

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

In the Matter of)	
)	
BlackWire Consulting Group, LP)	
)	
Application Under Section 214)	File No. TC _____
Of the Communication Act of 1934,)	
As Amended, for Global Authority)	
)	
For Provision of Resold and)	
Facilities-Based International)	
Switched)	
)	
Between the U.S. and Various)	
International Points)	

APPLICATION

BlackWire Consulting, LP (“BlackWire” or “Applicant”), by its attorneys and pursuant to Section 214 of the Communications Act of 1934, as amended (“the Act”). 47 U.S.C. 214, hereby requests global authority to (1) operate as a facilities-based carrier pursuant to the terms and conditions of section 63.18(e) (1) of the Commission’s Rules, 47 C.F.R. § 63.18(e) (1), to all foreign points as authorized by the Commission and (2) operates as a resale carrier pursuant to the terms and conditions of Section 63.18(e) (2) of the Commission’s Rules to all foreign points as authorized by the Commission. 47 C.F.R. § 63.18(e) (2). BlackWire has no affiliation with any foreign carrier in any of the destination countries for which authority is requested nor is BlackWire affiliated with any dominant U.S. carrier whose services BlackWire may resell. Thus, pursuant to Section 63.10(a) (1) of the Commission’s Rules, 47 C.F.R. § 63.10(a) (1), BlackWire should be classified as a non-dominant carrier in its provision of international service on all routes. Furthermore, as explained herein, this Application is entitled to streamlined processing under Section 63.12 of the Commission’s Rules, 47 C.F.R. § 63.12. According to the FCC’s fee schedule, Fee Code CUT a credit card payment of \$1,050.00 was paid with Form 159 attached to this Application when it was submitted to the FCC last year (ITC-214-20130711-00187).

In support of its request for authority, BlackWire submits the following information pursuant to Section 63.18 of the Commission’s Rules, 47 C.F.R. § 63.18:

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

BlackWire Consulting Group, LP
444 Brickell Avenue, Suite 51-338
Miami, FL 33131
Tel: (305) 744-5075

- (b) BlackWire is a corporation organized under the laws of the state of Florida.
- (c) Correspondence concerning this Application should be addressed to:
- Neil S. Ende, Esq. & Craig D. Dingwall, Esq.
Technology Law Group, LLC
5335 Wisconsin Ave., N.W., Suite 440
Washington, D.C. 20015
Tel: (202) 895-1707
- (d) BlackWire has not previously received Section 214 authority from the Commission.
- (e) BlackWire is applying for authority to operate as a facilities-based carrier pursuant to the terms and conditions of Section 63.18(e)(1) of the Commission's Rules 47 C.F.R. 63.18(e)(1) and as a resale carrier pursuant to the terms and conditions of Section 63.18(e)(2) of the Commission's Rules. 47 C.F.R. 63(e) (2). BlackWire requests authority to serve all countries permitted under a grant of global authority. As evidenced by the certification provided in Attachment A, BlackWire will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.F.R. §§ 63.21-23.
- (f) At this time, Applicant does not seek authority to provide services not referenced under paragraph (e) of Sec. 63.18 of the Commission's Rules. 47 C.F.R. § 63.18(e).
- (g) BlackWire will use previously authorized facilities to provide the services requested by the Application. Consequently, BlackWire is categorically excluded from environmental assessment pursuant to Section 1.1306 of the Commission's Rules. 47 C.F.R. § 1.1306.
- (h) Salvatore Orefice and Michael J. Bongart BlackWire each own fifty percent (50%) of BlackWire. Messrs. Orefice and Bongart are both U.S. citizens, their business address is 444 Brickell Avenue, Suite 51-338, Miami, FL 33131 and they can be reached at (305) 744-5075.
- (i) As evidenced by the certification attached hereto as Attachment A, BlackWire is not affiliated with a foreign carrier.
- (j) As evidenced by the certification attached hereto as Attachment A, BlackWire does not seek to provide international telecommunications service to any destination where: (1) BlackWire is a foreign carrier in that country; (2) BlackWire controls a foreign carrier in that country; (3) any entity that owns more than a 25% interest in BlackWire, or controls BlackWire, controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% of BlackWire and are parties to, or the beneficiaries of, a contractual relationship that affects the provision of marketing of international basic telecommunications services in the United States.

- (k) Not applicable: BlackWire is not affiliated or otherwise related to any foreign carrier on any of the routes which BlackWire proposed to provide service in this Application.
- (l) Not applicable: BlackWire is not a foreign carrier and is not affiliated with a foreign carrier on any of the routes it proposes to resell international telecommunications service.
- (m) Not applicable: BlackWire is not affiliated with any foreign carrier on any of the routes it proposes to provide services.
- (n) As evidenced by the certification provided in Attachment A, BlackWire has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future.
- (o) As evidenced by the certification provided in Attachment A, no party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
- (p) BlackWire respectfully requests streamlined processing of this Application pursuant to Section 63.12 of the Commission's Rules, 47 C.F.R. § 63.12. This Application qualifies for streamlined processing for the following reasons: (1) BlackWire is not affiliated with a foreign carrier on any route for which authority is sought; (2) BlackWire is not affiliated with any dominant U.S. carrier whose international switched or private line services it seeks to resell; and (3) BlackWire is not requesting authority to provide switched service over private lines to countries not previously authorized for service by the Commission.

Wherefore, BlackWire respectfully requests that the Commission grant it authority to provide international telecommunications services on a facilities and resale basis pursuant to Section 214 of the Communications Act of 1934, as amended.

Respectfully submitted,
BlackWire Consulting Group, LP

By: Michael A. Bongart
Michael Bongart, Chief Operating Officer
BlackWire Consulting Group, LP
444 Brickell Avenue, Suite 51-338
Miami, FL33131
Tel: (305) 744-5075

Date: 10/22/14

ATTACHMENT A

In the Matter of)	
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BlackWire Consulting Group, LP)	
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Application Under Section 214)	File No. TC _____
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As Amended, for Global Authority)	
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For Provision of Resold and)	
Facilities-Based International)	
Switched)	
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Between the U.S. and Various)	
International Points)	

CERTIFICATE

The undersigned hereby certifies, on behalf of BlackWire Consulting Group, LP (“BlackWire”) with respect to the foregoing application for authority to provide international services that:

1. BlackWire is not affiliated with any foreign carrier in any of the countries to which BlackWire proposes to provide service in the foregoing application.
2. BlackWire will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission’s Rules, 47 CFR 63.21-.23.
3. BlackWire does not seek to provide international telecommunications service to any destination where: (1) BlackWire is a foreign carrier in that country; (2) BlackWire controls a foreign carrier in that country; (3) any entity that owns more than a 25% interest in BlackWire, or controls BlackWire, controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% of BlackWire and are parties to, or the beneficiaries of, a contractual relationship that affects that provision or marketing of international basic telecommunications services in the United States.
4. BlackWire 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 sufficient market power on the foreign end of the route to affect

competition adversely in the U.S. market and will not enter into such agreements in the future.

5. No party to this application is subject to a denial for Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 853(a)

By: Michael A. Bongart
Michael Bongart, Chief Operating Officer
BlackWire Consulting Group, LP

Date: 10/22/14

ATTACHMENT 2

In the Matter of)
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BlackWire Consulting Group, LP)
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As Amended, for Global Authority)
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For Provision of Resold and)
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Response to Paragraphs (d), (e)(3) and (g) of Section 63.18

BlackWire Consulting Group, LP (“BlackWire” or “Applicant”) is applying for global facilities-based and resale authority under Section 63.18(e)(1) of the Commission’s Rules, 47 C.F.R. 63.18(e)(1), and Section 63.18(e)(2) of the Commission’s Rules, 47 C.F.R. 63.18(e)(2).

Response to Section 63.18(d): Applicant has not previously received authority under Section 214 of the Act. Therefore, this Section is not applicable.

Response to Section 63.18(e)(3): Applicant is not applying to acquire facilities and Applicant is applying to provide services covered by paragraphs (e)(1) and (e)(2). Therefore, this Section is not applicable.

Response to Section 63.18(g): Applicant is not seeking facilities-based authority under paragraph (e)(3). Therefore, this Section is not applicable.

By: Michael A. Bongart
Michael Bongart, Chief Operating Office
BlackWire Consulting Group, LP

Date: 10/22/14