

December 15, 2014

Elaine N. Lammert
Deputy General Counsel
Federal Bureau of Investigation
U.S. Department of Justice
935 Pennsylvania Avenue, NW
Washington, DC 20535

Re: Pending Application by One Allied Fund Corporation for Authorization
Under Section 214 of the Communications Act of 1934
FCC ITC-214-20140409-00112

Dear Ms. Lammert:

This letter outlines the commitments made by One Allied Fund Corporation (hereafter "O AFC") to the Federal Bureau of Investigation (FBI) in order to address national security, law enforcement, and public safety concerns raised with regard to O AFC's application to the Federal Communications Commission (FCC) for authority to provide resale service to all authorized international points under Section 214 of the Communications Act of 1934.

O AFC confirms that it will comply with all applicable lawful interception statutes, regulations, and requirements, including the Communications Assistance for Law Enforcement Act ("CALEA"), 47 U.S.C. 1001 et seq., and its implementing regulations, and will comply with all court orders and other legal process for lawfully authorized electronic surveillance. Upon completion of the development of its lawful interception capabilities, O AFC will request that the FBI send its CALEA Implementation Unit to conduct a CALEA compliance test.¹ Once a compliance test is scheduled, O AFC will provide notice of the scheduled date. O AFC will continue to maintain such lawful interception capabilities for the duration of the time it provides services subject to CALEA. O AFC also agrees that it will comply with all other statutes, regulations, and requirements regarding electronic surveillance.

O AFC agrees to maintain a point of contact in the US, preferably a US citizen or Lawful Permanent Resident, to receive service of process for US records and to support US law enforcement agencies' lawful requests for assistance and surveillance needs.

O AFC also agrees that for all customer billing records, subscriber information, and any other related information used, processed, or maintained in the ordinary course of business relating to

¹ A request can be made by contacting the general helpdesk for the CALEA Implementation Unit at (855) LECAL EA (532-2532).

1600 Ponce de Leon Blvd
10th Floor
Coral Gables, FL 33134
USA

(305) 985-5800

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telecommunications services offered in the U.S. (U.S. Records), OAFK will store either originals or copies in the U.S. OAFK further agrees that its designated law enforcement point of contact will have access to, and will make such records available promptly and in any event no later than five business days, in the U.S. in response to lawful U.S. process.² For these purposes, U.S. Records shall include information subject to disclosure to a U.S. Federal or state governmental entity under the procedures specified in Sections 2703(c) and (d) and Section 2709 of Title 18 of the U.S. Code. OAFK also agrees to ensure that U.S. Records are not made subject to mandatory destruction under any foreign laws.

OAFK agrees that it will not, directly or indirectly, disclose or permit disclosure of or access to U.S. Records, domestic communications, or any information (including the content of communications) pertaining to a wiretap or electronic surveillance order, pen/trap order, subpoena, or other lawful demand by a U.S. law enforcement agency for U.S. Records or lawfully authorized electronic surveillance in response to legal process or a 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 or legal process submitted by a non-U.S. government to OAFK shall be referred to DOJ as soon as possible, and in no event later than five business days after such request or legal process is received by or known to OAFK, unless the 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.

OAFK agrees that in the event the commitments set forth in this letter are breached, FBI may request, in addition to any other remedy available at law or equity, that the FCC modify, condition, revoke, cancel, or render null and void any relevant license, permit, or other authorization granted by the FCC to OAFK or any successor-in-interest. Nothing herein shall be construed to be a waiver by OAFK of, or limitation on, its right to oppose or comment on any such request.

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

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

² This statement does not supersede or replace OAFK's other duties to comply with any applicable FCC requirements and regulations regarding the storage and protection of customer records, including but not limited to requirements related to the storage and protection of Customer Proprietary Network Information.

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One Allied Fund Corporation



The Company can send all notices pursuant to this letter to:

Unit Chief, Science and Technology Policy and Law Unit
Federal Bureau of Investigation
935 Pennsylvania Ave, NW
Room 7350
Washington, DC 20535

Courtesy electronic copies of all notices and communications should also be sent to Jonathan Frenkel of the FBI (at jonathan.frenkel@ic.fbi.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Angel Heza', written over a horizontal line.

Name: ANGEL HEZA
Title: PRESIDENT

For One Allied Fund Corporation

1600 Ponce de Leon Blvd
10th Floor
Coral Gables, FL 33134
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