

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

In the Matter of)	
)	
Telefonica Digital, Inc. (f/k/a Jajah, Inc.))	File No. ITC-214-20121106-00284
)	
Application for authorization under Section)	
214 of the Communications Act of 1934, as)	
amended)	
)	
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**PETITION TO ADOPT CONDITIONS TO
AUTHORIZATIONS AND LICENSES**

The Department of Justice (“DOJ”), including the Federal Bureau of Investigation (“FBI”), with the concurrence of the Department of Homeland Security (“DHS”)(collectively, the “Agencies”), submit this Petition to Adopt Conditions to Authorizations and Licenses (“Petition”), pursuant to Section 1.41 of the Federal Communications Commission (“Commission”) rules.¹ Through this Petition, the Agencies advise the Commission that they have no objection to the Commission approving the authority sought in the above-referenced proceeding, provided that the Commission conditions its approval on the agreement of Telefonica Digital, Inc. (f/k/a Jajah, Inc.) to abide by the commitments and undertakings set forth in the July 8, 2013 Letter of Assurance (“LOA”) which is attached hereto.

In the above-referenced proceeding, the Applicant petitioned the Commission for authority under Section 214 of the Communications Act of 1934, as amended, to provide

¹ 47 C.F.R. § 1.41.

international global or limited global facilities-based services, and global or limited global resale services (47 C.F.R. §§ 63.18(e)(1) and (2)) to all international points.

The Commission has long recognized that law enforcement, national security, and public safety concerns are part of its public interest analysis, and has accorded deference to the views of other U.S. government agencies with expertise in those areas. *See In the Matter of Comsat Corporation d/b/a Comsat Mobile Communications, etc.*, 16 FCC Rcd. 21,661, 21707 ¶ 94 (2001).

After discussions with representatives of the Applicant in connection with the above-referenced proceeding, the Agencies have concluded that the commitments set forth in the LOA will help ensure that the Agencies and other entities with responsibility for enforcing the law, protecting the national security, and preserving public safety can proceed appropriately to satisfy those responsibilities. Accordingly, the Agencies advise the Commission that they have no objection on those grounds to the Commission granting the application in the above-referenced proceeding, provided that the Commission conditions its consent on compliance by Telefonica Digital, Inc. with the commitments set forth in the LOA.

Respectfully submitted,

/s/ Richard C. Sofield
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July 12, 2013