

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

In the Matter of)
)
GTI Telecommunications)
) File No. ITC-214-20090831-00403
Application for authorization under Section)
214 of the Communications Act of 1934, as)
amended)
)
)
)
)

**PETITION TO ADOPT CONDITIONS TO
AUTHORIZATIONS AND LICENSES**

The Department of Justice (“DOJ”)(“the Agency”) submits this Petition to Adopt Conditions to Authorizations and Licenses (“Petition”), pursuant to Section 1.41 of the Federal Communications Commission (“Commission”) rules.¹ Through this Petition, the Agency advises the Commission that it has no objection to the Commission approving the authority sought in the above-referenced proceeding, provided that the Commission conditions its approval on the assurance of GTI Corporation to abide by the commitments and undertakings set forth in the January 15, 2010 Letter of Assurances (“LOA”), which is attached hereto.

In the above-referenced proceeding, the Applicant petitioned the Commission for authority under Section 214 of the Communications Act of 1934, as amended, to provide international resold and facilities-based services between the United States and permissible international points except Singapore, Australia, Bangladesh, India, Indonesia, and Pakistan.

¹ 47 C.F.R. § 1.41.

The Commission has long recognized that law enforcement, national security, and public safety concerns are part of its public interest analysis, and has accorded deference to the views of other U.S. government agencies with expertise in those areas. *See In the Matter of Comsat Corporation d/b/a Comsat Mobile Communications, etc.*, 16 FCC Rcd. 21,661, 21707 ¶ 94 (2001).

After discussions with representatives of the Applicant in connection with the above-referenced proceeding, the Agency has concluded that the additional commitments set forth in the LOA will help ensure that the Agency with responsibility for enforcing the law, protecting the national security, and preserving public safety, can proceed appropriately to satisfy those

responsibilities. Accordingly, the Agency advises the Commission that it has no objection to the Commission granting the application in the above-referenced proceeding, provided that the Commission conditions its consent on compliance by GTI Corporation with the LOA.

Respectfully submitted,

/S/ Richard C. Sofield
Richard C. Sofield
U.S. Department of Justice
Director - Foreign Investment Review Staff
National Security Division
950 Penn. Avenue, N.W. Suite 6150
Washington, D.C. 20530

February 22, 2010