



Federal Communications Commission  
Washington, D.C. 20554

International Bureau

E-mail: [James.Ball@fcc.gov](mailto:James.Ball@fcc.gov)  
[George.Li@fcc.gov](mailto:George.Li@fcc.gov)

(202) 418-1462  
(202) 418-2824 (fax)  
February 21, 2008  
Ref: 2008-7

Hillary Morgan	(703) 607-6092	Steven W. Lett	(202) 647-5835
Stephen Heifetz	(202) 282-8973	Alex Damann	(202) 282-9940
Josephine Arnold	(202) 482-5461	Edward T. Hand	(202) 514-2464
Kenneth Schagrim	(202) 395-5663	Sally Shipman	(202) 456-6085
John Connors	(202) 305-4218	Jon D. Pifer	(202) 324-8124

Re: Section 214 and 310 (b)(4) Applications

Dear Sir or Madam:

Please review the following applications and advise us whether you have any national security, law enforcement, foreign policy or trade concerns by **C.O.B. March 12, 2008**, because we are prepared to take action on these applications. **Electronic filed (e-file) applications are able to be viewed by accessing [www.fcc.gov/ibfs](http://www.fcc.gov/ibfs) and searching by the file number.**

**ITC-214-20080114-00012(e-file)**

Tycoon Oil Company's application for authority to provide facilities-based and resale services between the United States and permissible international points. Applicant is 100% owned by Universal I.T. Inc., which is 100% owned by a citizen of **France**.

**ITC-214-20080215-00061(e-file)**

General Telecard LLC's application for authority to provide facilities-based and resale services between the United States and permissible international points. Applicant is 50% owned by a citizen of the **Dominican Republic**.

**ITC-214-20080221-00085(e-file)**

Virtual Communications, LLC's application for authority to provide facilities-based and resale services between the United States and permissible international points. Applicant is 100% owned by a citizen **Colombia**.

**ISP-PDR-20080212-00003 (e-file)**

Cellco Partnership d/b/a Verizon Wireless (Verizon Wireless or "Petitioner") requests that the Commission extend Verizon Wireless's current authority, under Section 310(b)(4) of the Communications Act of 1934, as amended (the "Act"), to hold interests in common carrier radio licenses to encompass the licenses that are proposed to be assigned to Vista (Mirror 1) PCS License Holding, L.L.C. (Mirror 1 Sub), and to

encompass Mirror 1 Sub, which, upon consummation of the proposed transaction, will be owned 100 percent by Verizon Wireless. Verizon Wireless filed its petition for declaratory ruling in connection with an application for assignment of six broadband Personal Communications Service (PCS) licenses from Vista License Holdings, L.L.C. to Mirror 1 Sub. *See* File No. 0003286009.

The Petitioner states that the Commission has previously approved Verizon Wireless's foreign ownership pursuant to Section 310(b)(4), citing Applications of Vodafone AirTouch Plc and Bell Atlantic Corporation for Consent to Transfer Control or Assignment of Licenses and Authorizations, Memorandum Opinion and Order, 15 FCC Rcd 16507 (WTB/Int'l Bur. 2000). Petitioner represents that no changes have occurred in its foreign ownership since that authorization was granted. Thus, according to Petitioner, the proposed transaction raises no new foreign ownership issues, and the Commission can and should extend the previous Section 310(b)(4) authorization to the subject PCS licenses and to Mirror 1 Sub pursuant to the rules and policies established in the Foreign Participation Order, 12 FCC Rcd 23891 (1997), Order on Reconsideration, 15 FCC Rcd 18158 (2000).

If we do not hear from you by **C.O.B. March 12, 2008**, we will assume that you do not have any concerns with the above listed applications.

**From:** Veronica Garcia-Ulloa  
**Sent:** Thursday, February 21, 2008 3:17 PM  
**To:** 'paul.kozak@ic.fbi.gov'; 'dklein1@leo.gov'; 'edward.hand@usdoj.gov'; 'hillary.Morgan@disa.mil'; 'jarnold@nta.doc.gov'; 'kschagrin@ustr.gov'; 'Brian.williams@associates.dhs.gov'; 'Springsteen, Joseph'; 'vbarish@askcalea.net'; 'maydc@state.gov'; 'lettsw@state.gov'; 'alane.kochems@associates.HQ.DHS.GOV'; 'Stephen.heifetz@dhs.gov'; 'Underriner, Jennifer'; 'Christopher.Siefken@ic.fbi.gov'; 'Pifer, Jon (LEO)'; 'Pinto, Greg (DHS)'; 'sshipman@ostp.eop.gov'; 'Erica.Bomsey@dhs.gov'; 'Daman, Alex (DHS)'; 'Pinto, Greg (DHS)'; 'Daniels, Douglas'; 'Connors, John'; 'telecom@usdoj.gov'; 'Joanne.Ongman@usdoj.gov'; 'shannon.culbertson@associates.dhs.gov'; 'Margaret.Dudek@dhs.gov'; 'Jennifer.Rockoff@usdoj.gov'; 'Sanaz.Kangarloo@usdoj.gov';  
**Cc:** George Li; Susan OConnell; David Krech; Joann Ekblad; Mikelle Morra; James Ball; Janeese Parker; Veronica Garcia-Ulloa; Francis Gutierrez; Howard Griboff; Jodi Cooper  
**Subject:** Cover Letter Reference 2008-7 (Comments Due: March 12, 2008).  
**Attachments:** Executive Branch 2008-7.doc

Good Afternoon,

Attached is cover letter Ref: 2008-7 (**Comments Due: March 12, 2008**).

Thank you,

Veronica Garcia-Ulloa  
Veronica.Garcia-Ulloa@fcc.gov  
Federal Communications Commission  
International Bureau/Policy Division  
(202) 418-0481

**JoAnn Sutton**

---

**From:** Wheaton, Mary (NSD) [Mary.Wheaton2@usdoj.gov]  
**Sent:** Friday, April 24, 2009 11:26 AM  
**To:** Alonzo Beyene; TTelecom  
**Cc:** douglas.daniels@dhs.gov; JoAnn Sutton; telecomfederal@regbackoffice.com; Rockoff, Jennifer  
**Subject:** RE: Virtual Communications LLC - AB Email to Team Telecom - RE: FCC ITC-214-20080221-00085 VIRTUAL COMMUNICATIONS LLC

Good Morning,

We are granting the 2 week extension, however, the sooner the Applicant is able to complete our questions, the sooner we will be able to complete our review. So we reiterate our request that the Applicant respond as soon as possible.

If you have any questions, please do not hesitate to ask.

Thank You,

*Mary Wheaton*  
NSD  
(202) 514-5098  
Mary.Wheaton2@usdoj.gov

---

**From:** Alonzo Beyene [mailto:abeyene@regbackoffice.com]  
**Sent:** Friday, April 24, 2009 8:45 AM  
**To:** Wheaton, Mary (NSD); TTelecom  
**Cc:** douglas.daniels@dhs.gov; 'JoAnn Sutton'; telecomfederal@regbackoffice.com  
**Subject:** Virtual Communications LLC - AB Email to Team Telecom - RE: FCC ITC-214-20080221-00085 VIRTUAL COMMUNICATIONS LLC

Mrs. Wheaton and Mr. Daniels,

The following is a request for a 2 week extension from the April 27, 2009 deadline, in regards to the Team Telecom requested data from Virtual Communications LLC (ITC-214-20080221-00085). The applicant needs the additional time to finish collecting detailed data on its new network capabilities and its officers. Note that applicant is a VoIP service provider.

The applicant is interested in pursuing its application and is working to provide the most complete set of answers possible to the best of its abilities. There is a bit of an additional strain on applicant's regulatory staff during the March / April 2009 time period due to general tax and FCC telecom regulatory reporting deadlines coming due within the same time period.

From our side, please note that to better facilitate the FCC 214 application and team telecom review process for new applicants with foreign ownership, we ask applicants to collect the usual DOJ Triage required data prior to submitting their FCC 214 application, in order to provide Team Telecom the required data as efficiently and quickly as possible upon receiving the standard team telecom emailed data request.

4/24/2009

If you have any questions, please feel free to contact me either by telephone or email.  
Best Regards

Anteneh "Alonzo" T. Beyene  
CFO, COO & Regulatory Analyst  
Regulatory Back Office, Inc.  
"RBO" Your Back Office Solution  
7925 NW 12 Street, Suite 300  
Miami, FL 33126  
Toll Free#: (877) 245-6326  
Direct#: (305) 477-7580 Ext# 105  
Facsimile#: (305) 477-7504  
Email: [finance@regbackoffice.com](mailto:finance@regbackoffice.com)  
Email: [abeyene@regbackoffice.com](mailto:abeyene@regbackoffice.com)  
Web: [www.regbackoffice.com](http://www.regbackoffice.com)

The information in this e-mail is confidential and may be legally privileged. It is intended solely for the addressee. If you are not the intended recipient please delete. Any views expressed in this message are those of the individual sender, except where the sender specifically states them to be the views of Regulatory Back Office, Inc.

---

**From:** Wheaton, Mary (NSD) [mailto:Mary.Wheaton2@usdoj.gov]  
**Sent:** Friday, March 27, 2009 8:55 AM  
**To:** [rbo@regbackoffice.com](mailto:rbo@regbackoffice.com)  
**Cc:** Rockoff, Jennifer; Wheaton, Mary (NSD)  
**Subject:** FCC ITC-214-20080221-00085 VIRTUAL COMMUNICATIONS LLC

Good Morning,

The U.S. Department of Justice and other federal agencies routinely conduct reviews of certain applications submitted to the Federal Communications Commission (FCC). We are currently reviewing FCC application ITC-214-20080221-00085 (Virtual Communications LLC).

To assist us in this review, we request that Virtual Communications LLC provide responses to the questions in the attached document within 30 days from the date of this email. These responses will be shared with representatives of the Departments of Homeland Security and Defense and the Federal Bureau of Investigation. If we do not receive a response within this timeframe indicating a continued interest in this matter, we will assume the applicant is no longer interested in pursuing its application and will advise the FCC that we are recommending the application be dismissed without prejudice as to refiling.

<<FIRS TT 08-13 Triage Questions Updated 3-27 2009.doc>>

Return to the following address: [FIRS-TT@usdoj.gov](mailto:FIRS-TT@usdoj.gov).

Should you have any questions or concerns, please contact Jennifer Rockoff at (202) 353-0008.

Thanking you in advance,

*Mary Wheaton*  
NSD  
(202) 514-5098  
*Mary.Wheaton2@usdoj.gov*

4/24/2009