

GTI Corporation

1209 Orange Street
Wilmington, DE 19801
United States of America

15 January 2010

Assistant Attorney General
National Security Division
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530

Re: Pending application by GTI Corporation for authorization under Section 214 of the Communications Act of 1934, as amended

Sirs:

This letter outlines the commitments made by GTI Corporation (“GTI”) to the U.S. Department of Justice (“DOJ”) in order to address national security, law enforcement, and public safety concerns raised with regard to the GTI application to the Federal Communications Commission (“FCC”) for authority to provide international facilities-based and resold services to permissible international points under Section 214 of the Communications Act of 1934, as amended.

GTI, a newly launched U.S. corporation, is a wholly-owned subsidiary of GTI Business Holdings Inc., a Philippine corporation. GTI is seeking an authorization from the FCC under Section 214 of the Communications Act of 1934, as amended, to provide international facilities-based and resold services between the United States and all international points except Singapore, Australia, Bangladesh, India, Indonesia and Pakistan. GTI seeks to provide international direct dial (IDD) calling service to U.S. consumers.

GTI agrees that, for all GTI customer billing records, subscriber information, and any other related information used, processed, or maintained in the ordinary course of business relating to communications services offered in the United States (“U.S. Records”), GTI will store either originals or copies of originals in the United States and make such U.S. Records available in response to lawful U.S. process.¹ For these purposes, U.S. Records shall include information subject to disclosure to a U.S. Federal

¹ This statement does not supercede or replace GTI’s other duties to comply with any applicable FCC requirements and regulations. GTI acknowledges that it must also meet any other applicable FCC regulatory requirements, including but not limited to any requirements related to the storage and protection of Customer Proprietary Network Information (CPNI).

or state governmental entity under the procedures specified in Sections 2703(c) and (d) and Section 2709 of Title 18 of the United States Code. GTI also agrees to ensure that U.S. Records are not made subject to mandatory destruction under any foreign laws.

We understand that, upon execution of this letter by an authorized representative or attorney for GTI, DOJ shall notify the FCC that they have no objection to the FCC's grant of the GTI application filed with the FCC.

Sincerely,

A handwritten signature in black ink, appearing to read "Gil B. Genio".

Gil B. Genio
President