

**From:** [Alonzo Beyene](#)  
**To:** [Janeese Parker](#); [telecomfederal@regbackoffice.com](mailto:telecomfederal@regbackoffice.com);  
**cc:** [JoAnn Sutton](#); [George Li](#);  
**Subject:** MTS Telco, LLC - AB Reply to FCC Email -  
**Date:** Tuesday, April 14, 2009 9:06:43 PM  
**Attachments:** [MTS Telco, LLC - FCC 214 - Additional Detailed Answers to FCC Questions 9 to 14.pdf](#)  
[MTS Telco, LLC - FCC 214 - NonDom Attachment Revised .pdf](#)

---

Mrs. Janeese Parker,

Attachment# 1: Answers to FCC 214 Questions 9 to 14 ([Provided in response to FCC Email sent 04/01/2009 8:30 AM](#))

Attachment# 2: FCC 214 Non-Dominant Carrier Application Attachment ([Ownership data revised per client request](#))

Attachment# 1 is in response to the data you had requested on 04/01/2009. Since 04/01/2009, recent changes took for the ownership of applicant (MTS Telco, LLC).

On the FCC 214 filing submitted electronically via FCC IBFS system on March 2009, Business Telecommunications Services, Inc. was listed as 50% owner of applicant. Per the revised attachment submitted ([attachment# 2](#)), please note that Multiphone Latin America Inc. is 100% owner of applicant.

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:** Janeese Parker [mailto:Janeese.Parker@fcc.gov]  
**Sent:** Wednesday, April 01, 2009 8:03 AM  
**To:** telecomfederal@regbackoffice.com  
**Cc:** JoAnn Sutton; George Li  
**Subject:**

Good Morning,

Your application **MTS Telco, LLC, File # ITC-214-20090327-00136** has been reviewed and to complete the process you will need to send in the following information pertaining to **question 14 (ownership information)** for the owners of Multiphone Latin America, Inc. and Business Telecom Services, Inc. as well as their citizenship. Attached is a sample application to follow. Please provide me with the required information no later than **C.O.B. April 15, 2009**; otherwise the application will be dismissed. You may upload the supplemental information via IBFS using the **Pleadings and Comments** tab. If you have any questions you can email me at [Janeese.Parker@fcc.gov](mailto:Janeese.Parker@fcc.gov). Thank You!

---

*Janeese Parker*  
*Federal Communications Commission*  
*International Bureau/Policy Division*  
*Phone: (202) 418-0707*  
*E-mail: [Janeese.Parker@fcc.gov](mailto:Janeese.Parker@fcc.gov)*

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

_____	)	
In the Matter of	)	
<b>MTS Telco, LLC</b>	)	
Application for authority pursuant File No	)	I.T.C.-214-_____
to Section 214 of the	)	
Communications Act of 1934,	)	
as amended, for global authority	)	
to operate as an international	)	
facilities-based and resale carrier	)	
_____	)	

Application:

**MTS Telco, LLC** (“**MTS Telco**”), hereby requests authority, pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. Section 214 (1982), and Section 63.18 of the Commission's Rules, 47 C.F.R. Section 63.18, to provide global international facilities-based and resale services between the United States and international points.

**MTS Telco** is a new U.S. company organized to provide international telecommunications services. **MTS Telco** has no foreign affiliations. **MTS Telco** serves customers throughout the United States from operations based mainly 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 Section 214 authority to **MTS Telco**.

Section 63.18 Information

The following information is submitted, as required by Section 63.18 of the Commission’s Rules, in support of **MTS Telco** request for authorization:

(a)

**MTS Telco, LLC**  
2051 NW 112th Avenue, Suite 114  
Miami, FL 33172

(b) **MTS Telco** is a corporation organized under the laws of the State of Florida.

(c) Correspondence concerning this application should be sent to:

Alonzo Beyene  
Regulatory Back Office, Inc.  
7925 NW 12 Street, Suite 300  
Miami, Florida 33126  
Telephone: 305-477-7580

(d) **MTS Telco** has not received authority previously under Section 214 of the Communications Act.

(e) **MTS Telco**, requests global facilities-based and resale Section 214 authority pursuant to the terms and conditions of Section 63.18(e)(1) and (e)(2) of the Commission's Rules.

(f) At this time, **MTS Telco** seeks no other authorization available under Section 63.18(e).

(g) Not applicable.

(h) **MTS Telco** certifies that it is not affiliated with any foreign or U.S. facilities-based carrier.

In support of this certification, the name, address, citizenship and principal business of the shareholder that controls ten percent or more of MTS Telco is as follows:

Name: Multiphone Latin America Inc.  
Owner Type: Institutional Owner of **MTS Telco**  
Ownership: 100%  
Principal Business: Telecommunications  
Citizenship: USA  
Contact: Jorge Fernandez, Financial Director of Multiphone Latin America Inc.  
Address: 2051 NW 112th Avenue, Suite 114, Miami, FL 33172  
Telephone: (305) 357-2139

(i) **MTS Telco** certifies that it 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.

(j) **MTS Telco** certifies that no party to this application has been denied federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

In conclusion, **MTS Telco** certifies that all of the information in this application is accurate and correct.

For these reasons, **MTS Telco** respectfully requests that the Commission grant this application.

Respectfully submitted,

Jorge Fernandez - Financial Director  
**MTS Telco, LLC**  
2620 S.W. 27 Avenue  
Miami, FL 33133  
Telephone: (305) 358-5850

Date: April 14, 2009

9. **Does the applicant request streamlined processing pursuant to 47 C.F.R. Section 63.12? If yes, include in Attachment 1 a statement of how the application qualifies for streamlined processing.**

Applicant qualifies for streamlined processing because:

- 1) it is not affiliated with a foreign carrier in a destination market.
- 2) it does not have affiliation with a dominant U.S. carrier whose international switched or private line services the Applicant seeks authority to resell (either directly or indirectly through the resale of another reseller's services); and
- 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.

11. **If the applicant is a foreign carrier, or is affiliated (as defined in 47 C.F.R. Section 63.09(e)) with a foreign carrier, provide in Attachment 1 the information and certifications required by Section 63.18(i) through (m).**

Applicant is not a foreign carrier and is not affiliated with a foreign carrier.

14. **[Section 63.18(h)] In Attachment 2, provide the name, address, citizenship and principal business of the applicant's ten percent or greater direct and indirect shareholders or other equity holders, and identify any interlocking directorates.**

(If total ownership percentage does not equal 100%, please indicate "There are no other 10% or greater ownership".)

Name: Multiphone Latin America Inc.  
Owner Type: Institutional Owner of MTS Telco  
Ownership: 100% owner of Applicant  
Principal Business: Telecommunications  
Citizenship: US Entity (a Florida Domestic Corporation)  
Contact: Jorge Fernandez, Financial Director of Multiphone Latin America Inc.  
Address: 2051 NW 112th Avenue, Suite 114, Miami, FL 33172  
Telephone: (305) 357-2139  
Facsimile: (305) 436-8990

Ownership of Multiphone Latin America Inc.

Name: Orlando G. Padron  
Owner Type: Individual Owner  
Ownership: 100% owner of Multiphone Latin America Inc.  
Principal Business: Telecommunications  
Citizenship: Venezuela  
Address: 2051 NW 112th Avenue, Suite 114, Miami, FL 33172  
Telephone: (305) 357-2139  
Facsimile: (305) 436-8990

---

**In Attachment 1, respond to paragraphs (d), (e)(4) and (g) of Section 63.18.**

**Section 63.18 paragraph (d)**

*Applicant has not previously received authority under Section 214 of the Act.*

**Section 63.18 paragraph (e)(4)**

*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.*

**Section 63.18 paragraph (g)** “If the applicant is seeking facilities-based authority under § 63.18(e)(3) and its facilities are listed in Section 1.1306 of the Commission’s rules, an environmental assessment as described in Section 1.1311 of the Commission’s rules is required upon filing”.

Applicant is not seeking facilities-based authority under paragraph (e)(4) of Section 63.18. Applicant is seeking facilities-based authority eligible for streamline processing since its facilities (mainly circuit switch and IP based soft switch) are exempt from the Commission’s environmental assessment requirements, pursuant to Section 1.1306 of the Commission’s rule.

The applicant facilities would be categorically excluded from environmental processing. Applicant’s facilities individually and cumulatively have no significant effect on the quality of the human environment. Applicant would house its facilities within existing structures located at its listed addressed and existing collocation sites within the United States.