



March 18, 2015

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

Re: Pending application by ALCALLER, INC. ("ALCALLER") for authorization under Section 214 of the Communications Act of 1934, as amended (FCC file number ITC 214-20140828-00258).

Dear Unit Chief:

This Letter of Agreement ("LOA" or "Agreement") outlines the commitments being made by ALCALLER to the Federal Bureau of Investigation ("FBI"), in order to address national security, law enforcement, and public safety concerns raised with regard to ALCALLER's application to the Federal Communications Commission ("FCC" or "Commission") requesting authority to provide global or limited-global resale services between the U.S. and all authorized points (47 C.F.R. §§ 63.18(e)(2)) under Section 214 of the Communications Act of 1934, as amended.

ALCALLER, a Texas corporation, intends to operate as a resale-based telecommunications provider in the U.S. ALCALLER is awaiting the approval of the above-referenced license by the FCC to finalize its contract with a third party for CALEA services. ALCALLER is headquartered at 21606 Park Villa Drive, Katy, Texas 77450.

ALCALLER agrees that it is covered by and will comply with all applicable lawful interception statutes, regulations, and requirements, including the Communications Assistance for Law Enforcement Act ("CALEA"), 47 U.S.C. §§ 1001-1010, and its implementing regulations, and will comply with all court orders and other legal process for lawfully authorized electronic surveillance. ALCALLER will provide the FBI with a report on the status of its implementation of lawful interception capabilities, including the status of its compliance with CALEA, within sixty (60) days after the date of the public notice advising of the Commission's grant of the above-referenced authority, and every thirty (30) days thereafter up until the time that ALCALLER has fully implemented lawful-interception capabilities.¹ The FBI may object to ALCALLER's implementation of lawful-interception capabilities, and ALCALLER will engage with the FBI in good faith to resolve the FBI's concerns with ALCALLER's proposed CALEA solution.

ALCALLER's CALEA reports will be submitted electronically and addressed to the following:

A.G.

¹ ALCALLER understands that it may use a U.S. Trusted Third Party outsourcing partner to implement its lawful intercept capability.



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Email: jonathan.frenkel@ic.fbi.gov


ALCALLER agrees that, in the event that the commitments set forth in this Agreement are breached, in addition to any other remedy available at law or equity, the U.S. Department of Justice ("DOJ") may, on the FBI's behalf, request that the FCC modify, condition, revoke, cancel, or render null and void any relevant license, permit, or other authorization granted by the FCC to ALCALLER or any successors-in-interest. Nothing herein shall be construed to be a waiver by ALCALLER of, or limitation on, its right to oppose or comment on any such request. This Agreement and all commitments hereunder shall expire upon surrender or cancellation of ALCALLER's Section 214 authority.

ALCALLER understands that, upon fully complying with its requirements under law to become compliant with CALEA, and upon the FBI's satisfaction with the materials submitted by ALCALLER demonstrating as much, the FBI will advise ALCALLER of the Agreement's expiration and shall request that the DOJ notify the FCC of the same.

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

ALCALLER understands that, upon execution of this letter by an authorized representative or attorney for ALCALLER, or shortly thereafter, DOJ shall notify the FCC that the DOJ has no objection to the FCC's grant of ALCALLER's above-referenced application with the FCC.

Sincerely,

 3/18/2015

Ivan Giron
CEO
ALCALLER, INC.