on August 1, 2007, and the corresponding Letter of Assurance (“LOA”) because Space Net is no longer in business.

Prior to Space Net receiving the aforementioned authorization, the Agencies issued their non-objection on the condition that Space Net abide by the commitments and undertakings contained in its July 25, 2007, LOA to DHS, DOJ and FBI.

The Agencies assess that Space Net is no longer in business based on attempted contact with the company, evidence acquired through open source research and through information provided by a former point of contact. On July 31, 2012, DHS attempted to contact Matthew Schulman, the designated point of contact for Space Net, via email but the correspondence was returned. On August 17, 2012, DHS reached out to Edward Maldonado, a previous colleague of Mr. Schulman and counsel for Space Net, to determine whether Mr. Maldonado had any additional information regarding Space Net. DHS received no response. DHS reached out again to Mr. Maldonado on December 12, 2016, and Mr. Maldonado responded that he had not been in contact with anyone at Space Net since the second quarter of 2009. However, Mr. Maldonado was able to provide a telephone number for the last known contact at Space Net. DHS called the number and confirmed it is no longer in service. On January 22, 2018 DHS sent a certified letter to Mr. Faouzi Abboud, the signatory of the LOA, at the last known address on file: 777 Silver Spur

Road, Rolling Hills Estates, CA 90214. This letter was returned to DHS and marked undeliverable. Furthermore, Space Net has never filed any reports of its international traffic and revenue with the FCC.¹

In light of these developments, the Agencies request the FCC terminate, declare null and void and no longer in effect the international Section 214 authorization issued to Space Net, file number ITC-214-20061204-00538, and the corresponding LOA.

Should you have any questions whatsoever, please do not hesitate to contact me.

Sincerely,

/S/
Phil Ludvigson
Director, Foreign Investment Risk
Management
Office of Policy
U.S. Department of Homeland
Security

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¹ See International Telecommunications Data, Carriers Filing International Traffic Data for 2007-2012 (Space Net not listed).