## **U.S. Department of Justice**

National Security Division

Foreign Investment Review Staff

Washington, D.C. 20530

April 11, 2016

By Electronic Filing

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

## Re: IP To Go, LLC., File No. ITC-214-20090508-00208

Dear Ms. Dortch:

The Department of Justice ("DOJ") hereby notifies the Federal Communications Commission ("FCC") of the believed dissolution of IP To Go, LLC. ("IPTG") and the corresponding inability of IPTG to comply with the conditions of its international telecommunications certificate granted on December 29, 2011 (authorization file number **ITC-214-20090508-00208**) (DA No. 11-2072). Given such inability, DOJ requests that the FCC terminate, declare null and void and no longer in effect, and/or revoke IPTG's current authorization, file number **ITC-214-20090508-00208**.

Prior to IPTG receiving the above-identified certificate on December 19, 2011, DOJ expressly conditioned its non-objection to the grant of international 214 telecommunications authorities on "the [FCC] condition[ing] its approval on the agreement of [IPTG] to abide by the commitments and undertakings set forth in letter which was attached to the Agencies' petition (See Attachment 1 – (Pet. To Adopt Cond.) to Auth. And Licenses (dated November 21,2011)). As stated in the public notice describing the grant of the above-referenced certificate (DA No. 11-2072), the FCC granted DOJ's request and conditioned IPTG's authority to provide facilities-based service in accordance with Section 63.18(e)(1) of the FCC's rules, and also to provide resale service in accordance with Section 63.18(e)(2) of the FCC's rules, on IPTG "abiding by the commitments and undertakings set forth in the December 5, 2011 Agreement from the president of IPTG to Assistant Attorney General, National Security Division, US Department of Justice." (See Attachment 1 (Public Notice, DA No. 11-2072) (Dec. 29, 2011)).

Since January 2016, DOJ has been unable to contact IPTG on the telephone numbers listed in its FCC application and has been unable to find any other working telephone numbers for the company through open source research. Additionally, DOJ contacted IPTG via e-mails to <u>rmandini@iptogo.net</u> and <u>telecomfederal@regbackoffice.com</u>, the e-mail addresses provided on the company's FCC 214 application, several times since January 2016, with no response.

ITPG's customer inquiries telephone number noted on its Form 499 Filer application, 877-478-6467, is disconnected as well as its Agent for Service of Process telephone number, 305-856-9433. DOJ left several voice mail messages over a three month period from January through March 2016 with IPTG's two telephone numbers, 202-241-8231 and 435-203-3041, which were provided on its Form 499 Filer application. Both numbers are in service with non-descript voice mail greetings and no calls were returned from IPTG representatives. Further research identified three additional telephone numbers for IPTG at three locations that are now disconnected numbers. These disconnected numbers include: 1) 305-722-6640 at 15590 NW 15<sup>th</sup> Ave., Miami, FL 33169; 2) 305-856-7755 at 175 7<sup>th</sup> St., Suite 1107, Miami, FL and 3) 305-856-9433 at 1801 Coral Way, Suite 300, Miami, FL 33145-2784. IPTG listed the telephone number, 305-477-7580, on its' FCC 214 application which belongs to Maldonado Law Group but was listed on its application as belonging to Alonzo Bevene from the Regulatory Back Office, Inc. Mr. Maldonado answered this number and advised the DOJ representative in a February 2016 telephone conversation that the firm is no longer on retainer with IPTG and has no forwarding information for the company. The Florida Department of State Division of Corporations lists IPTG as an active company as of 05/22/2007 with a document number of L07000037848, an FEI/EIN number of 20-8823074 and mailing address of 6742 NW 108 Ave., Parkland, FL 33076. DOJ research found this address to be a business address for Hitstay, a travel company, also owned by IPTG business owner, Ricardo Mandini. No telephone number was found for Hitstay. Given all of the above information, we believe that the company is neither providing services pursuant to authorization file number ITC-214-20090508-00208 nor still in existence.

DOJ respectively submits to the FCC that IPTG is unable to comply with its commitments made in its letter dated November 21, 2011 letter and signed December 5, 2011, to Assistant Attorney General, National Security Division, US Department of Justice and upon which the Agencies gave their non-objection to the granting of authorities and the conditions of the FCC's December 29, 2011, grant of an international telecommunications certificate. DOJ requests that the FCC terminate, declare null and void and no longer in effect, and/or revoke the international telecommunications certificate issued to IPTG, authorization file number **ITC-214-20090508-00208**.

Thank you for your consideration.

Sincerely,

\_\_\_\_s/Richard Sofield\_\_\_\_\_ Richard Sofield Director, Foreign Investment Review Staff National Security Division U.S. Department of Justice

cc: Denise Coca Chief, Telecommunications and Analysis Division International Bureau, FCC Denise.coca@fcc.gov

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