

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

<b>In the Matter of</b>	)	
	)	
<b>IP Network America, LLC</b>	)	
	)	
<b>Application pursuant to Section 214 of the Communications Act of 1934, as amended to provide global facilities-based and resale services</b>	)	<b>File No. ITC-214_____</b>
	)	

**APPLICATION**

IP Network America, LLC (“IP Network America” or “Applicant”), hereby requests authority, pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214 (1982), and Section 63.18 of the Federal Communications Commission's (“Commission”) Rules, 47 C.F.R. § 63.18, to provide global international resale authority between the United States and international points, except those international points not authorized by the Commission (the “Application”). IP Network America is a U.S. company organized to provide international telecommunications services. IP Network America is affiliated, through common ownership, with IP Network S.A. de C.V. IP Network America serves business customers throughout the United States and the world. By granting this application, the Commission will serve the public interest, convenience and necessity by promoting competition in the international services market. Competition will benefit U.S. consumers by increasing service options and lowering prices. Thus, the public interest will be served by the grant of Section 214 authority to IP Network America.

**SECTION 63.18 INFORMATION**

The following information is submitted, as required by Section 63.18 of the Commission’s Rules, in support of Applicant request for authorization:

(a) The name, address and telephone number of the Applicant is:

IP Network America, LLC  
355 NW 36TH ST # 507  
Virginia Gardens, FL 33166  
(800) 246-2677

(b) IP Network America is a company organized under the laws of Delaware.

(c) Correspondence concerning this application should be sent to:

Rosario Gonzalez  
IP Network America, LLC  
355 NW 36TH ST # 507  
Virginia Gardens, FL 33166  
(240) 997-5793

with a copy to

Raul Magallanes, Esq.  
The Law Office of Raul Magallanes, PLLC  
P.O. Box 1213,  
Houston, TX 77549

(d) IP Network America does currently holds one 214 authorization: ITC-214-20120427-00112

(e) IP Network America requests global facilities-based and resale Section 214 authority pursuant to the terms and conditions of Section 63.18(e)(1) and (2) of the Commission's Rules, 47 C.F.R. §63.18(e)(1) (2).

(f) At this time, IP Network America seeks no other authorization available under Section 63.18(e).

(g) Not applicable.

(h) In support of this certification, the name, address, citizenship and principal business of the person(s) that control ten percent or more of IP Network America is as follows:

IP Network, S.A. de C.V.  
Batallon de San Patricio 109-1103  
Col. Valle Oriente  
San Pedro Garcia N.L. CP 64220  
Ownership: 99%

Incorporation: Mexico

Ownership of IP Network America, LLC

Rosario Gonzalez

Batallon de San Patricio 109-1103

Col. Valle Oriente

San Pedro Garcia N.L. CP 64220

Ownership: 100%

Citizenship: Mexico

Business: Telecommunications

- (i) IP Network America is affiliated with IP Network S.A. de C.V., a resell carrier in Mexico that owns no facilities in Mexico.
- (j) IP Network America certifies that it does not seek to provide international telecommunications services to any destination country for which any of the following is true:
  - 1. IP Network America is a foreign carrier in that country; or
  - 2. IP Network America controls a foreign carrier in that country; or
  - 3. Any entity that owns more than 25 percent of IP Network America or that controls IP Network America controls a foreign carrier in that country.
- (k) IP Network America certifies that (1) Mexico is a member of the World Trade Organization; (2) the applicant's affiliated foreign carrier lacks market power in Mexico; (3) Mexico provides effective competitive opportunities to U.S. carriers.
- (l) IP Network America will sell the international switchless services of an unaffiliated U.S. carrier. It complies with 63.10(a)(3) as IP Network, S.A. de C.V. lacks 50 percent market share in the market it serves. It is a very small reseller of international interexchange service, but intends to transition its business to the U.S. company.
- (m) IP Network America certifies that it meets the requirements of § 63.10(a)(3) to be classified as a non-dominant carrier. IP Network, S.A. DE C.V. provided approximately 140 million international long distance minutes in 2011. Compared to more than 12 billion total estimated international minutes sold in Mexico, it is a de minimus amount (about 1%). This business generated the equivalent of \$280,000 in 2011. The low

volume of business done by IP Network, S.A. DE C.V. qualifies the U.S. affiliate for non-dominant status.

- (n) IP Network America certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route and will not enter into such agreements in the future.
- (o) IP Network America certifies that pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules, no party to this Application has been denied federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
- (p) IP Network America requests streamline processing pursuant to Section 63.12 of the Commission's Rules. IP Network America certifies that:
  - 1. It has no affiliation with a dominant U.S. carrier whose international switched or private line services IP Network America seeks authority to resell either directly or indirectly through the resale of another reseller's services;
  - 2. It does not seek authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines; and
  - 3. The Commission has not informed IP Network America in writing that this Application is not eligible for streamline processing.

### **CONCLUSION**

In conclusion, IP Network America certifies that all of the information in this Application is accurate and correct. For these reasons, IP Network America respectfully requests that the Commission grant this Application.

Respectfully submitted,

IP Network America

By: /s/ Rosario Rodriguez  
Rosario Rodriguez, President

Date: 2/3/2013