

**ADVANCED VOICE TECHNOLOGIES**  
**35-15 84th Street, Suite 2H**  
**Jackson Heights NY 11372**

July 8, 2013

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 Advanced Voice Technologies LLC (AVT) for authorization under Section 214 of the Communications Act of 1934, as amended (FCC ITC-214-20121222-00325).

Dear Mr. Carlin:

This letter outlines the commitments being made by AVT to the US Department of Justice (DOJ) in order to address national security, law enforcement, and public safety concerns raised with regard to the AVT application to the Federal Communications Commission (FCC) requesting authority to provide 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 under Section 214 of the Communications Act of 1934, as amended.

AVT is a New York corporation, owned by the four (4) following Armenian nationals: Karen Bdoyan (20%), Samvel Sahakyan (25%), Artak Harutyunyan (25%), and Garegin Gyulasaryan (20%). The remaining 10% is held for future investors.

AVT agrees that it is covered by and will comply with all applicable lawful interception statutes, regulations, and requirements, including the Communications Assistance for Law Enforcement Act (CALEA) and its implementing regulations, and will comply with all court orders and other legal process for lawfully authorized electronic surveillance. AVT will provide DOJ with a report on the status of its implementation of lawful interception capabilities, including the status of its compliance with CALEA, within sixty (60) days after the grant of its authority, and every thirty (30) days thereafter up until the time when AVT has fully implemented lawful interception capabilities. AVT understands that its failure to fulfill its obligations under this paragraph could constitute a breach of its commitments to DOJ.

AVT agrees that it will inform DOJ at least 30 days in advance if it provides interconnected VoIP services to residential users, businesses, and enterprises in the U.S. Moreover, if AVT begins to provide interconnected VoIP/VoP in the U.S., the company agrees to maintain a point of contact ("POC") in the U.S., preferably a U.S. citizen, to receive service of process for U.S.

records and to assist and support lawful requests for surveillance by U.S. federal, state, and local law enforcement agencies. The name of and contact information for this POC will be provided to DOJ at least 30 days prior to the date that AVT begins to provide these services to residential end users, businesses, and enterprise customers and will be subject to DOJ approval. AVT also agrees to provide DOJ at least 30 days prior notice of any change to this POC.

AVT agrees that it will not, directly or indirectly, disclose or permit disclosure of or access to U.S. records or domestic communications or any information (including call content and data) pertaining to a wiretap order, pen/trap order, subpoena or other lawful demand by a U.S. law enforcement agency for U.S. 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-U.S. government without first satisfying all pertinent requirements of U.S. law and obtaining the express written consent of DOJ, or the authorization of a court of competent jurisdiction in the U.S. The term “non-U.S. government” means any government, including an identified representative, agent, component or subdivision thereof, that is not a local, state or federal government in the U.S. Any such requests for legal process submitted by a non-US government to AVT shall be referred to 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 AVT, unless disclosure of the request or legal process would be in violation of U.S. law or an order of a court of the U.S.

AVT also agrees to ensure that U.S. records are not made subject to mandatory destruction under any foreign laws. The location of the U.S. records storage facility will be provided to DOJ at least 30 days in advance of the time in which AVT anticipates generating U.S. records.

AVT 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 license, permit, or other authorization granted by the FCC to AVT or any successors-in-interest. Nothing herein shall be construed to be a waiver by AVT of, or limitation on, its right to oppose or comment on any such request.

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

AVT understands that, upon execution of this letter by an authorized representative or attorney for AVT, DOJ shall notify the FCC that it has no objection to the FCC’s grant of AVT’s applications.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Karen Bdoyan', written over a horizontal line.

Name: Karen Bdoyan  
Title: President