

February 7, 2011


David S. Kris  
Assistant Attorney General  
National Security Division  
US Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530  
ttelecom@usdoj.gov

Re: Pending application by Rules Telecomm, LLC for authorization under  
Section 214 of the Communications Act of 1934, as amended  
FCC ITC-214-20100719-00298

Sir:

This letter outlines the commitments made by Rules Telecomm, LLC (Rules) to the US Department of Justice (DOJ) in order to address national security, law enforcement, and public safety concerns raised with regard to the Rules application to the Federal Communications Commission (FCC) for authority to provide international resold services to all international points under Section 214 of the Communications Act of 1934, as amended.

Rules is a US corporation seeking an authorization from the FCC to provide international global or limited global facilities-based authority, and global or limited global resale authority (47 C.F.R. § 63.18(e)(1) and § 63.18(e)(2)) to all international points under Section 214 of the Communications Act of 1934, as amended.

 Rules agrees that it will inform DOJ of its lawful interception capabilities status within 30 days of the grant of its authority. Rules agrees that, for all Rules customer billing records, subscriber information, and any other related information used, processed, or maintained in the ordinary course of business relating to telecommunications services offered in the US (US Records), Rules will store either originals or copies of originals in the US and make such records available in response to lawful US process.<sup>1</sup> For these purposes, US Records shall include information subject to disclosure to a US Federal or state governmental entity under the procedures specified in Sections 2703(c) and (d) and Section 2709 of Title 18 of the US Code. Rules also agrees to ensure that US Records are not made subject to mandatory destruction under any foreign laws. The location of the US Records storage location will be provided to DOJ at least 30 days in advance of the time in which Rules anticipates generating US Records.

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<sup>1</sup> This statement does not supersede or replace Rules' other duties to comply with any applicable FCC requirements and regulations. Rules 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 CPNI.

Rules agrees that it will not, directly or indirectly, disclose or permit disclosure of or access to US Records or domestic communications or any information (including the content of communication) pertaining to a wiretap order, pen/trap order, subpoena or other lawful demand by a US law enforcement agency for US Records, to any person if the purpose of such disclosure or access is to respond to the legal process or request on behalf of a non-US government without first satisfying all pertinent requirements of US law and obtaining the express written consent of DOJ, or the authorization of a court of competent jurisdiction in the US. The term "non-US government" means any government, including an identified representative, agent, component or subdivision thereof, that is not a local, state or federal government in the US. Any such requests of legal process submitted by a non-US government to Rules shall be referred to the DOJ as soon as possible, and in no event later than 5 business days after such request or legal process is received by or known to Rules, unless the disclosure of the request or legal process would be in violation of US law or an order of a court of the US.

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

Sincerely,

Rules Telecomm, LLC

Date: February 8<sup>th</sup> 2011  
By: [Signature]  
Name: Cristopher Gonzalez  
Title: President