



Federal Communications Commission
Washington, D.C. 20554

International Bureau

E-mail: James.Ball@fcc.gov
George.Li@fcc.gov

(202) 418-1462
(202) 418-2824 (fax)
August 29, 2008
Ref: 2008-39

Hillary Morgan	(703) 607-6092	Steven W. Lett	(202) 647-5835
Stephen Heifetz	(202) 282-8973	Alex Daman	(202) 282-9940
Josephine Arnold	(202) 482-5461	Edward T. Hand	(202) 514-2464
Jonathan McHale	(202) 395-5656	Sally S. Wentworth	(202) 456-6085
John Connors	(202) 305-4218	Douglas A. Klein	(202) 324-0853

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. Sept. 17, 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 and searching by the file number.**

ITC-214-20080825-00396 (e-file)

Concord Telecom LLC's application for authority to provide resale services between the United States and permissible international points. Applicant is 100% owned by a citizen of **Jordan**.

ITC-214-20080826-00399 (e-file)

Roadway Communications, Inc'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 of **South Korea**.

ITC-214-20080825-00404 (e-file)

Cyber Bell USA, inc's application for authority to provide facilities-based and resale services between the United States and permissible international points. Applicant is 51% owned by a citizen of **Bangladesh**.

ITC-214-20080825-00405 (e-file)

WX Communications Ltd's application for authority to provide resale services between the United States and permissible international points. Applicant is organized under the laws of **Belize** and located in **Belize**. A citizen of **Netherlands**, a citizen of **Philippines**, a citizen of the **U.K.**, and a citizen of **China**, each of whom owns 25% of the applicant.

ISP-PDR-20080731-00015 (e-file)

MetroBridge Networks Licensing, LLC ("MetroBridge Licensing") and MetroBridge Americas (the "Petitioners") request a declaratory ruling that it is in the public interest for MetroBridge Licensing to have indirect foreign investment in excess of the 25 percent benchmark under section 310(b)(4) of the Communications Act of 1934, as amended (the "Act"). MetroBridge filed its petition in conjunction with applications for common carrier radio licenses. See ULS File Nos. 0003487017 and 0003487015.

According to the Petitioners, MetroBridge Licensing is a Delaware corporation that is a wholly-owned subsidiary of MetroBridge Americas, a private company that is organized in Delaware. MetroBridge Americas is a wholly-owned subsidiary of MetroBridge Networks Corporation ("MetroBridge Corporation"), a privately owned **Canadian** company. MetroBridge Corporation, in turn, is a wholly-owned subsidiary of MetroBridge Networks International Inc. ("MetroBridge International"), a publicly owned **Canadian** holding company.

The Petitioners included, as part of the Petition, two shareholder lists dated May 20 and June 12, 2008 that MetroBridge Licensing obtained from the records of Compterserve, the transfer agency used by MetroBridge International, and that contain information about MetroBridge International's shareholders (i.e., each shareholder's name, address, and number of shares owned). Petitioners represent that the shareholders identified on these lists encompass 100 percent of MetroBridge International's shareholders as of May 20 and June 12, 2008, that substantially all of MetroBridge International's shares are held by residents of Canada, a World Trade Organization ("WTO") Member country, and that all of MetroBridge International's shares are held by residents of WTO Member countries.

The Petitioners assert that, pursuant to the rules and policies established by the Commission's Foreign Participation Order, 12 FCC Rcd 23891 (1997), modified by Order on Reconsideration, 15 FCC Rcd 18158 (2000), the indirect foreign ownership of MetroBridge Licensing in excess of the 25 percent benchmark in Section 310(b)(4) of the Act is consistent with the public interest.

If we do not hear from you by **C.O.B. Sept. 17, 2008**, we will assume that you do not have any concerns with the above listed applications.

Sincerely,

George Li, Deputy Chief, Policy Division

From: Janeese Parker
Sent: Friday, August 29, 2008 11:48 AM
To: 'Douglas.Klein@ic.fbi.gov'; 'edward.hand@usdoj.gov'; 'hillary.Morgan@disa.mil'; 'jarnold@ntia.doc.gov'; 'kschagrin@ustr.gov'; 'vbarrish@askcalca.net'; 'maydc@state.gov'; 'lettsw@state.gov'; 'Stephen.heifetz@dhs.gov'; 'Christopher.Siefken@ic.fbi.gov'; 'swentworth@ostp.eop.gov'; 'Erica.Bomsey@dhs.gov'; 'Shannon.culbertson@associates.dhs.gov'; 'margaret.Dudek@dhs.gov'; 'CarrollD@state.gov'; 'Brian.williams@associates.dhs.gov'; 'greg.pinto@dhs.gov'; 'TTelecom@usdoj.gov'; 'Thomas.Doyle@associates.dhs.gov'; 'mary.wheaton2@usdoj.gov'; 'Siobhan.Dupuy@usdoj.gov'; 'Daman.Alex@dhs.gov'; 'Douglas.Daniels@dhs.gov'; 'John.Connors@usdoj.gov'; 'Joanne.Ongman@usdoj.gov'; 'Jennifer.Rockoff@usdoj.gov'; 'jimchale@ustr.gov'

Cc: James Ball; Francis Gutierrez; Howard Griboff; George Li; Susan OConnell; David Krech; JoAnn Sutton; Mikelle Morra; Jodi Cooper; Erin McGrath

Subject: Cover Letter Reference 2008-39 (Comments due: September 17, 2008)

Attachments: Executive Branch 2008-39.doc

Good Afternoon,