

Mikelle Morra

From: Ongman, Joanne [Joanne.Ongman@usdoj.gov]
Sent: Wednesday, December 19, 2007 11:43 AM
To: George Li; Susan OConnell; Mikelle Morra; Joann Ekblad; David Krech
Cc: James Ball; Springsteen, Joseph
Subject: FCC application status for the week of December 16, 2007

Good morning:

Please be advised that DOJ and FBI have **NO COMMENT** on the following applications:

Telchin Corp., ITC-214-20051111-00462

Inter-Tel NetSolutions Inc., ITC-T/C-20070608-00221

Please be advised that DOJ and FBI request that the following applications be **REMOVED** from streamline:

Skyhigh Communications LLC, ITC-214-20071101-00448

Metrix Solutions Inc., ITC-214-20071121-00471

E-Phone Communications LLC, ITC-214-20071129-00479

Comsolo LLC/Synchronized Assets Inc., ITC-ASG-20071129-00481

E&F Telecom, Inc., ITC-214-20071204-00484

Octagon Networks, Inc., ITC-214-20071207-00494

Bharti Airtel Limited, ITC-214-20071211-00495

Mabuhay Telecom, Inc., ITC-214-20071212-00501

Please let me know if you have any questions. Thank you.

Mikelle Morra

From: David Krech
Sent: Tuesday, August 05, 2008 6:13 PM
To: Jon Minkoff
Cc: William Davenport; Arthur Lechtman; Mikelle Morra; George Li; Howard Griboff; Susan OConnell; Trent Harkrader
Subject: RE: Possible Unauthorized Service referral [Octagon Networks]

Ok. Thanks.

-----Original Message-----
From: Jon Minkoff
Sent: Tuesday, August 05, 2008 6:12 PM
To: David Krech
Cc: William Davenport; Arthur Lechtman; Mikelle Morra; George Li; Howard Griboff; Susan OConnell; Trent Harkrader
Subject: Re: Possible Unauthorized Service referral [Octagon Networks]

David-Please proceed as described.

Sent from my BlackBerry Wireless Handheld

----- Original Message -----
From: David Krech
To: Jon Minkoff
Cc: William Davenport; Arthur Lechtman; Mikelle Morra; George Li; Howard Griboff; Susan OConnell
Sent: Tue Aug 05 15:58:04 2008
Subject: RE: Possible Unauthorized Service referral [Octagon Networks]

Jon,

The Executive Branch has completed it review of the Octagon Networks, Inc. application.

Is it okay with Enforcement if we grant the application, with our usual language that grant is non-prejudicial to any enforcement action?

Please advise.

Thanks.

DK

From: David Krech
Sent: Wednesday, July 23, 2008 5:23 PM
To: Jon Minkoff
Cc: William Davenport; Arthur Lechtman; Mikelle Morra; George Li; Howard Griboff; Susan OConnell
Subject: RE: Possible Unauthorized Service referral

Thanks Jon.

The Executive Branch has brought to attention another possible instance of unauthorized service ---

Octagon Networks, Inc. (ITC-214-20071207-00494). In its application, Octagon requests authority to provide global resale services pursuant to section 63.18(e)(2) and states that it has not previously received section 214 authority from the Commission. In its response to the Executive Branch, Octagon states that in 2007 that it had \$1.2 million in revenues from selling Octagon-branded prepaid calling cards (as well as \$1.2 million in revenue from distributing prepaid calling cards of unaffiliated third-party resellers). A copy of the application, the attachment to the application and the May 23, 2008 response to the Executive Branch are attached. Let us know if you need anything else.

DK

From: Jon Minkoff
Sent: Wednesday, July 23, 2008 4:25 PM
To: David Krech
Cc: William Davenport; Arthur Lechtman
Subject: RE: Possible Unauthorized Service referral

David-Thanks for the referral. You can continue to use me as the point of contract for these sorts of matters.

In regard to the Call Catchers and STEL, I understand that both matters are still in the investigative process. Generally, once we receive an internal referral, we do not provide updates unless we have substantive or legal questions that require particular expertise. As regarded to Call Catchers and STEL, both cases deal with apparent unauthorized provision of service violations -- an area that we commonly enforce. Thus, we probably will not need further IB assistance in moving forward with the investigations. That said, we greatly appreciate IB's willingness to assist us with the Teleplus investigation back in June, so if there is something particular about these cases that you need for us to keep you looped in before we take formal action, I'd be happy to run it up our chain to see if we are able to accommodate you. Thank you.

*** Non-Public: For Internal Use Only ***

From: David Krech
Sent: Tuesday, July 22, 2008 2:53 PM
To: Jon Minkoff
Cc: Arthur Lechtman
Subject: FW: Possible Unauthorized Service referral

Jon,

Any updates on the status of Call Catchers and STEL Communications?

Also, the Executive Branch has referred another application to us where it appears that the applicants has over a \$1 million in revenue in 2007 from pre-paid calling cards, but does not have a 214 for such services. Should I send the documents to you or is there someone else I should refer this too?

Thanks.

DK

From: David Krech
Sent: Wednesday, June 11, 2008 6:02 PM
To: Jon Minkoff
Cc: Arthur Lechtman; Susan OConnell; George Li; Howard Griboff; Mikelle Morra; John Giusti; William Davenport; Trent Harkrader; James Ball
Subject: RE: Possible Unauthorized Service referral: Teleplus, LLC

Thanks. We will include the language in our grant of the application.

Any update on your review of the Call Catchers and STEL Communications (see attached)?

Thanks.

From: Jon Minkoff
Sent: Wednesday, June 11, 2008 5:29 PM
To: David Krech
Cc: Arthur Lechtman; Susan OConnell; George Li; Howard Griboff; Mikelle Morra; John Giusti; William Davenport; Trent Harkrader; James Ball
Subject: RE: Possible Unauthorized Service referral: Teleplus, LLC

David-Upon further review, we do not think we need additional information in the record. Teleplus admits in section (d) of its application that "Teleplus has not received authority previously under section 214 of the Communications Act." It also admits in its response to the Executive Branch question number one that "100% or revenues are generated from resold US to international calling capacity that is in the form of pre-paid services and sold to retail end users. Applicant estimates that it has at least 1,000 customers."

Accordingly, EB has no issues with IB proceeding with the grant of the application. However, we request that the grant include the language mentioned below about it not prejudicing future enforcement action that may be taken.

Thank you again for coordinating this item with EB.

*** Non-Public: For Internal Use Only ***

From: David Krech
Sent: Thursday, May 29, 2008 7:06 PM
To: Jon Minkoff
Cc: Arthur Lechtman; Susan OConnell; George Li; Howard Griboff; Mikelle Morra; John Giusti; William Davenport; Trent Harkrader; James Ball
Subject: RE: Possible Unauthorized Service referral: Teleplus, LLC

We are fine with that. If you provide us with the questions, we will send them to the applicant.

From: Jon Minkoff
Sent: Thursday, May 29, 2008 4:10 PM

To: David Krech
Cc: Arthur Lechtman; Susan OConnell; George Li; Howard Griboff; Mikelle Morra; John Giusti; William Davenport; Trent Harkrader
Subject: RE: Possible Unauthorized Service referral: Teleplus, LLC

Is IB is open to contacting the applicant and requesting that it supplement its application with information about the possible provision of unauthorized service? This would be similar to how we are proceeding with WCB about a possible unauthorized transfer of assets. Specifically, EB will draft questions, and IB will ask the applicant to supplement its application with the answers.

Non-Public / For Internal Use Only

From: David Krech
Sent: Fri 5/23/2008 3:27 PM
To: Arthur Lechtman; Jon Minkoff; Priya Shrinivasan
Cc: James Ball; Susan OConnell; George Li; Howard Griboff; Mikelle Morra; John Giusti
Subject: RE: Possible Unauthorized Service referral: Teleplus, LLC

Attached is another e-mail from the Justice Department regarding Teleplus.

From: David Krech
Sent: Friday, May 23, 2008 3:22 PM
To: Arthur Lechtman; Jon Minkoff; Priya Shrinivasan
Cc: James Ball; Susan OConnell; George Li; Howard Griboff; Mikelle Morra; John Giusti
Subject: RE: Possible Unauthorized Service referral: Teleplus, LLC

Jon and Priya;

The Executive Branch agencies have completed their review of the Teleplus application for national security and law enforcement issues. Consequently, we are ready to grant the application.

We want to check to see if the Enforcement Bureau is okay with the International Bureau granting the application or if we should wait to grant. If we grant the application, we can include a statement that grant of the application is "without prejudice to any enforcement action by the Commission for non-compliance with the Communications Act of 1934, as amended, or the Commission's rules."

Please let us know how you would like us to proceed. We will not grant the application until we hear from you.

Thanks.

DK

From: Arthur Lechtman
Sent: Wednesday, April 30, 2008 3:11 PM
To: Jon Minkoff; Priya Shrinivasan
Cc: David Krech; James Ball; Susan OConnell; George Li; Howard Griboff; Mikelle Morra; John Giusti
Subject: Possible Unauthorized Service referral: Teleplus, LLC

Hello Jon and Priya--

The Department of Justice has brought to our attention a possible case of the provision of unauthorized service. We would appreciate it if the Enforcement Bureau could look into this matter.

As you may know, when an applicant has 10 percent or greater foreign ownership we refer the application to the Executive Branch for review for national security, law enforcement, foreign policy, and trade concerns. As part of their review, the Executive Branch agencies will send a questionnaire to the applicant to get further information.

Teleplus, LLC filed an application for authority under section 214 to provide international service in 2006. Because the applicant has foreign ownership, the application was referred to the Executive Branch. In its response to the Executive Branch questionnaire, Teleplus states that it has at least 1,000 customers for its pre-paid services and had revenues of \$5 million. Our contact at Justice also found a web-site for Teleplus LLC where one can purchase pre-paid calling cards. As Teleplus states in its section 214 application, it has not previously received section 214 authority, and this application is still pending.

Attached are (1) an e-mail from the applicant with its updated section 214 application and its response to the Executive Branch questionnaire, and (2) the e-mail from the Department of Justice bringing this matter to our attention and citing the Teleplus web-site.

If you need any further information regarding this, please contact David Krech (418-7443) in the IB Policy Division.

Thanks!

Artie

*** Non-Public: For Internal Use Only ***

Mikelle Morra

From: Mikelle Morra
Sent: Thursday, August 28, 2008 12:55 PM
To: 'Kent Bressie'; 'debbie@octagonprepaid.com'; 'charly@greenmediagraphics.com'; 'reg@regnumgroup.com'; 'rbo@regbackoffice.com'
Cc: George Li; David Krech; Susan OConnell; JoAnn Sutton; James Ball; Janeese Parker; Mikelle Morra; 'Damian, Alex (DHS)'; 'Pinto, Greg (DHS)'; 'Connors, John'; 'Daniels, Douglas'; 'TTelecom'; 'Thomas Doyle'; 'Rockoff, Jennifer'; 'Orgman, Joanne'; 'letsw@state.gov'; 'Dupuy, Siobhan'; 'dklein1@leo.gov'; 'Wheaton, Mary (NSD)'
Subject: FCC Section 214 Granted
Attachments: TEL01302.pdf

Octagon Networks, Inc.
ITC-214-20071207-00494

Isan Telecom, Inc.
ITC-214-20080204-00044

The above listed applications have been granted by Public Notice released August 28, 2008; Report No. TEL-01302, DA 08-1994 (attached).

Mikelle

Mikelle Morra
Mikelle.Morra@fcc.gov
Federal Communications Commission
International Bureau/ Policy Division
202-418-7151

8/28/2008

Mikelle Morra

From: Ongman, Joanne [Joanne.Ongman@usdoj.gov]
Sent: Wednesday, July 09, 2008 11:39 AM
To: George Li; Susan OConnell; Mikelle Morra; David Krech; Jodi Cooper; Francis Gutierrez; Howard Griboff; JoAnn Sutton
Cc: James Ball; Wheaton, Mary (NSD)
Subject: [TT] FCC application status for the week of July 7, 2008

Good Morning -

1. Please be advised that DOJ/FBI/DHS have **NO COMMENT** regarding the following applications:

Network Expert Group, ITC-214-20080610-00262
TechQip, Inc., ITC-214-20080331-00160
M Telecom, LLC (formerly known as Metropy Global Networks, LLC) ITC-214-20060601-00297
Octagon Networks, Inc., ITC-214-20071207-00494
ITC International Telecommunications Corp., ITC-214-20080528-0024
BellVoz, LLC ITC-214-20080310-00138

2. Please also be advised that DOJ/FBI/DHS request that the following application referenced in EB 2008-25 be **REMOVED** from streamline:

ITC-214-20080613-00269 - Cosmobridge America, Inc.

3. In addition, we are preparing a submission in WC Docket No. 08-79 referenced in EB 2008-29, and note that the due date for this submission is July 11, and our submission will be filed by that date.

Please let me know if you have any questions.

Many thanks.

Joanne P. Ongman
202-514-0661

7/9/2008

Mikelle Morra

From: George Li
Sent: Wednesday, July 09, 2008 12:05 PM
To: 'Rockoff, Jennifer'; Ongman, Joanne'; Susan OConnell; Mikelle Morra; David Krech; Jodi Cooper; Francis Gutierrez; Howard Griboff; JoAnn Sutton
Cc: James Ball; 'TTelecom'
Subject: RE: [TTT] FCC application status for the week of July 7, 2008

Thank you Jennifer.

We will hold the grant for these two applications pending further investigation.

From: Rockoff, Jennifer [mailto:Jennifer.Rockoff@usdoj.gov]
Sent: Wednesday, July 09, 2008 11:56 AM
To: Ongman, Joanne; George Li; Susan OConnell; Mikelle Morra; David Krech; Jodi Cooper; Francis Gutierrez; Howard Griboff; JoAnn Sutton
Cc: James Ball; TTelecom
Subject: RE: [TTT] FCC application status for the week of July 7, 2008

Hello FCC, while we have no comment per Joanne's email below, we wanted to alert you to the following as well:

M Telecom, LLC (ITC-214-20060601-00297): The Applicant informed us that it earned approximately \$4 million in annual revenues in 2007 from the wholesale of VoIP services. It is unclear to us whether licenses were required in order to perform these services for which this revenue was received.

Octagon Networks, Inc. (ITC-214-20071207-00494): The Applicant informed us that it earned annual revenues of \$2.4 million in 2007, with half this revenue coming from sales of its own prepaid calling cards and half from the distribution of third-party calling cards. It is unclear to us whether licenses were required in order to perform these services for which this revenue was received.

Please let us know if you would like any further information on either of these two cases. Many thanks, Jennifer

From: Ongman, Joanne
Sent: Wednesday, July 09, 2008 11:39 AM
To: George Li; Susan OConnell; Mikelle Morra; David Krech; jodi.cooper@fcc.gov; Francis Gutierrez; howard.griboff@fcc.gov; Joann Ekblad
Cc: James Ball
Subject: [TTT] FCC application status for the week of July 7, 2008

Good Morning -

1. Please be advised that DOJ/FBI/DHS have **NO COMMENT** regarding the following applications:

Network Expert Group, ITC-214-20080610-00262
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Octagon Networks, Inc., ITC-214-20071207-00494
ITC International Telecommunications Corp., ITC-214-20080528-0024
BellVoz, LLC ITC-214-20080310-00138

2. Please also be advised that DOJ/FBI/DHS request that the following application referenced in EB 2008-25 be

7/9/2008

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Please let me know if you have any questions.

Many thanks.

Joanne P. Ongman

202-514-0661