



Federal Communications Commission
Washington, D.C. 20554

August 1, 2019

Mr. Venkatesh Balasubramanian
Plivo Inc.
340 Pine St., Suite 503
San Francisco, CA 94104
venky@plivo.com

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

**RE: Potential Dismissal of Plivo Inc.’s Application for International Section 214 Authority
File No. ITC-214-20180302-00042**

Dear Mr. Balasubramanian:

On March 2, 2018, Plivo Inc. (Plivo) filed the above referenced application with the Federal Communications Commission (Commission) for an international section 214 authorization, File No. ITC-214-20180302-00042. On July 20, 2018, the Commission referred Plivo’s application to the Department of Justice (DOJ), the Department of Defense, and the Department of Homeland Security (collectively the “Executive Branch agencies”) due to the applicant’s reportable foreign ownership. On July 24, 2018, the Executive Branch agencies requested that the Commission defer action on the application while they reviewed it for any national security, law enforcement, and public safety concerns.¹

On June 10, 2019, the Executive Branch agencies informed the Commission that they are no longer reviewing the application.² According to the Executive Branch agencies, Plivo has missed four deadlines to respond to DOJ’s requests for information and on July 7, 2019, Plivo’s representative requested that Plivo’s application be dismissed without prejudice.³ On June 11, 2019, Commission staff called Plivo’s counsel to discuss the status of the application. Counsel informed Commission staff that Plivo intends to withdraw the application. As of the date of this letter, however, the Commission has received no such request from the applicant.

Please inform us no later than **Friday, August 30, 2019**, if you want to continue to seek the grant of the international Section 214 application. If you do, please indicate when you will provide the requested information to DOJ. If you fail to respond to this letter, we hereby provide notice that Plivo’s

¹ Letter from Debbie Wheeler, National Security Division, DOJ, to Marlene H. Dortch, FCC (July 24, 2018). All letters referenced here may be viewed on the FCC’s website through the International Bureau Filing System (IBFS) by searching for ITC-214-20180302-00042 and accessing the “Other Filings related to this application” from the Document Viewing Area.

² Letter from Loyann A. Egal, Deputy Chief, and Alice Suh Jou, Attorney, National Security Division, DOJ, to Marlene H. Dortch, FCC (June 10, 2019).

³ *Id.*

international section 214 application will be dismissed without prejudice under sections 1.748(a) and 63.51(b) of the Commission's rules.⁴

Your response should be submitted via IBFS in File No. ITC-214-20180302-00042, 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,

A handwritten signature in cursive script that reads "Denise Coca".

Denise Coca, Chief
Telecommunications & Analysis Division
International Bureau

cc: Natasha Freeman
Global Strategic Accountants
1595 Peachtree Pkwy STE
Cumming, GA 30041
nfreeman@gsaudits.com

⁴ 47 CFR §§ 1.748(a), 63.51(b).