

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Sumo Technologies, LLC)
)
And) **File No.: ITC-214-20080612-00266**
Company Member Enrique Baiz)
(“Transferor”))
)
And)
Company Member **Caral Investment Corp.;**)
Athenian Venture Partners III L.P; and)
Berwind LLC)
(Transferees))
)
Application for Authority Pursuant)
to Section 214 of the)
Communications Act of 1934,)
as amended, to Transfer Control of)
international facilities-based and resale)
Authority of common carrier)
_____)

**JOINT APPLICATION FOR TRANSFER OF CONTROL
OF INTERNATIONAL AUTHORITY OF
SUMO TECHNOLOGIES, L.L.C.**



By and through its Attorney:
Edward A. Maldonado, Esq.

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Joint Application

Enrique Baiz, controlling Member of Sumo Technologies, LLC (“BAIZ”), together with Caral Investment Corp. (“CARAL”) a Minority Member of Sumo Technologies, LLC; ATHENIAN Venture Partners III L.P, a private investment firm (“ATHENIAN”); and Berwind LLC a Private Equity, and investment firm (“BERWIND”) collectively called the "Applicants" hereby request a transfer of control of Sumo Technologies, LLC’s the international authority pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. Section 214 et. al. (1982), and Section 63.18 of the Federal Communication Commission's (hereafter called “Commission”) Rules, 47 C.F.R. Section 63.18, in order to provide global or limited international facilities-based and resale services between the United States and international points, except those international point not authorized by the Commission as updated from time to time on the Commission’s

Exclusion List under a new ownership structure. In support of this application, the Applicants state as follows:

I. INTRODUCTION: **Summary of the Contemplated Transaction**

Licensee Sumo Technologies is a telecommunications company that provides international telecommunications services pursuant to authority by the Commission under ITC-214-20080612-00266. Sumo Technologies provides both international telecommunications services and international VoIP services to the public, other carriers, as well as consumers. Sumo has operated since 2008 and has sustained its upstart operations throughout the recent economic recession. However Sumo Technologies now requires further capital investment to sustain itself, continue offering its services to the public, and ensure that services to carriers and consumers alike are uninterrupted in light of growth and debt commitments of the company. In response, CARAL, ATHENIAN, and BERWIND, all private investment companies have agreed to invest the necessary and required capital to sustain Sumo Technologies under a transaction (“Transaction”) wherein they will each investor will vest with equity stake holds in the Licensee in exchange for minority stake holdings in Sumo Technologies. In the case of CARAL, it is already a passive investor holding less than ten percent (10%) in equity of the Licensee, the consummation of this Transaction will increase its equity stake in the Licensee from nine and a half percent (9.5%) equity interest to nineteen and one half percent (19.5%). In the cases of ATHENIAN and BERWIND, the transaction will result in equity positions less than percent (10%) in the Licensee, more respectively a seven and one half percent (7.5%) interest. The Transaction will be entirely seamless for consumers of Sumo Technologies and carriers dealing with Sumo Technologies, as it will not result in any change in the management of Sumo Technologies or discontinue or impair Sumo Technologies services. On the contrary, the Transaction will only better stabilize Sumo Technologies to continue offering its services in an unstable post-recession environment.

Applicant BAIZ presently holds seventy percent (70%) interest in the Licensee and will transfer a total of twenty-five percent (25%) to CARAL, ATHENIAN, and BERWIND upon consummation of the transaction, with Commission approval. As a single shareholder, BAIZ

shall continue to have controlling interest, forty-five percent (45%), in the Licensee as a result of the proposed transaction. BAIZ is a U.S. Citizen. Applicant CARAL is a U.S. investment company and does not provide international telecommunications services. CARAL presently possesses a nine percent (9%) equity interest in Sumo Technologies, LLC (“Sumo Technologies” or “Licensee”) and is, and has been, a passive investor in the Licensee. CARAL is not affiliated with a foreign carrier in a destination market, nor does it have an affiliation with a dominant U.S. carrier whose international switched or private line services it seeks authority to resell. Applicant ATHENIAN is a U.S. investment company and does not provide international telecommunications services. ATHENIAN presently holds no equity in the Licensee, but shall invest the resources necessary for the Licensee to continue operating and competing in the competitive marketplace of international telecommunication services in exchange for a minority equity position of less than ten percent (10%) in Sumo Technologies. ATHENIAN is not affiliated with a foreign carrier in a destination market, nor does it have an affiliation with a dominant U.S. carrier whose international switched or private line services it seeks authority to resell. Applicant BERWIND is a U.S. investment company and does not provide international telecommunications services. BERWIND presently holds no equity in the Licensee, but shall invest the resources necessary for the Licensee to continue operating and competing in the competitive marketplace of international telecommunication services in exchange for a minority equity position of less than ten percent (10%) in Sumo Technologies. BERWIND is not affiliated with a foreign carrier in a destination market, nor does it have an affiliation with a dominant U.S. carrier whose international switched or private line services it seeks authority to resell.

The Licensee subject to the requested change of control serves customers throughout the United States, but primarily end users in the state of Florida. By granting this application, the Commission will serve the public interest, convenience and necessity by promoting competition in the international services market. Competition will benefit U.S. consumers by increasing service options and lowering prices. Thus, the public interest will be served by the grant of this Joint Application Request from the above Transferor to the above Transferee(s) of Sumo Technologies’ international Section 214 authority.

II. Request for Streamlined Processing as to ATHENIAN, CARAL and BERWIND

As related to ATHENIAN, CARAL and BERWIND the Applicants respectfully submit that this Application is eligible for streamlined processing pursuant to the Commission's Rules, found at 47 C.F.R. § 63.12(a). This Application is eligible for streamlined processing pursuant to Section 63.03(b)(2)(i) because, immediately following the transactions: (1) No applicant or its affiliate(s), as defined in Section 3(1) of the Communications Act (hereafter called "Affiliates") combined shall hold a ten percent (10%) or more share of the interstate and/or interexchange market; and (2) the Applicants nor their Affiliates are, or will be, dominant with respect to any service before or after the transaction.¹

In support of this Application, Applicants provide the following information:

II. DESCRIPTION OF THE APPLICANTS

A. Sumo Technologies, LLC ("Licensee")

Sumo Technologies, LLC is a Florida Limited Liability Company operating from the State of Florida and provides global facilities based and resold international telecommunications services to the public pursuant to 47 U.S.C § 214 et. al. under Commission Authority **ITC-214-20080612-00266**.

B. Enrique Baiz ("Transferor")

Enrique Baiz ("BAIZ") is natural person and resident of the State of Florida with domiciled at 371 Poinciana Drive, Sunny Isles Beach, Florida, 33160 for purposes of this Application. BAIZ presently holds seventy percent (70%) of Licensee's outstanding equity and membership interest. BAIZ currently serves as President of the Licensee, and this management position will not change post-Transaction. BAIZ possesses a collective

¹ This Application satisfies the criteria for streamlined processing pursuant to Section 63.12(a) of the Commission's rules, because none of the provisions of Section 63.12(c) of the Commission's rules, that prevent streamlined treatment, apply to the proposed Transaction. No Applicant (CARAL, ATHENIAN, BERWIND, BAIZ or SUMO TECHNOLOGIES) is affiliated with a foreign carrier in a destination market, nor do any have an affiliation with a dominant U.S. carrier whose international switched or private line services it seeks authority to resell. Pursuant to Section 63.12(a) of the Commission's rules, the Commission should deem this Application granted on the 15th day after the date of the public notice listing this Application as accepted for filing.

twenty-three (23) years of experience in the field of telecommunications, and is a United States Citizen. BAIZ is not affiliated with any company holding a dominant position in any international market. Under the contemplated Transaction, BAIZ will transfer Membership and equity interest in the Licensee from himself to CARAL, ATHENIAN and BERWIND in exchange for investment into Sumo Technologies. Thereafter, Sumo Technologies may be structured as a holding company or under a holding company under the control of the Applicants. This shall be determined based upon need of the Applicants and the Licensee.

C. Caral Investment Corp. (“Transferee”)

CARAL is a privately-held Florida corporation with its principal offices at 355 Alhambra Circle, Suite 801, Coral Gables, FL, 33134 and presently holds nine percent (9%) of Licensee’s outstanding equity and membership interest. CARAL is structured as an investment fund held by family members that primarily invest in the business sectors of agribusiness within Latin America including sugar mills in Colombia and Peru. The family members are a part of a family-owned commercial group known as “XXXXXXXXXX” that has been in operation over several generations since 1864.² CARAL and the above owners previously were reviewed by the Commission and Team Telecom in the original application of the Licensee under ITC-214-20080612-00266, at the request of the Commission and Team Telecom. CARAL’s participation in the Licensee was approved on 02/03/2009. No material change to the ownership or business of CARAL has transpired since the time of the Team Telecom review. Upon consummation of the Transaction, after Commission approval, CARAL will hold a nineteen and one half percent (19.5%) equity position in the Licensee, and, will hold one Board of Director appointment with voting rights equal to its equity position.

² See XXXXXXXXXX for further information on the Applicant’s other businesses.

D. ATHENIAN Venture Partners III L.P (“Transferee”)

ATHENIAN Venture Partners III L.P is a Delaware limited Partnership Corporation with its principal offices at 20 East Circle Drive #37146 Suite 229 Athens OH 45701-3751 and a Florida office at 2881 E. Oakland Park Boulevard Ft. Lauderdale, FL 33306 (“ATHENIAN”). ATHENIAN is a private investment fund/firm that primarily invests in the business sectors of information technology and healthcare technology.³ Upon consummation of the Transaction, after Commission approval, ATHENIAN will hold a 7.7% equity position in the Licensee, and, will hold one Board of Director appointment with voting rights equal to its equity position. ATHENIAN will be represented on the Board of Sumo Technologies by Mr. Mitch Rosich, who is a U.S. Citizen.

E. Berwind LLC (“Transferee”)

Berwind LLC is a Limited Liability Company formed under the laws of the State of Utah, with its principal offices at 6 Lancaster County Road, Harvard, Massachusetts 01451. BERWIND is a private investment fund and venture capital firm that primarily invests in information technology and technology businesses.⁴ Upon consummation of the Transaction, after Commission approval, BERWIND will hold a 7.7% equity position in the Licensee and will hold one Board of Director appointment with voting rights equal to its equity position.

³ See www.AthenianVP.com for further information on the Applicant’s primary business.

⁴ See <http://www.berwindprivateequity.com> for further information on the Applicant’s primary business.

III PUBLIC INTEREST CONSIDERATIONS:

The Applicants believe that the added competition the Transaction contemplated and this Transfer of Control will bring to the market will benefit the consumers of United States-international telecommunications services, and specifically those in the State of Florida and in territories where Sumo Technologies, LLC presently provides services. This includes competitive pricing of services and increased availability of a variety of innovative service options. Therefore, grant of this Application will further the public interest.

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Application Attachment I.
(Information pursuant to 47 CFR § 63.12)

The following information is submitted, as required by 47 CFR § 63.12 of the Commission’s Rules, in support of the Applicants’ request for transfer of Control of Sumo Technologies’ authorization:

In Response to Question 9 of the Application: The Applicants respectfully requests streamline processing pursuant to 47 CFR § 63.12 and certifies that:

1. It is not affiliated with a foreign carrier in a destination market it seeks authority to serve;
2. It has no affiliation with a dominant U.S. carrier whose international switched or private line services the Applicants or the Licensee seeks authority to resell, either directly or indirectly through the resale of another reseller’s services;
3. It does not seek authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines.
4. The Commission has not informed any Applicants or Sumo Technologies in writing that this Application is not eligible for streamlined processing.

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Application Attachment II.
(Information pursuant to 47 CFR § 63.18)

The following information is submitted, as required by 47 CFR § 63.18 of the Commission’s Rules, in support of Applicant’s request for authorization:

47 CFR § 63.18(a): The names, addresses and telephone numbers of the Applicants are as follows:

Licensee:

Sumo Technologies, LLC
371 Poinciana Drive,
Sunny Isles Beach, Florida, 33160
Tel: (305) 468-4996
Fax: (866) 880-8550
Attn: Mr. Enrique Baiz

FRN: 00117825092

Transferor:

Enrique Baiz (a natural person)
371 Poinciana Drive
Sunny Isles Beach, Florida, 33160
Tel: (305) 468-4996
Fax: (866) 880-8550

Transferee(s):

Caral Investment Corp.
355 Alhambra Circle, Suite 801,
Coral Gables, FL, 33134
Tel: (786) 364-8400
Attn: Mark D. Rich, Esq.

Athenian Venture Partners III L.P
20 East Circle Drive #37146 Suite 229
Athens OH 45701-3751
Tel: 614-360-1155
Fax: 740-593-9311
Attn: Karl O elderkin

Berwind LLC
6 Lancaster County Road,
Harvard, Massachusetts 01451.
Tel: (978) 391-1244
Fax: (978)391-1255
Attn: Russell Shappy, Jr.

47 CFR § 63.18(b): Jurisdiction of Persons and Organizations

- (1) Licensee: **Sumo Technologies, LLC** is a **limited liability company** incorporated under the laws of the **State of Florida**.
- (2) Transferor: **Enrique Baiz** is a natural person, United States Citizen and resident of the **State of Florida**.
- (3) Transferee CARAL: **Caral Investment Corp.** is a corporation incorporated under the laws of the **State of Florida**.
- (4) Transferee ATHENIAN: **Athenian Venture Partners III L.P** is a limited partnership incorporated under the laws of the **State of Delaware**.
- (5) Transferee BERWIND: **Berwind LLC Private Equity** is a Limited Liability Company formed under the laws of the **State of Utah**.

48 CFR § 63.18(c): Correspondence concerning this application should be sent to:

For **Sumo Technologies, LLC**
1749 NE Miami Court Suite 206
Miami FL 33132
Tel: (305) 468-4996
Fax: (866) 880-8550
Attn: Mr. Enrique Baiz

With Copy to: **Edward A. Maldonado, Esq.**
Maldonado Law
815 Ponce de Leon Blvd. Suite 304
Miami, FL 33134
Tel: 305-477-7580
Fax: 305-477-7504
E-mail: eam@maldonado-group.com

For **Caral Investment Corp.**
355 Alhambra Circle, Suite 801,
Coral Gables, FL, 33134
Tel: (786) 364-8400
Attn: Mark D. Rich, Esq.

For **Athenian Venture Partners III L.P**
20 East Circle Drive #37146 Suite 229
Athens OH 45701-3751
Tel: 614-360-1155
Fax: 740-593-9311
Attn: Karl O Elderkin

For **Berwind LLC**
6 Lancaster County Road,
Harvard, Massachusetts 01451.
Tel: (978) 391-1244
Fax: (978)391-1255
Attn: Russell Shappy, Jr.

In Response to Question 14 and 15 of FCC 214 Application:

47 CFR § 63.18(d): Sumo Technologies, LLC has previously received authority under Section 214 of the Act. Applicants BAIZ and CARAL have been previously approved by the Commission as owners of the Licensee. ATHENIAN and BERWIND have not received previous authority from the Commission under Section 214 of the Act.

47 CFR § 63.18(e): Applicants by and through their interests in Sumo Technologies request approval for global or limited facilities-based and resale services under Section 214 of the Act and pursuant to the terms and conditions of Section 63.18(e)(1) and (e)(2) of the Commission's Rules. Applicant is not applying for authority to acquire facilities or to provide services not covered by paragraphs (e)(1) through (e)(3) of Section 63.18. Applicant is not seeking facilities-based authority under paragraph (e)(4) of Section 63.18.

47 CFR § 63.18(g): Applicants by and through their interests in Sumo Technologies will use previously authorized facilities to provide the services requested by the Application. Applicants are excluded from environmental assessment pursuant to Section 1.1306 of the Commission's Rules, specifically 47 C.F.R. § 1.1306.

CFR § 63.18(h): Following the completion of the transaction between the Applicants the information regarding the 10% or greater direct or indirect owners of Sumo Technologies, LLC shall be as follows:

Name :	Caral Investment Corporation
Address:	355 Alhambra Circle, Suite 801, Coral Gables, FL, 33134
Citizenship:	U.S. Corporation
Principal Business:	Investment Company
Ownership:	19.5%

Caral Investment Corporation is a privately-held company Florida Corporation which is held by three family members who are foreign nationals. None of the three foreign national owners shall individually hold no more than six and one half percent (6.5%) indirect interest in Sumo Technologies based upon the contemplated transaction. The persons or entities holding ten percent (10%) or more of the shares of Caral Investment Corporation are as follows:

Name:	[REDACTED]
Address:	355 Alhambra Circle, Suite 801, Coral Gables, FL, 33134
Citizenship:	Colombian Citizen
Principal Business:	Investor
Ownership:	33.33%

Name:	[REDACTED]
Address:	355 Alhambra Circle, Suite 801, Coral Gables, FL, 33134
Citizenship:	Colombian Citizen
Principal Business:	Investor
Ownership:	33.33%

Name:	[REDACTED]
Address:	355 Alhambra Circle, Suite 801, Coral Gables, FL, 33134
Citizenship:	Colombian Citizen
Principal Business:	Investor
Ownership:	33.33%

There are no interlocking directorates in CARAL.

47 CFR § 63.18(i): The Applicants **CARAL, ATHENIAN, and BERWIND** respectively certify that they are not affiliated with any foreign facilities-based carriers or US dominant carriers.

47 CFR § 63.18(j): The **Applicants CARAL, ATHENIAN, and BERWIND** respectively certify that they do not seek to provide international telecommunication services to any destination country for which any of the following are true:

1. **Sumo Technologies, LLC** is a foreign carrier in that country; or
2. **Sumo Technologies, LLC** controls a foreign carrier in that country; or
3. Any entity that owns more than twenty-five percent (25%) of **Sumo Technologies, LLC**, or that controls **Sumo Technologies, LLC**, controls a foreign carrier in that country.

47 CFR § 63.18(k): Not Applicable.

47 CFR § 63.18(l): Not Applicable.

47 CFR § 63.18(m): Not Applicable.

47 CFR § 63.18(n): The **Applicants** and **Sumo Technologies, LLC** certify that they has not agreed and will not agree in the future to accept any direct or indirect special concessions from a foreign carrier or administration with regards to traffic or revenue flows between the United States and any foreign countries the company is authorized to serve.

47 CFR § 63.18(o): The **Applicants** certify that no party to this application has been denied federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

47 CFR § 63.18(p): The **Applicants** respectively request Streamline Processing of this Application pursuant to Section 63.12 of the Commission's Rules under 47 C.F.R. § 63.12.

CONCLUSION

In conclusion of the foregoing Application and Attachments, the Applicants, by and through Enrique Baiz, certify that all of the information in this application is accurate and correct. For these reasons, respectfully requests that the Commission grant this application.

Respectfully submitted,

By: /s/ Enrique Baiz /s/

Name **Enrique Baiz**

Title: President and Managing Member of
Sumo Technologies, LLC (a Florida company)

By and through their attorney:



/s/ Edward A. Maldonado /s/

Edward A. Maldonado, Esq.

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VERIFICATION

I, Enrique Baiz, state that I am the President and Managing Member of Sumo Technologies, LLC; that I am authorized to make this Verification on behalf of the Applicants; that the foregoing filing was prepared under my direction and supervision; and that the contents are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this September 7, 2012.

By: /s/ Enrique Baiz /s/

Name **Enrique Baiz**

Title: President and Managing Member of
Sumo Technologies, LLC (a Florida company)

CERTIFICATION OF APPLICANT - CARAL

The undersigned hereby certifies, on behalf of Caral Investment Corporation with respect to the foregoing application for Section 214 Authority to provide international services that:

1. Caral Investment Corporation is not affiliated with any foreign carrier in any of the countries to which Caral Investment Corporation proposes to provide service in the foregoing application.
2. Caral Investment Corporation will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.P.R. 63.21-.23
3. Caral Investment Corporation does not seek to provide international telecommunications service to any destination where: (1) Caral Investment Corporation is a foreign caller in that country; (2) Caral Investment Corporation controls a foreign carrier in that country; (3) any entity that owns more than a 25% interest in Caral Investment Corporation, or controls Caral Investment Corporation, controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% of Caral Investment Corporation and are parties to, or the beneficiaries of, a contractual relationship that affects that provision or marketing of international basic telecommunications services in the United States.
4. Caral Investment Corporation has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future
5. Caral Investment Corporation is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
6. The contents of the Application are true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,

This September 7, 2012

By:

[REDACTED]

Name:

[REDACTED]

Title: Director

Caral Investment Corporation (a Florida company)

CERTIFICATION OF APPLICANT -LICENSEE

The undersigned hereby certifies, on behalf of Sumo Technologies, LLC, Inc. with respect to the foregoing application for Section 214 Authority to provide international services that:

1. Sumo Technologies, LLC is not affiliated with any foreign carrier in any of the countries to which Sumo Technologies, LLC proposes to provide service in the foregoing application.
2. Sumo Technologies, LLC will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.P.R. 63.21-.23
3. Sumo Technologies, LLC does not seek to provide international telecommunications service to any destination where: (1) Sumo Technologies, LLC is a foreign caller in that country; (2) Sumo Technologies, LLC controls a foreign carrier in that country; (3) any entity that owns more than a 25% interest in Sumo Technologies, LLC, or controls Sumo Technologies, LLC, controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% of Sumo Technologies, LLC and are parties to, or the beneficiaries of, a contractual relationship that affects that provision or marketing of international basic telecommunications services in the United States.
4. Sumo Technologies, LLC has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future
5. Sumo Technologies, LLC is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
6. The contents of the Application are true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,

This September 7, 2012

By: /s/ Enrique Baiz /s/

Name **Enrique Baiz**

Title: President and Managing Member of
Sumo Technologies, LLC (a Florida company)