



# PUBLIC NOTICE

Federal Communications Commission  
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DA 18-1162

November 15, 2018

## FINAL NOTICE OF INTENT TO DECLARE THE INTERNATIONAL SECTION 214 AUTHORIZATION OF TELEDIREK GLOBAL CORP. TERMINATED

File No. ITC-214-20120801-00193

By this Public Notice, the International Bureau (Bureau) affords Teledirek Global Corp. (Teledirek) final notice and opportunity to respond to the April 19, 2018 letter submitted by the Department of Homeland Security (DHS) with the concurrence of the Department of Justice (DOJ) (collectively, “the Executive Branch Agencies”).<sup>1</sup> The Executive Branch Agencies request that the FCC terminate, declare null and void and no longer in effect Teledirek’s international Section 214 authorization granted on March 13, 2014 and the corresponding March 3, 2014 Letter of Assurance (LOA), compliance with which is an express condition of Teledirek’s international Section 214 authorization.<sup>2</sup> The Executive Branch Agencies make this request because they believe Teledirek is no longer in business.

On August 29, 2018, the Bureau’s Telecommunications and Analysis Division sent a letter to Teledirek at the last known addresses on record via certified mail asking Teledirek to respond to the Executive Branch Agencies’ allegations and possible violations of the Commission’s rules by September 28, 2018.<sup>3</sup> The *Teledirek Letter* stated that failure to respond would be deemed as an admission of the facts alleged by the Executive Branch Agencies and the Commission and will result in the issuance of an order to terminate Teledirek’s international section 214 authorization.<sup>4</sup> We did not receive a response from Teledirek.<sup>5</sup>

<sup>1</sup> Letter from Phil Ludvigson, Director, Foreign Investment Risk Management, Office of Policy, U.S. Department of Homeland Security to Marlene H. Dortch, Secretary, FCC (April 19, 2018) (*DHS Letter*).

<sup>2</sup> *Id.* at 1; FCC, International Bureau, *International Authorizations Granted*, Report No. TEL 01662, Public Notice, 29 FCC Rcd 2930 (IB 2014); Letter from Paul Mentor, CEO, Teledirek Global Corp. to David Heyman, Assistant Secretary for Policy, Office of Policy, U.S. Department of Homeland Security and John Carlin, Acting Assistant Attorney General, National Security Division, U.S. Department of Justice (March 3, 2014).

<sup>3</sup> Letter from Denise Coca, Division Chief, Telecommunications and Analysis Division, International Bureau, FCC to Mr. Paul Ruddy Mentor, Teledirek Global Corp. at 2 (Aug. 29, 2018) (*Teledirek Letter*). A copy of this letter and the *DHS Letter* may be viewed on the FCC’s website through IBFS at <https://licensing.fcc.gov/myibfs> by searching for File No. ITC-214-20120801-00193 and accessing the “other filings related to this application” from the Document Viewing area.

<sup>4</sup> *Id.* at 3.

<sup>5</sup> On August 29, 2018 the *Teledirek Letter* was sent via certified mail to: (1) Paul Ruddy Mentor, the contact listed on the international Section 214 application (5801 West Hallandale Beach Blvd., Hallandale, FL 33023 and 2024 Hollywood Blvd., Hollywood, FL 33020); and (2) Spiegel & Utera, P.A., Teledirek’s registered agent in the FCC’s Form 499 database (1840 SW 22<sup>nd</sup> St. 4<sup>th</sup> Floor, Miami, FL 33145). The letter to Mr. Mentor at 2024 Hollywood Blvd., Hollywood, FL 33020 was returned as undeliverable. We received a signed receipt for the letter mailed to the

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Additionally, Teledirek may be in violation of several other Commission statutory and rule provisions. The *Teledirek Letter* states that Teledirek failed to inform the Commission of any changes in its business status of providing international telecommunications service, as required by Section 63.21(a) of the Commission's rules.<sup>6</sup> The *Teledirek Letter* also states there is no indication that Teledirek is currently providing service pursuant to its international Section 214 authorization and if Teledirek has discontinued service, it may also be in violation of Section 63.19 of the Commission's rules requiring prior notification for such a discontinuance.<sup>7</sup> Further, as part of its authorization, Teledirek was required to file an annual international telecommunications traffic and revenue report pursuant to Section 43.62 of the Commission's rules, which was in effect until April 2018.<sup>8</sup> Specifically, Section 43.62(b) required that "[n]ot later than July 31 of each year, each person or entity that holds an authorization pursuant to section 214 to provide international telecommunications service shall report whether it provided international telecommunications services during the preceding calendar year."<sup>9</sup> Teledirek, however, did not submit traffic and revenue reports indicating whether or not it provided services for the 2014 and 2015 reporting periods.<sup>10</sup>

Teledirek's failure to respond to this Public Notice will be deemed as an admission of the facts alleged by the Executive Branch Agencies and of the violations of the statutory and rule provisions set out above. The Bureau hereby provides final notice to Teledirek that it intends to take action and issue an Order declaring Teledirek's international Section 214 authorization terminated for failure to comply with conditions of its authorization. We further advise Teledirek that its non-compliance with the applicable regulatory provisions would warrant termination wholly apart from Teledirek's inability to satisfy the conditions of its authorization. **Teledirek must respond no later than 15 days of the date of this Public Notice and address the issues alleged in the *DHS Letter*.**

The Bureau is serving a copy of the Public Notice on Teledirek by certified mail, return receipt requested at the last addresses of record appearing in Commission records. Teledirek should send its response to Denise Coca, Chief, Telecommunications and Analysis Division, International Bureau via email at [Denise.Coca@fcc.gov](mailto:Denise.Coca@fcc.gov) and Veronica Garcia-Ulloa, Attorney Advisor, Telecommunications and Analysis Division, International Bureau at [Veronica.Garcia-Ulloa@fcc.gov](mailto:Veronica.Garcia-Ulloa@fcc.gov) and file it in File No. **ITC-214-20120801-00193** via IBFS at <http://licensing.fcc.gov/myibfs/pleading.do>.

The proceeding in this Notice shall be treated as a "permit-but-disclose" proceeding in accordance with the Commission's *ex parte* rules.<sup>11</sup> Persons making *ex parte* presentations must file in IBFS, under File No. **ITC-214-20120801-00193**, a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation. Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made,

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address of Teledirek's registered agent. We also emailed the *Teledirek Letter* to Mr. Mentor's last known email address ([ruddy@teledirekllc.com](mailto:ruddy@teledirekllc.com)). We received an automatic electronic reply stating that delivery to recipient was complete, but no delivery notification was sent by the destination server.

<sup>6</sup> *Teledirek Letter* at 1 (stating that after having received an international Section 214 authorization, pursuant to Section 63.21(a), a carrier "is responsible for the continuing accuracy of the certifications made in its application" and must correct information no longer accurate, "and in any event, within thirty (30) days"); 47 CFR § 63.21(a).

<sup>7</sup> *Id.* at 2, n.5 (citing 47 CFR § 63.19).

<sup>8</sup> *Id.* at 2, n.6. (citing 47 CFR § 43.62(b) and providing subsequent history).

<sup>9</sup> 47 CFR § 43.62(b) (2015).

<sup>10</sup> *Teledirek Letter* at 2, n.8.

<sup>11</sup> 47 CFR § 1.1200 *et seq.*

and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter's written comments, memoranda, or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with rule 1.1206(b).<sup>12</sup> In proceedings governed by rule 1.49(f) or for which the Commission has made available a method of electronic filing, written *ex parte* presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (e.g., .doc, .xml, .ppt, searchable .pdf). Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules.

For further information, please contact Veronica Garcia-Ulloa, Attorney Advisor, Telecommunications and Analysis Division, International Bureau, (202) 418-0481.

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<sup>12</sup> 47 CFR § 1.1206(b).