



Homeland
Security

March 6, 2018

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

Re: Cablemas International Telecom LLC ITC-214-20080718-00329

Dear Ms. Dortch:

The Department of Homeland Security (“DHS”) hereby requests that the Federal Communications Commission (“FCC”) terminate, declare null and void and no longer in effect file number ITC-214-20080718-00329 granted to Cablemas International Telecom LLC (“Cablemas”) on November 20, 2008, and the corresponding Letter of Assurance (“LOA”) because Cablemas is no longer in business.

Prior to Cablemas receiving the aforementioned authorization, DHS issued its non-objection on the condition that Cablemas abide by the commitments and undertakings contained in its November 19, 2008 LOA to DHS.

DHS assesses that Cablemas is no longer in business based on attempted contact with the company and evidence acquired through open-source research. The company has submitted no deliverables under the agreement, and DHS has been unable to contact Cablemas since the LOA was signed in 2008. Attempts to communicate with the point of contact provided at the time of application have been unsuccessful. The telephone number provided in Cablemas’ Section 214 application as the company and point of contact number, (202) 551-1798, is no longer registered to the point of contact provided in the application, J. Steven Rich. Research conducted by DHS indicates that Mr. Rich is no longer employed by Paul, Hastings, Janofsky & Walker LLP, and DHS was unable to locate current contact information for Mr. Rich. An email sent to the address provided in the application was never answered. On January 31, 2018, a certified letter was delivered to Cablemas’ last known address—1209 Orange Street, Wilmington, DE 19801—requesting the company confirm its compliance with the terms of the LOA. DHS has received no

response to this letter. In Grupo Televisa, S.A.B.'s¹ Annual Report, filed with the Securities Exchange Commission (SEC), Cablemas is listed as a subsidiary of Grupo Televisa, but without operations. Furthermore, Cablemas has never filed any of the FCC's required Traffic and Revenue reports between the years 2006 and 2015,² and the company is not listed in the FCC's Form 499 database.

Given the above information, DHS believes that the company is neither providing services pursuant to authorization file number ITC-214-20080718-00329 nor still in existence. In light of these developments, DHS requests the FCC terminate, declare null and void and no longer in effect the international Section 214 authorization issued to Cablemas, file number ITC-214-20080718-00329, 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

cc:

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¹ Grupo Televisa, S.A.B. is the parent company of Cablemas Telecomunicaciones, S.A.de C.V., Cablemas' parent company, as listed in its Section 214 application.

² See International Telecommunications Data, Carriers Filing International Traffic Data for 2007-2012 (Cablemas not listed).