



U.S. Department of Justice

National Security Division

Foreign Investment Review Staff

Washington, D.C. 20004

March 15, 2018

By E-File

Ms. Marlene H. Dortch
Federal Communications Commission
445 12th St. SW, Room TW-B204
Washington, DC 20554

Re: Routetrader, Incorporated, Holder of International Authorization ITC-214-20140319-00096 (DA 15-348, March 11, 2015).

Dear Ms. Dortch:

The Department of Justice (“DOJ”), including the Federal Bureau of Investigation (“FBI”), notifies the Federal Communications Commission (“FCC”) of the inability of the authorized holders of the above-identified authorization, Routetrader Incorporated (“Routetrader”), to comply with the FCC’s terms in granting such authorizations. Given such inability, DOJ and the FBI, with the concurrence of the U.S. Department of Homeland Security and the U.S. Department of Defense, request that the FCC terminate, declare null and void and no longer in effect, and/or revoke Routetrader’s international authorization in the above-referenced matter.

Prior to Routetrader receiving control of the authorization in FCC file number ITC-214-20140319-00096, DOJ and the FBI expressly conditioned their non-objection to Routetrader receiving the authorization on “the Commission condition[ing] its approval on the assurance on the February 15, 2015 Letter of Assurance (“LOA”). (See, Attachment A at 1, (Petition to Adopt) (March 11, 2015.)) On March 11, 2015, the FCC granted Routetrader’s application on the express condition that Routetrader comply with that LOA. (See Grant of Authority dated March 11, 2015, Public Notice No. DA 15-348, available at: http://licensing.fcc.gov/ibfsweb/ib.page.FetchPN?report_key=1080546.) This Grant of Authority stated:

A failure to comply and/or remain in compliance with any of the commitments and undertakings shall constitute a failure to meet a condition of the authorization and thus grounds for declaring the authorization terminated without further action on the part of the Commission.

(*Id.*)

On August 23, 2017, following unsuccessful attempts to reach Mr. Andrew Jacobs,

former Chief Executive Officer for Routetrader, DOJ sent an electronic correspondence to Routetrader's former counsel, Ms. Jane Wagner, to determine if Routetrader had begun operations and become compliant with the Communications Assistance for Law Enforcement Act (CALEA), 47 U.S.C. § 1001 et seq. (See Attachment B, Email correspondence with Routetrader.) On August 25, 2017, Ms. Wager emailed three individuals at Routetrader: (1) Mr. Neil Kitcher (neil.kitcher@routetrader.com), (2) Mr. Harry Bellew (harry.bellew@routetrader.com), and (3) Mr. Mathieu Smeed (matthew.smeed@routetrader.com). (See *id.*) According to Ms. Wagner's later email of August 25, 2018, her emails returned as undeliverable, whereupon she attempted to reach Routetrader through its sales and accounts email addresses (sales@routetrader.com and accounts@routetrader.com). (See *id.*) On the same day, Mr. Philip Owen, the Chief Financial Officer of Routetrader Limited, the sole shareholder of Routetrader, emailed Ms. Wagner to state: "Routetrader Inc ceased trading in March of this year [2017], it has closed its registered office and has net liabilities. Andrew Jacobs has left the business and is not a director or officer of either Routetrader or Routetrader Inc." (*Id.*) On September 15, 2017, Mr. Philip Owen emailed DOJ and stated the following:

The letter was brought to my attention by a Ms Jane Wagner from The Comm Law Group. I responded to her on 25th August and asked her to inform yourself that Routetrader Inc had ceased trading in March of this year, she agreed to respond to you but I apologise since you have not received the communication. I am therefore able [sic] to respond directly.

I am the CFO of Routetrader Limited, a UK incorporated and resident company which was the shareholder of Routetrader Inc. I am not connected with Routetrader Inc other than as the CFO of the shareholder. Routetrader Inc ceased trading in March with net liabilities. It has no activity of any kind either in the US or elsewhere and has not filed as far as I am aware anything with the FCC. It has no officers or employees and is unable to make any further filings.

(*Id.*)

In light of these developments, DOJ and the FBI request(s) that the FCC terminate and declare null, void, and no longer in effect the International Section 214 authorization issued to Routetrader, file number ITC-214-20140319-00096.

Sincerely,

SANCHITHA JAYARAM
Chief, Foreign Investment Review Staff
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United States Department of Justice

____s/_____
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