

April 20, 2018

Via Electronic Filing

Marlene H. Dortch Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, D.C. 20554

Re: Notice of Discontinuance of Service Pursuant to 47 C.F.R. § 63.19

Dear Ms. Dortch:

Pursuant to Section 214(a) of the Communications Act of 1934, as amended, 47 U.S.C. § 214(a), and Section 63.19 of the Commission's rules, 47 C.F.R. § 63.19, GTI Corporation d/b/a GTI Telecom ("GTI"), a member of the Globe group of companies, hereby notifies the Commission of a revision to its planned discontinuance of DUO USA, a calling service on the U.S.-Philippines route that provides international long-distance voice calls. The revised discontinuance notice is that DUO customers who registered for the service through prepaid calling cards will only be able to use their cards until June 15, 2018. GTI's notice to customers provides a list of possible alternative companies on this competitive route (see attached).

As detailed in the original March 28th notice to the Commission, DUO USA assigns a U.S. landline number to the Globe or TM (Globe's mobile brand) number in the Philippines and thereby allows U.S. customers to make calls to the Philippines by dialing the assigned local U.S. number. The DUO USA service offers 7-day, 30-day, 90-day and 180-day plans. Subscriptions to the DUO USA service are available via online subscription (through debit or credit card) or by purchasing DUO USA prepaid cards (only for the 30-day plan).

Please note that DUO USA is not a subscription-based service where subscribers are automatically charged for the service. Subscription to the DUO USA service is terminated upon expiration of the plan term and can be renewed at the option of the subscriber. As notified to the Commission and its DUO customers in March, GTI stopped selling the DUO USA prepaid cards on March 31, 2018. GTI's original notice stated that subscribers would be allowed to use their DUO USA prepaid cards until July 31, 2018, but this has changed. GTI will allow subscribers to continue to use their DUO USA prepaid cards until June 15, 2018. For subscribers who registered on-line for longer plans, the service will continue to be available until September 27, 2018. As notified last month, DUO USA online subscriptions will be available up until April 30, 2018, with service available until September 27, 2018.

GTI's discontinuance of the DUO USA service will affect customers located in all 50 U.S. States. GTI provides international service pursuant to International 214 Authorization Number

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ITC-214-20090831-00403.¹ GTI will provide notification about this planned discontinuance via email to existing subscribers, information on its website (<u>www.globemobile.us</u>), and its Facebook page (GTI Telecom – Globe USA).

If you have any questions, please do not hesitate to contact me at (202) 730-1314, or tpaoletta@hwglaw.com.

Respectfully submitted,

Patricia Paoletta

Counsel to GTI Corporation

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Attachment

Cc: Thomas Sullivan

¹ GTI is not relinquishing this international Section 214 authorization, and will continue to provide other international services.

LETTER:

Dear Valued DUO USA subscriber,

We're thankful that you've allowed us to help you call your loved ones in the Philippines with ease and comfort.

As one of our valued DUO USA subscribers, we wish to inform you that GTI recently had a review of its products and services as well as the calling needs and behavior of our customers like you. One of the key takeaways from this review is that the customer's needs are changing and there is a great need for a better service.

As previously notified, starting April 1, 2018, GTI no longer is selling Duo USA Prepaid Cards. In addition, DUO USA Online subscription will no longer be available starting April 30, 2018. However, DUO USA Prepaid cards will be available for subscription until June 15, 2018 for those who have purchased DUO USA prepaid cards prior to April 1, 2018. After September 27, GTI will no longer service DUO USA who registered on-line.

But, don't worry! As part of our commitment to give you the best possible experience to stay in touch with your loved ones in the Philippines, we have partnered with some of the best local providers to ensure ease and availability of our calling services in the U.S.

While DUO has been a great service, GTI remains true to its commitment to provide wonderful experiences and part of that is coming up with a better service that enables you to have a more affordable and flexible way of calling your loved ones in the Philippines.

In lieu of Duo USA, we are offering various other calling partnership with several providers. Among them are the following:

Name of Service	Type	Features	Website
Impact Telecom	Access Dialing with Landline Option	1,500 minutes to Globe Group Network, Valid for 30 days, including unlimited calling within the US	
Bankai (Call n Roam) - Telebabad Kabayan	Prepaid Card	1,500 minutes (30 day plan) 500 minutes (7 day plan) Can call up to 5 Globe / TM numbers in the Philippines No internet or mobile data required	https://www.callnroam.com/internation al-calling/unlimited#pinoy
Obie Tel LLC - Globie App	Mobile Phone App	1,500 minutes (30 day plan) 500 minutes (7 day plan) Can call up to 5 Globe / TM numbers in the Philippines Fund Transfer Capability	http://globie.net/#
Lunex	Access Dialing	1,500 minutes (30 day plan) 500 minutes (7 day plan) Can call up to 5 Globe / TM numbers in the Philippines 1-Click Max (Pay as you go)	https://www.lunextelecom.com/ https://1clicmax.com/
Ultra Mobile	Mobile Plan Add On	1,500 minutes to 5 Globe / TM numbers in the Philippines Unlimited Calling within the US	https://www.ultramobile.com/globe- unlimited/
Vodi App	Mobile Phone App	1,500 minutes (30 day plan) 500 minutes (7 day plan) Can call up to 5 Globe / TM numbers in the Philippines Fund Transfer Capability	https://vodi.io/
Vonage	Landline	3,000 minutes (30 day plan) to Globe / TM numbers in the Philippines Unlimited Calling within the US	https://www.vonage.com/personal/phon e-plans/vonage-3000-globe-philippines

All these services allow you to call your loved ones with ease and flexibility.

If you have any other questions, you can call our dedicated Customer Service team at 1-888-999-1068.

Thank you and let's create a truly wonderful world!

Yours, GTI Corporation