

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

In re Application of)	
)	
Tata Telecom INC)	File No. ITC-214-20100907-00357
)	
To Provide International Facilities-Based)	
and Resold Services to All International)	
Points)	

PETITION TO DENY

Tata Communications (America) Inc. and
Tata Communications Services (America) Inc.

September 25, 2010

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SUMMARY

Tata Communications (America) Inc. and its sister company, Tata Communications Services (America) Inc. (“Petitioners”) urge the Commission to deny the application for Section 214 international service authority submitted by “Tata Telecom INC” (“214 Applicant” or “Tata Telecom INC”). Petitioners submit that the 214 Applicant has engaged in a variety of unlawful and noncompliant behaviors that demonstrate that it does not meet even the basic character and other qualifications for an applicant for Commission authority and therefore a grant of the instant application would not serve the public interest, convenience and necessity.

In particular, 214 Applicant has been using the TATA trademark in bad faith for the purpose of deceiving the public into believing it is affiliated with the Tata Group to which Petitioners belong. This fact was adjudicated before and confirmed by the World Intellectual Property Organization (“WIPO”) Administrative Panel. Further, the Commission should deny the instant application because, if its own representations in the WIPO proceedings and Federal District Court litigation are true, 214 Applicant has been violating the Act and the Commission’s rules by unlawfully providing international service in the United States without Commission authority for several years.

Finally, the application should be denied because the information in 214 Applicant’s submission is incomplete, inaccurate, and lacks candor. 214 Applicant has failed to disclose its relationship with multiple foreign affiliates and failed to disclose the citizenship of its principal owner.

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To: Chief, International Bureau

PETITION TO DENY

Tata Communications (America) Inc. and its sister company, Tata Communications Services (America) Inc. (“Petitioners”), hereby file this Petition to Deny the above-captioned application of “Tata Telecom INC”¹ (“214 Applicant” or “Tata Telecom INC”), for authorization to provide international facilities-based and resold services to all international points pursuant to Section 214 of the Communications Act of 1934, as amended (the “Act”).² 214 Applicant “Tata Telecom INC” is a company completely unrelated to Petitioners. 214 Applicant’s Section 214 application should be denied because grant of Section 214 authority to a company that lacks the requisite character qualifications, has violated and continues to violate legal and regulatory requirements, and has failed to submit a complete, accurate and truthful application would not

¹ Petitioners believe that the moniker “Tata Telecom INC” is not 214 Applicant’s actual legal or corporate name, its registered business name, or even a sanctioned version of its business name under Canadian law. 214 Applicant’s legal name is “Toronto Asia Tele Access Telecom Inc.,” which registered for the business name of “Tata Telecom” (not “Tata Telecom INC”) in the province of Ontario, Canada. *See Business Names Report*, Ministry of Government Services, Province of Ontario (Sep. 20, 2010). Attached hereto as Exhibit 1. Moreover, 214 Applicant’s use of the word “INC” in conjunction with its business name “Tata Telecom” is *prohibited* by the Canada Business Corporations Act (the “CBCA”). Pursuant to Section 10(6) of the CBCA, a corporation may carry on business under, or identify itself by, a name other than its corporate name if that other name does not contain either the words “Limited,” “Incorporated,” “Corporation” or their corresponding abbreviations.

² 47 U.S.C. § 214.

“serve the public interest, convenience, and necessity.” Accordingly, Petitioners respectfully show the following:

**I. 214 APPLICANT LACKS REQUISITE CHARACTER QUALIFICATIONS FOR GRANT:
214 APPLICANT “TATA TELECOM INC” HAS BEEN USING THE TATA TRADEMARK IN
BAD FAITH AND WITH THE INTENT OF DECEIVING CONSUMERS**

Petitioners Tata Communications (America) Inc. and Tata Communications Services (America) Inc. have, for some time, been authorized pursuant to Section 214 of the Act to provide international facilities-based and resold telecommunications services. Petitioners are wholly-owned³ subsidiaries of the Tata Communications Limited family of companies. The Tata Communications Limited global family of companies is one of the world’s largest wholesale international voice carriers (carrying 32 billion minutes of international voice traffic a year), operates one of the largest and most advanced global submarine cable networks, maintains connectivity to more than 200 countries across 400 Points of Presence (“PoPs”), and operates one of the largest Tier-1 global Internet backbones.⁴ Tata Communications Limited is listed on the Bombay Stock Exchange, the National Stock Exchange of India, and its ADRs are listed on the New York Stock Exchange (NYSE: TCL).

The Tata Communications Limited global family of companies is also a part of the greater, global Tata family of companies (the “Tata Group”). The Tata Group is headquartered in India, dates from 1868, and spans many industry sectors. The Tata Group’s revenues exceed \$70 billion USD annually, and its companies have a shareholder base of 3.2 million. In addition to the Tata Communications Limited family of companies, major companies in the greater Tata Group include Tata Steel, Tata Motors (which developed the \$2,500 Tata Nano, and includes

³ Tata Communications (America) Inc. is an indirect subsidiary of Tata Communications Limited; Tata Communications Services (America) Inc. is a direct subsidiary of Tata Communications Limited.

⁴ See generally FY10 Earnings & Strategy Update to Shareholders (Aug. 6, 2010), available at <http://www.tatacommunications.com/downloads/investors/analyst/24TH-AGM-MD-Presentation.pdf>; About Tata Communications, <http://www.tatacommunications.com/about/overview.asp> (last visited Sep. 21, 2010).

Jaguar and Land Rover), Tata Consultancy Services, Tata Power, Tata Chemicals, Tata Tea (which includes Tetley Tea and Good Earth Tea), and Indian Hotels (which include the Taj hotels).⁵

Petitioners and Tata Sons Limited (“Tata Sons”)⁶ -- the company that owns the “TATA” trademark – became aware of 214 Applicant “Tata Telecom INC’s” use of the TATA trademark, an extremely valuable⁷ and fiercely-guarded trademark, approximately two years ago when Petitioners’ customers contacted Petitioners regarding 214 Applicant’s unauthorized use of the TATA trademark. Thereafter, in May 2009, Tata Sons began ongoing proceedings regarding 214 Applicant’s unauthorized use of the TATA trademark.

Petitioners understand that the Commission is not tasked with resolving commercial trademark disputes and Petitioners submit that those issues have been decided and are the subject of proceedings in other fora. 214 Applicant’s character and efforts to use the Commission’s processes to deceive consumers is, however, relevant to the question of whether grant of its Section 214 application would serve the public interest, convenience, and necessity. Petitioners, as well as the World Intellectual Property Organization (“WIPO”) Administrative Panel (which

⁵ Tata Group Profile, <http://www.tatacommunications.com/about/tatagroup.asp> (last visited Sep. 21, 2010).

⁶ Tata Sons is the registered owner of the Tata trademark and the principle investment holding company for the Tata Group. Tata Sons and affiliated companies are majority owners of the Tata Communications family of companies. About 66% of the equity capital of Tata Sons is held by philanthropic trusts that have created national institutions for science and technology, medical research, social studies and the performing arts. The trusts also provide aid and assistance to non-government organizations working in the areas of education, healthcare and livelihoods.

⁷ Brand Finance, a UK-based consultancy firm, recently valued the Tata brand at \$11.2 billion and ranks it among the Top 100 brands in the world. *See* The Brand Finance Global 500, *available at* http://www.brandirectory.com/league_tables/table/global_500#exec_summary (last visited Sep. 21, 2010). Bloomberg BusinessWeek ranks the Tata Group amongst the "50 Most Innovative Companies," and the Reputation Institute, USA, rated Tata among the top 200 most reputable companies in the world and among the top 20 in its 2006, 2008, and 2009 rankings. *See* The 50 Most Innovative Companies 2010, *available at* http://www.businessweek.com/interactive_reports/innovative_companies_2010.html?chan=magazine+channel_spec (last visited Sep. 21, 2010); Global Reputation Pulse Database -Top 200, *available at* <http://www.reputationinstitute.com/knowledge-center/global-pulse-data> (last visited Sep. 21, 2010) (2006-2009 rankings).

ordered 214 Applicant to turn over the domain name “tata-telecom.com” to Tata Sons), believe that 214 Applicant “Tata Telecom INC” chose to use the name “Tata” with the intent of deceiving consumers into believing that it had some connection to the Tata family of companies to which Petitioners belong.⁸ This act (and others, discussed *infra*) calls into question 214 Applicant’s character qualifications and demonstrates that a grant of its application for Section 214 authority should be denied, as it would not “serve the public interest, convenience, and necessity.”

In reaching its decision in favor of Tata Sons, the WIPO Administrative Panel found that “Tata Telecom INC” and “Mr. Singh” (the same Mr. Manmohan Singh Thamber that is listed as 214 Applicant’s sole shareholder and contact) lacked credibility, had no legitimate rights to use the TATA trademark, but used it anyway in bad faith, saying:

. . . it is a virtually inescapable conclusion that the Respondent [214 Applicant] was aware of the Complainant when registering the disputed domain name [in 2003]. For the Respondent to assert that it has “sister companies” in India . . . , while denying any knowledge on its part of the Complainant and the Complainant’s well known TATA mark, simply defies credulity. Based on all of the foregoing, the Panel draws a strong inference that . . . the Respondent in fact registered the disputed domain name with the aim of trading on the strength and reputation of the Complainant’s mark.

...

...when a domain name is so obviously connected with a Complainant, its very use by a registrant with no connection to the Complainant suggests “opportunistic bad faith.” ... Under the circumstances presented here, the Panel is firmly of the opinion that the Respondent has used the disputed domain name in bad faith to attract Internet users to the Respondent’s website for commercial gain, by creating a likelihood of confusion....⁹

⁸ *Tata Sons Limited v. TATA Telecom Inc/Tata-telecom.com, Mr. Singh*, WIPO Arbitration and Mediation Center, Case No. D2009-0671 at 10 (Sep. 1, 2009) (ordering Applicant to turn over the domain name “tata-telecom.com” to Tata Sons) (“*WIPO Arbitration Decision*”). Attached hereto as Exhibit 2.

⁹ *WIPO Arbitration Decision* at 8, 9-10.

On September 1, 2009, the WIPO Administrative Panel ordered 214 Applicant herein to relinquish the Tata domain name.¹⁰ However, 214 Applicant avoided the immediate implementation of the WIPO Arbitration Decision by suing Tata Sons in a U.S. federal court.¹¹

II. 214 APPLICANT CLAIMS TO HAVE PROVIDED INTERNATIONAL SERVICE WITHOUT SECTION 214 AUTHORIZATION IN THE UNITED STATES FOR YEARS IN BLATANT DISREGARD OF THE ACT AND COMMISSION REQUIREMENTS

The Act and Commission's rules require that entities proposing to provide international common carrier telecommunications services must obtain authority under Section 214 *before* commencing services. 214 Applicant has apparently flouted this statutory and regulatory obligation and claims to have operated as an international common carrier for years without authority. Such operation is unlawful under the Act and Commission's rules.

During the WIPO and federal court proceedings regarding 214 Applicant's unauthorized use of the TATA trademark in the United States in the field of telecommunications, 214 Applicant has made numerous statements regarding its alleged provision of telecommunications services in the U.S. In the WIPO proceeding, for instance, 214 Applicant asserted that it "is continuously and interruptedly [sic] using the mark TATA for providing telecommunications services in Europe, Canada and the United States of America since 2002"¹² Similarly, 214 Applicant represented to a U.S. federal court in September 2009 that it was founded in 2002 and "...provides telecommunications services, including wholesale and retail long distance services,

¹⁰ *Id.* at 10.

¹¹ *Toronto Asia Tele Access Telecom Inc. and Manmohan Singh Thamber v. Tata Sons Limited*, No. CV 09-01356 RSM (W.D. Wash. filed Sep. 24, 2009). On September 24, 2009, "Tata Telecom INC" and Mr. Singh filed a complaint against Tata Sons in the United States District Court for the Western District of Washington in order to stay the implementation of the WIPO decision. *Id.*

¹² Def.'s Response, *Tata Sons Limited v. TATA Telecom Inc/Tata-telecom.com, Mr. Singh*, WIPO Arbitration and Mediation Center, Case No. D2009-0671 at 6 (filed July 15, 2009) ("*TATA Telecom INC WIPO Arbitration Response*"). Attached hereto as Exhibit 3.

international toll free numbers, prepaid calling cards, callshop solutions, phone portal services, and CallbySMS services.”¹³

Further, in its July 12, 2010 response to interrogatories in the federal court litigation, 214 Applicant claimed that it has been offering most of its services in the United States since 2006, stating:

TATA Telecom first used its TATA TELECOM trademark in connection with its services in the United States as follows:

Prepaid calling card services – At least as early as June 2006
International toll free numbers – 2006
Callshop solutions – 2006
Phone portal – 2006
CallbySMS – 2006
Information technology support services – 2006
Wholesale minutes trading – 2009.¹⁴

214 Applicant also stated in its response to interrogatories, “Tata Telecom’s current and prospective customers for its prepaid calling card services are ethnic and minority populations that reside within the United States. Its wholesale services are offered to telecommunications companies (*e.g.* WTN Group and Ping Yin Communications).”¹⁵

On May 27, 2010, 214 Applicant’s counsel, as part of document production in the ongoing federal litigation, produced invoices dating from May 2006 that 214 Applicant sent to U.S. customers for calling cards.¹⁶ Thereafter, on September 2, 2010, when asked to produce a U.S. calling card, 214 Applicant’s counsel produced the Tata Telecom calling card attached hereto as Exhibit 7.

¹³ Complaint, *Toronto Asia Tele Access Telecom Inc. and Manmohan Singh Thamber v. Tata Sons Limited*, No. CV 09-01356 RSM at ¶ 6 (W.D. Wash. filed Sep. 24, 2009) (“*Tata Telecom INC District Court Complaint*”). Attached hereto as Exhibit 4. *See also id.* at ¶¶ 17, 18.

¹⁴ Tata Sons Limited’s First Interrogatories and Plaintiff’s Answers Thereto, *Toronto Asia Tele Access Telecom Inc. and Manmohan Singh Thamber v. Tata Sons Limited*, No. CV 09-01356 RSM at 10 (W.D. Wash. filed July 12, 2010) (response to Interrogatory No. 7) (“*Tata Telecom INC Response to Interrogatories*”). Attached hereto as Exhibit 5.

¹⁵ *Id.* at 10 (response to Interrogatory No. 9).

¹⁶ Exhibit 6, attached hereto.

In addition to representations made in the WIPO and federal court proceedings, 214 Applicant maintains a number of web sites advertising its services as including international services provided to U.S. customers.¹⁷ This blatant disregard for applicable legal and regulatory requirements should not now be condoned with a grant of this application. Through its illegal conduct, 214 Applicant has attempted to escape Commission scrutiny, avoid the right of consumers to bring complaints, and failed to satisfy other important obligations that law-abiding carriers satisfy. Thus, the Commission should deny the pending application.

III. 214 APPLICANT’S APPLICATION IS INCOMPLETE, INACCURATE, AND LACKS CANDOR

Applicants have an obligation to submit complete, accurate, and truthful information to the Commission.¹⁸ 214 Applicant has failed to meet these basic requirements and therefore its application should be denied.

214 Applicant filed its Section 214 application in the name of “Tata Telecom INC.” As discussed in note 1, *supra*, “Tata Telecom INC” does not appear to be 214 Applicant’s legal or corporate name, its registered business name, or a form of its name permissible under Canadian law.

¹⁷ 214 Applicant offers its services to U.S. customers through several web sites, including www.tata-telecom.com, www.tataring.com, and www.mygloballine.com. *See, e.g.*, <http://www.mygloballine.com/index.php> (offering origination from the United States for “calls to” other countries). Attached hereto as Exhibit 8, p. 1; <http://www.mygloballine.com/buyonline.php> (instructing customers to click on the country where they are located to purchase calling cards and including an American flag for U.S. customers). Attached hereto as Exhibit 8, p. 2; <http://www.mygloballine.com/card.php?id=223> (showing various “Tata Telecom” calling cards for purchase after one clicks on the American flag icon, and specifying “USD” denominations). Attached hereto as Exhibit 8, p. 3; <http://www.mygloballine.com/contact.php> (listing Tata Telecom and Mr. Singh (“M S Thamber”) as a contact, along with contacts in a number of other countries, including for U.S. customers). Attached hereto as Exhibit 8, p. 4.

¹⁸ Applicants are under an obligation to maintain the continuing accuracy and completeness of information furnished in a pending application pursuant to Section 1.65 of the Commission’s rules. 47 C.F.R. § 1.65. *See also* Advanced Business Communications, Inc.; In the Domestic Public Cellular Telecommunications Radio Service for the Waco, Texas MSA, *Order on Recon.*, 2 FCC Rcd 580 at ¶ 7 (rel. Jan. 28, 1987) (“The Commission must depend on the accuracy and truthfulness of its licensees’ representations. A breach of that trust is grounds for character disqualification. Parties and applicants are strongly cautioned to be completely honest in their dealings with this Commission.”) (citation omitted).

214 Applicant has also failed to make required disclosures regarding its affiliations with foreign carriers. Question 11 of the Section 214 Application reads:

If the Applicant is a foreign carrier ... provide in Attachment 1 the information and certifications required by Section 63.18(i) through (m).

Section 63.18(i) requires as part of the 214 application:

(i) A certification as to whether or not the applicant is, or is affiliated with, a foreign carrier. The certification shall state with specificity each foreign country in which the applicant is, or is affiliated with, a foreign carrier.¹⁹

“Tata Telecom INC” responded to Question 11(i) by stating:

Tata Telecom Inc certifies that it is not affiliated with any foreign *facilities-based* Carriers or US dominant carriers. (Emphasis added).

Question 11 does not ask foreign carriers, such as 214 Applicant, for information limited to *facilities-based* foreign carrier affiliates. 214 Applicant claims to be a foreign carrier affiliated with foreign carriers in at least four other countries as it claims on its web site to have its own facilities (PoPs) in over a dozen countries around the world.²⁰ As noted above, 214 Applicant claimed in its WIPO arbitration proceeding Response that it had been providing continuous telecommunications services in Europe, Canada and the United States of America since 2002.”²¹

In the ongoing federal litigation, 214 Applicant similarly alleges that it “was the first to adopt and use TATA TELECOM as a trademark in connection with telecommunications services in the United States, Canada, Australia, New Zealand, and the European Union.”²² In its July 2010 Response to Interrogatories, 214 Applicant stated that it “owned or controlled in whole or in part” the following non-U.S. telecommunications companies: GEO Communication AG

¹⁹ 47 C.F.R. § 63.18(i).

²⁰ Network, Map, www.tata-telecom.com (last visited Oct. 23, 2009) (interactive map displaying POPs when regions are clicked). 214 Applicant’s website explains that “TATA reaches most of its own POP’s using leased lines or satellite transmission and terminates the traffic directly into the local networks (PSTN and Mobile),” and that “. . . TATA has many international interconnects with major world-wide carriers.” Network, Overview, www.tata-telecom.com (last visited Oct. 23, 2009).

²¹ *Tata Telecom INC WIPO Arbitration Response* at 6.

²² *Tata Telecom INC District Court Complaint* at ¶ 17.

(Switzerland), TATA Telecom Ltd. (United Kingdom), TATA Com Srl (Italy), and WTN Srl (Spain).²³ 214 Applicant represented to the federal court that each provides “[r]etail and wholesale telecommunications services.”²⁴

“Tata Telecom INC’s” response to Question 11 of its application also appears incomplete in other ways. In response to Question 11, Tata Telecom INC certifies that it does not seek to provide international telecommunications services to any destination country where “... 2) Tata Telecom Inc controls a foreign carrier in that country, or 3) Any entity that owns more than 25 percent of Tata Telecom Inc, or that controls Tata Telecom Inc, in that country.” This certification appears inaccurate in light of the evidence that “Tata Telecom INC” is itself a foreign carrier and is affiliated with carriers in several foreign countries, and that “Tata Telecom INC” seeks to provide service to “all international points.”

Additionally, 214 Applicant has not, as required, clearly stated the citizenship of its sole shareholder. Question 14 of the Section 214 Application reads:

...provide the name, address, citizenship and principal business of the applicant’s ten percent or greater direct and indirect shareholders or other equity holders, and identify any interlocking directorates.

214 Applicant’s response to Question 14 lists Mr. Manmohan Singh Thamber (Mr. Singh) as the 100% shareholder. Confusingly, the response then combines Mr. Singh’s personal information with that of “Tata Telecom INC,” so that it is unclear which information applies to the shareholder, Mr. Singh, himself, and which information may apply only to “Tata Telecom INC.” For example, the application lists a “state of incorporation” for Mr. Singh. Disclosure of Mr. Singh’s citizenship is mandatory, and the Commission should require that Applicant clarify this aspect of its application. 214 Applicant’s Complaint in the ongoing federal litigation likewise

²³ *Tata Telecom’s Response to Interrogatories* at 8 (response to Interrogatory No. 1).

²⁴ *Id.*

never stated Mr. Singh's citizenship; he referred to himself as "a natural person residing in Canada."²⁵

IV. DISCUSSION

214 Applicant's continuing bad faith and deceptive use of the TATA trademark, repeated and continuing violation of the Act and Commission rules, and failure to submit complete, accurate and truthful applicant information to the Commission warrant a denial of the instant application. As discussed above, the WIPO Administrative Panel found that 214 Applicant has been using the TATA trademark in bad faith for the purpose of confusing consumers. This finding alone demonstrates that 214 Applicant does not have the requisite character qualifications for a grant of Section 214 authority. Additionally, if, as it has represented in federal court, 214 Applicant has been providing international telecommunications services in the U.S. for several years without Section 214 authority,²⁶ that further demonstrates that "Tata Telecom INC" does not have the requisite character qualifications to obtain a Section 214 authorization. As the Commission has stated:

[A]s a general matter any violations of the Communications Act, Commission rules or Commission policies can be said to have a potential bearing on character qualifications....[T]hese are matters which are predictive of licensee behavior and directly relevant to the Commission's regulatory activities. Thus, we will in the future treat violations of the Communications Act, Commission rules or Commission policies as having a potential bearing on character qualifications.²⁷

Grant of Section 214 authority to a company that has blatantly disregarded Commission requirements would not "serve the public interest, convenience, and necessity."

²⁵ *Tata Telecom INC District Court Complaint* at ¶ 2.

²⁶ Section 214 authorization would have triggered numerous compliance requirements, including filing FCC Form 499-As, annual CPNI certifications, and liability for various regulatory fees and contributions.

²⁷ Policy Regarding Character Qualifications in Broadcast Licensing; Amendment of Rules of Broadcast Practice and Procedure Relating to Written Responses to Commission Inquiries and the Making of Misrepresentations to the Commission by Permittees and Licensees, *Report, Order and Policy Statement*, 102 FCC 2d 1179, at ¶ 56 (rel. Jan. 14, 1986) ("*Broadcast Character Qualifications*").

Finally, 214 Applicant's application is incomplete, inaccurate, and lacks candor. As the courts have stated:

[T]he Commission must rely heavily on the completeness and accuracy of the submissions made to it, and its applicants in turn have an affirmative duty to inform the Commission of the facts it needs in order to fulfill its statutory mandate. This duty of candor is basic and well known.

RKO General, Inc. v. FCC, 670 F.2d 215, 232 (D.C. Cir. 1981). Just as the Commission has revoked authorizations or denied the grant of authorizations to RKO and to others²⁸ for lack of candor and misrepresentation, the Commission should deny grant of the instant application to "Tata Telecom INC" for its lack of candor in regard to its application. As the Commission has stated: "[t]he integrity of the Commission's processes cannot be maintained without honest dealing with the Commission by licensees."²⁹

V. CONCLUSION

214 Applicant has been using the TATA trademark in bad faith for the purpose of deceiving the public into believing it is affiliated with the Tata Group to which Petitioners belong. Further, although lacking the requisite Section 214 authorization, 214 Applicant claims to have provided international telecommunications in the U.S. for an extended period of time. Additionally, 214 Applicant exhibited a lack of candor with the Commission in its Section 214 application by failing to disclose its foreign affiliates, failing to disclose the state of citizenship of its only shareholder and misleading the Commission regarding its corporate name. Accordingly, 214 Applicant's Section 214 application raises substantial character issues such

²⁸ See, e.g., *Publix Network Corporation, Order to Show Cause and Notice of Opportunity for Hearing*, 20 FCC Rcd. 5857 (2005); *Marc Sobel Applicant for Certain Part 90 Authorizations in the Los Angeles Area and Requestor of Certain Finder's Preferences*; *Marc Sobel and Marc Sobel d/b/a Air Wave Communications Licensee of Certain Part 90 Stations in the Los Angeles Area*, 17 FCC Rcd. 1872 (rel. Jan. 25, 2002); *Algreg Cellular Engineering, Memorandum Opinion and Order*, 12 FCC Rcd. 8148 (rel. June 3, 1997).

²⁹ *Broadcast Character Qualifications* at ¶ 61.

