



Federal Communications Commission
Washington, D.C. 20554

June 18, 2018

Kurt Bonello
OKROUTE, Inc.
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kurt.bonello@okroute.com

Via UPS

**Re: Potential Dismissal of OKROUTE, Inc.'s International Section 214 Application
File No. ITC-214-20160719-00191**

Dear Mr. Bonello:

Our records indicate that the international Section 214 application filed by OKROUTE, Inc. (OKROUTE), File No. ITC-214-20160719-00191, remains pending awaiting completion of review by the Department of Justice (DOJ), the Department of Defense and the Department of Homeland Security (collectively the "Executive Branch agencies"). On August 16, 2016, the Executive Branch agencies requested that the Commission defer action on the application while it reviewed it for any national security, law enforcement, foreign policy, and trade policy concerns.¹ On August 26, 2016, the Commission notified you that, pursuant to Section 63.12(c)(3) of the Commission's rules,² your application was removed from streamlined processing pending Executive Branch review.³ On May 23, 2018, the Executive Branch agencies informed us that OKROUTE has indicated through its counsel that it will no longer cooperate with the Executive Branch agencies' review efforts.⁴ Consequently, the Executive Branch agencies cannot conduct their review of the application and request dismissal of the OKROUTE application.

¹ Letter from Bermel R. Paz, National Security Division, DOJ, to Marlene H. Dortch, FCC (Aug. 16, 2016). The letter may be viewed on the FCC's website through the International Bureau Filing System by searching for ITC-214-20160719-00191 and accessing the "Other Filings related to this application" from the Document Viewing Area.

² 47 CFR § 63.12 (c)(3).

³ See email from Adrienne McNeil, International Bureau, FCC to kurt.bonello@okroute.com and info@telecomcounsel.com (notifying Applicant and counsel that the application has been removed from streamlined processing at the request of the Executive Branch agencies and that the Executive Branch agencies will contact the Applicant or its counsel directly for further information, and attaching Public Notice.); *Streamlined International Applications Accepted for Filing; Section 214 Applications* (47 C.F.R. § 63.18); Public Notice, Report No. TEL-01809S (IB rel. Aug. 26, 2016).

⁴ Letter from Sanchitha Jayaram, National Security Division, DOJ, to Marlene H. Dortch, FCC at 1 (May 23, 2018). The letter may be viewed on the FCC's website through the International Bureau Filing System by searching for ITC-214-20160719-00191 and accessing the "Other Filings related to this application" from the Document Viewing Area.

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Please inform us no later than **Tuesday, July 18, 2018**, if you want to continue to seek the grant of the international Section 214 application. If you do, in your response, please indicate when you will provide the requested information to the Executive Branch agencies.⁵ If you fail to respond to this letter, we hereby provide notice that OKROUTE's international Section 214 application **will be dismissed without prejudice under Sections 1.748(a) and 63.51(b) of the Commission's rules.**⁶

Your response should be submitted via IBFS in File No. ITC-214-20160719-00191, and you should email a copy to me at Denise.Coca@fcc.gov and to David Krech, Associate Division Chief, at David.Krech@fcc.gov. We look forward to your prompt attention to this matter.

Sincerely,

Denise A. Coca /S/ by David Krech
/S/
Denise A. Coca
Division Chief
Telecommunications and Analysis Division
International Bureau

cc: Lance J.M. Steinhart, P.C.
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⁵ *Id.* at 1 (“On October 10, 2017, DOJ sent a proposed letter agreement to counsel for [OKROUTE], Mr. Lance J.M. Steinhart, and an employee of Mr. Steinhart’s office, Ms. Kali Reeves. On December 6, 2017, Ms. Reeves notified DOJ via electronic mail that, “[OKROUTE] does not want to move forward but has not authorized us to withdraw,” adding, “Please forward us a copy of the dismissal when issued.””).

⁶ 47 CFR §§ 1.748(a), 63.51(b).