

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

In the Matter of)	
)	
)	
Netuno Telecom International Corporation)	ITC-214-20131025-00297
)	
)	
Application for authorization under Section)	
214 of the Communications Act of 1934, as)	
amended)	
)	

**PETITION TO ADOPT CONDITIONS TO
AUTHORIZATIONS AND LICENSES**

The Department of Justice (“DOJ”) submits 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, DOJ advises the Commission that DOJ, the Department of Defense (“DOD”), and the Department of Homeland Security (“DHS”) (collectively the “USG Agencies”) have no objection to the Commission approving the authority sought in the above-referenced proceeding, provided that the Commission conditions its approval on the assurance of Netuno Telecom International Corporation (“Netuno”) to abide by the commitments and undertakings set forth in the December 16, 2014 Letter of Assurances (“LOA”) executed by DOJ and Netuno, which is attached hereto and incorporated into this Petition by this reference. The above-referenced proceeding involves an application filed by Netuno for authority to provide facilities-based and resale services to all international points except those excluded by the FCC.

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

¹ 47 C.F.R. § 1.41.

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 and communications with representatives of Netuno in connection with the above-referenced proceeding, DOJ has concluded that the additional commitments set forth in the LOA will help ensure that the Executive Branch agencies with responsibility for enforcing the law, protecting the national security, and preserving public safety, can proceed appropriately to satisfy those responsibilities. Accordingly, the USG Agencies advise the Commission that they have no objection to the Commission granting the application in the above-referenced proceeding, provided that the Commission conditions its consent on compliance by Netuno with the LOA.

Respectfully submitted,

/S/ Richard C. Sofield
Richard C. Sofield
U.S. Department of Justice
Director - Foreign Investment Review Staff
National Security Division
Bicentennial Building
600 E Street, NW, Rm 10000
Washington, D.C. 20004

January 5, 2015