

February 11, 2014
Voice Trader LLC
19806,19c Trolley SQ,
Wilmington USA

Mr. John Carlin

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

Re: Pending application by Voice Trader LLC for authorization under Section 214 of the Communications Act of 1934, as amended (FCC File Number: ITC-214-20121120-00307).

Dear Mr. Carlin:

This Letter of Assurances (LOA) outlines the commitments being made by Voice Trader LLC (“Voice Trader”) to the U.S. Department of Justice (“DOJ”) in order to address national security, law enforcement, and public safety concerns raised with regard to the pending applications to the Federal Communications Commission (“FCC”) requesting authority to provide global or limited-global facilities-based and resale services (47 C.F.R. §§ 63.18(e)(1) and (2)) to all international points under Section 214 of the Communications Act of 1934, as amended.

Voice Trader agrees that it will comply with all applicable lawful interception statutes, regulations, and requirements, and will comply fully with all court orders and other legal process for lawfully authorized electronic surveillance including, but not limited to Pen Register and/or Trap and Trace Orders issued pursuant to 18 U.S.C. sections 3121-3127.

Voice Trader agrees that, for all customer billing records, subscriber information, or any other related information used, processed, or maintained in the ordinary course of business relating to the service offered relating to communications services offered to U.S. persons (“U.S. Records”), Voice Trader will make such U.S. Records available in the U.S. in response to lawful U.S. process. For these purposes, U.S. Records shall include information subject to disclosure to a U.S. Federal or state governmental entity under the procedures specified in Sections 2703(c) and (d) and Section 2709 of Title 18 of the United States Code.

Voice Trader also agrees that it will continue to maintain one or more points of contact within the United States with the authority and responsibility for accepting and overseeing compliance with a wiretap order, pen/trap order, subpoena or other lawful demand by U.S. law enforcement authorities for the content of communications or the Records. If Voice Trader cannot provide direct access to the facilities necessary to comply with such lawful demands, Voice Trader will identify an individual who is authorized to provide law enforcement officials with whatever access is necessary to effectuate these lawful demands. Voice Trader will

promptly notify the DOJ of any change in the point(s) of contact. The point(s) of contact shall be a resident U.S. citizen or U.S. citizens, and Voice Trader shall cooperate with any request by a U.S. government authority that a background check or security clearance process be completed for a designated point of contact.

Voice Trader agrees that in the event the commitments set forth in this letter are breached, in addition to any other remedy available at law or equity, DOJ may request that the FCC modify, condition, revoke, cancel, or render null and void any relevant licenses, permits, or other authorizations granted by the FCC to Voice Trader or any successors-in-interest. Nothing herein shall be construed to be a waiver by Voice Trader of, or limitation on, its rights to oppose or comment on any such request.

Nothing in this letter is intended to excuse Voice Trader from its obligations to comply with any and all applicable legal requirements and obligations, including any and all applicable statutes, regulations, requirements, or orders.

Voice Trader understands that, upon execution of this letter by an authorized representative or attorney for Voice Trader, DOJ shall notify the FCC that it has no objection to the FCC's grant of Voice Trader's application, to the extent consistent with this LOA.

Sincerely,



Armenak Khachatryan, CEO,

Voice Trader LLC