

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

**In the Matter of** )  
 )  
**Pinless Communications Inc.,** )  
 )  
**Application for authority pursuant** ) **File No.: ITC-214\_\_\_\_\_**  
**to Section 214 of the** )  
**Communications Act of 1934,** )  
**as amended, for global authority** )  
**to operate as an international** )  
**facilities-based and resale carrier** )

**APPLICATION FOR AUTHORITY**

**Pinless Communications Inc.**, (hereafter also called “Applicant” or “**Pinless Communications**”) hereby requests authority, pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. Section 214 et. al. (1982), and Section 63.18 of the Federal Communication Commission's (hereafter called “Commission”) Rules, 47 C.F.R. Section 63.18, to request global or limited international resale services between the United States and international points, except any international points not authorized by the Commission and updated from time to time on the Commission’s Exclusion List. **Pinless Communications** is a U.S. company organized under the laws of the **State of Pennsylvania** to provide international telecommunications services. **Pinless Communications** has not previously applied for Authority from the Commission. Upon grant of authority **Pinless Communications** will serve customers throughout the United States. By granting this application, the Commission will serve the public interest, convenience and necessity by promoting competition in the international services market. Competition will benefit U.S. consumers by increasing service options and lowering prices. Thus, the public interest will be served by the grant of Section 214 authority to **Pinless Communications** Therefore, in support of this application, **Pinless Communications** respectfully submits the following:

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

**In the Matter of** )  
 )  
**Pinless Communications Inc.,** )  
 )  
**Application for authority pursuant** ) **File No.: ITC-214\_\_\_\_\_**  
**to Section 214 of the** )  
**Communications Act of 1934,** )  
**as amended, for global authority** )  
**to operate as an international** )  
**facilities-based and resale carrier** )  
 )

**Application Attachment I.**

**(Information pursuant to 47 CFR § 63.12)**

The following information is submitted, as required by 47 CFR § 63.12 of the Commission’s Rules, in support of **Pinless Communications, Inc.**, request for authorization:

**In Response to Question 9 of the FCC 214 Application:**

**Pinless Communications Inc.**, respectfully requests streamline processing pursuant to 47 CFR § 63.12 and certifies that:

1. It is not affiliated with a foreign carrier in a destination market it seeks authority to serve;
2. It has no affiliation with a dominant U.S. carrier whose international switched or private line services **Pinless Communications** seeks authority to resell, either directly or indirectly through the resale of another reseller’s services;
3. It does not seek authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines.
4. The Commission has not informed **Pinless Communications**, in writing, that this Application is not eligible for streamlined processing.

**In Response to Question 10 of FCC 214 Application:** Not Applicable to Pinless Communications Inc.,  
**In Response to Question 11 of FCC 214 Application:** Not Applicable to Pinless Communications Inc.,  
**In Response to Question 12 of FCC 214 Application:** Not Applicable to Pinless Communications Inc.,  
**In Response to Question 13 of FCC 214 Application:** Not Applicable to Pinless Communications Inc.,

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

**In the Matter of** )  
 )  
**Pinless Communications Inc.,** )  
 )  
**Application for authority pursuant** ) **File No.: ITC-214\_\_\_\_\_**  
**to Section 214 of the** )  
**Communications Act of 1934,** )  
**as amended, for global authority** )  
**to operate as an international** )  
**facilities-based and resale carrier** )  
 )

**Application Attachment II.**  
**(Information pursuant to 47 CFR § 63.18)**

The following information is submitted, as required by **47 CFR § 63.18** of the Commission's Rules, in support of **Pinless Communications, Inc.'s**, request for authorization:

**47 CFR § 63.18(a):** The name, address and telephone number of the Applicant is:

Name:	<b>Pinless Communications, Inc.</b>
Address:	600 Eagleview Blvd. Suite 300
State, City, Zip Code:	Exton, PA 19341
Telephone:	(484) 606-6245

**47 CFR § 63.18(b):** **Pinless Communications** is a corporation duly organized under the laws of the **State of Pennsylvania**.

**48 CFR § 63.18(c):** Correspondence concerning this application should be sent to:

Name:	<b>Mr. Leonid Baranchuck, President</b> <b>Pinless Communications, Inc.</b>
Address:	600 Eagleview Blvd. Suite 300
State, City, Zip Code:	Exton, Pennsylvania 19341
Telephone:	(484) 606-6245
With a copy to Contact:	<b>Edward A. Maldonado, Esq.</b> Regulatory Counsel for Applicant <b>MALDONADO LAW GROUP</b> <b>LAW OFFICES OF EDWARD A. MALDONADO, P.A.</b> <b>2850 Douglas Road Suite 303</b> <b>Coral Gables, Florida, 33134</b> <b>Tel: (305) 477-7580 ext 214 Fax: (305) 477-7504</b>

**In Response to Question 14 and 15 of the FCC 214 Application:**

**47 CFR § 63.18(d): Pinless Communications, Inc.** has not previously received authority under Section 214 of the Act.

**47 CFR § 63.18(e):** Not Applicable. At this time, **Pinless Communications** seeks no other authorization available under Section 63.18(e). **Pinless Communications** requests global or limited resale Section 214 authority pursuant to the terms and conditions of Section 63.18(e)(1) and (e)(2) of the Commission's Rules. Applicant is not applying for authority to acquire facilities or to provide services not covered by paragraphs (e)(1) through (e)(3) of Section 63.18. Applicant is not seeking facilities-based authority under paragraph (e)(1) of Section 63.18.

**47 CFR § 63.18(g):** Not Applicable.

**47 CFR § 63.18(h):** In support of this certification, the name, address, citizenship and principal business of the shareholders of **Pinless Communications** that control ten percent (10%) or more of are as follows:

<b>Name:</b>	<b>Mr. Leonid Baranchuck, President and sole shareholder</b>
<b>Address:</b>	<b>600 Eagleview Blvd. Suite 300</b>
<b>State, City, Zip Code:</b>	<b>Exton, Pennsylvania 19341</b>
<b>Telephone:</b>	<b>(484) 606-6245</b>
<b>Citizenship:</b>	<b>United States Citizen</b>
<b>Ownership Percentage:</b>	<b>100%</b>
<b>Principal Business:</b>	<b>Communication Services</b>

**47 CFR § 63.18(i): Pinless Communications** herein certifies that it is not affiliated with any dominant foreign facilities-based carriers or US dominant carriers.

**47 CFR § 63.18(j): Pinless Communications** certifies that it does not seek to provide international telecommunication services to any destination country for which any of the following are true:

1. **Pinless Communications** is a foreign dominant carrier in that country; or
2. **Pinless Communications** controls a foreign dominant carrier in that country; or
3. Any such entity that owns more than twenty-five percent (25%) of **Pinless Communications** or that controls **Pinless Communications** or controls a foreign dominant carrier in that country.

**47 CFR § 63.18(k):** Not Applicable to Pinless Communications Inc.,

**47 CFR § 63.18(l):** Not Applicable to Pinless Communications Inc.,

**47 CFR § 63.18(m):** Not Applicable to Pinless Communications Inc.,

**47 CFR § 63.18(n): Pinless Communications Inc.,** herein certifies that it has not agreed and will not agree in the future to accept any direct or indirect special concessions from a foreign carrier or administration with regards to traffic or revenue flows between the United States and any foreign countries the company is authorized to serve.

**47 CFR § 63.18(o): Pinless Communications Inc.,** herein certifies that no party to this application has been denied federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

### **CONCLUSION**

In conclusion of the foregoing, Applicant **Pinless Communications Inc.,** herein certifies that all of the information in this application is accurate and correct. For these reasons, respectfully requests that the Commission grant this application under applicable streamline processing.

Respectfully submitted,

By: /s/ Leonid Baranchuck /s/

Name: **Mr. Leonid Baranchuck**

Title: **President of Pinless Communications Inc.**

By and through their Attorney:



/s/ Edward A. Maldonado /s/

Edward A. Maldonado, Esq.

**MALDONADO LAW GROUP**

2850 Douglas Road Suite 303, Coral Gables FL 33134

Tel: 305-477-7580 Fax: 305-477-7504 Toll-Free: 1+ (877) 245-6326

[www.maldonado-group.com](http://www.maldonado-group.com)