

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of                     )  
  )  
Dinamica Telecom, Inc.            )   File No. ITC – 214-20100709-00277

Comments and Request to Remove From Streamlined Processing, or  
in the Alternative, to Deny the Application

TO: Chief, International Bureau

China Telecom (Americas) Corporation (“CT Americas”) submits the following Comments and request to remove from streamlined processing, or in the alternative, to deny the application (the “Application”) of Dinamica Telecom, Inc. (“Dinamica”). The Application was placed on public notice on August 6, 2010 for streamlined processing.<sup>1</sup>

CT Americas has been a licensed provider of international telecommunications services since 2002.<sup>2</sup> It provides facilities-based and resale services between the United States, China and numerous other destinations. CT Americas is interested in the application of Dinamica since it provided service to Dinamica between September 2008 and June 2009, when the service was terminated by Dinamica. CT Americas is concerned that grant of a license to Dinamica would not be in the public interest because Dinamica has not demonstrated financial capability to provide service. Dinamica filed for bankruptcy in the Federal Bankruptcy Court for the Central

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<sup>1</sup> Public Notice, Report [TEL:024475](#) (Aug. 6, 2010). The Commission’s rules do not specify a specific procedure for filing comments or oppositions to streamlined applications. Therefore, to the extent necessary to accept this pleading, CT Americas requests a waiver of any applicable rules to allow the filing of this pleading or that the Commission treat this pleading as an Informal Request for Commission Action pursuant to Section 1.41 of the Commission’s Rules, 47 C.F.R. Section 1.41.

<sup>2</sup> ITC-214-20010613-00346 (July 6, 2001) and ITC-214-20020716-00371 (Aug. 7, 2002).

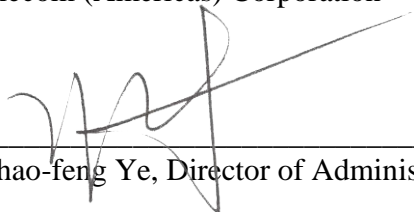
District of California in May 2010.<sup>3</sup> More important, Dinamica appears to have been reselling the international service it purchased from CT Americas internationally without a license. The service that CT Americas provided to Dinamica was a circuit between the Philippines and Miami, Florida, which Dinamica resold to an end user.

The Commission should remove the Application from streamlined processing until it has an opportunity to investigate further whether the public interest will be served by granting Dinamica a license. In the alternative, the Commission should deny the application in the absence of sufficient facts to make a well-founded decision.

Respectfully submitted,

China Telecom (Americas) Corporation

By:



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Zhao-feng Ye, Director of Administration

Dated: August 19, 2010

## CERTIFICATE OF SERVICE OF PROCESS

I hereby certify that on June 19, 2010, I caused a copy of the foregoing Comments and Request to Remove Streamline Processing or, Alternatively, to Deny the Application, Application No. ITC-214-20100709-00277, to be served by courier service, or email as indicated below, to the following:

Electronic Filing  
Marlene H. Dortch  
Secretary  
Federal Communications Commission

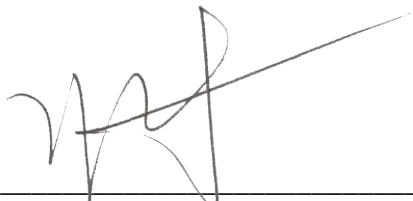
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