



U.S. Department of Justice

National Security Division

Foreign Investment Review Staff

Washington, D.C. 20530

December 23, 2015

By Electronic Filing

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

Re: **JuBe Communications, LLC, File No. ITC-214-20070607-00218**
(DA No. 07-3505)

Dear Ms. Dortch:

The Department of Justice, with the concurrence of the Department of Homeland Security and the Federal Bureau of Investigation (collectively, the “Agencies”), hereby notifies the Federal Communications Commission (FCC) of the believed dissolution of JuBe Communications, LLC (JuBe) and the corresponding inability of JuBe to comply with the conditions of its international telecommunications certificate granted on July 27, 2007 (authorization file number **ITC-214-20070607-00218**) (DA No. 07-3505). Given such inability, the Agencies request that the FCC terminate, declare null and void and no longer in effect, and/or revoke JuBe’s current authorization, file number **ITC-214-20070607-00218**.

Prior to JuBe receiving the above-identified certificate, the Agencies expressly conditioned their non-objection to the grant of international 214 telecommunications authorities on “the [FCC] condition[ing] its approval on the assurance of [JuBe] to abide by the commitments and undertakings set forth in its July 12, 2007 letter to Sigal P. Mandelker, Stewart A. Baker, and Elaine N. Lammert,” which was attached to the Agencies’ petition. (*See* Attachment 1 (Pet. To Adopt Cond. To Auth. and Licenses at 1 (July 26, 2007).) As stated in the public notice describing the grant of the above-referenced certificate (DA No. 07-3505), the FCC concurred with the Agencies’ request and conditioned JuBe’s authority to provide facilities-based service in accordance with Section 63.18(e)(1) of the FCC’s rules, and also to provide resale service in accordance with Section 63.18(e)(2) of the FCC’s rules, on JuBe “abiding by the commitments and undertakings contained in its July 12, 2007 letter to Sigal P. Mandelker, Stewart A. Baker, and Elaine N. Lammert.” (*See* Attachment 2 at 1 (Public Notice, DA No. 07-3505) (Aug. 8, 2007).)

The Agencies have reason to believe that JuBe is no longer in existence. Specifically, according to the Texas state corporate website, JuBe was voluntarily dissolved as a corporate

entity and became inactive on October 14, 2010 (see <http://www.texascorporates.com/corp/851900>). Similarly, according to the Office of the Comptroller of Texas, “the entity’s franchise tax responsibilities ended because the entity has ceased to exist in its state or country of formation or has ceased doing business in Texas” (see https://mycpa.cpa.state.tx.us/coa/servlet/cpa.app.coa.CoaGetTp?Pg=tpid&Search_Nm=jube%20&Buttonsearch&Search_ID=32032246756). Further, in an October 19, 2015 e-mail message, Mr. Thomas Lynch, JuBe’s designated contact during the application process, advised the Agencies that he had been unable to reach JuBe after multiple attempts through all his contacts except U.S. postal service (*See Attachment 3*). He noted that he presumed JuBe to be out of business but was not certain. Given all of this information, the Agencies believe that JuBe is neither providing services pursuant to authorization file number **ITC-214-20070607-00218** nor still in existence.

Given the information detailed herein indicating that JuBe is no longer in existence, the Agencies respectively submit to the FCC that JuBe is unable to comply with its commitments in its July 12, 2007 letter to Sigal P. Mandelker, Stewart A. Baker, and Elaine N. Lammert and upon which the Agencies gave their non-objection to the granting of authorities and the conditions of the FCC’s July 27, 2007, grant of an international telecommunications certificate. The Agencies request that the FCC terminate, declare null and void and no longer in effect, and/or revoke the international telecommunications certificate issued to JuBe, authorization file number **ITC-214-20070607-00218**.

Thank you for your consideration.

Sincerely,

/S/ Richard C. Sofield
Richard C. Sofield
Director, Foreign Investment Review Staff
National Security Division
U.S. Department of Justice

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