

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

In the Matter of)	
)	
Pivotel America, Inc.)	File No. ITC-214-20190619-00124
)	
)	
Application for Global or Limited Global)	
Facilities Based and Resale Authority)	
Pursuant to Section 214 of the)	
Communications Act of 1934, as Amended)	
)	
)	
)	

**PETITION TO ADOPT CONDITIONS TO
AUTHORIZATIONS AND LICENSES**

The U.S. Department of Justice (“USDOJ”) submits this Petition to Adopt Conditions to Authorizations and Licenses (“Petition”), pursuant to Section 1.41 of the Federal Communications Commission (“Commission”) rules.¹ Through this Petition, USDOJ advises the Commission that it has no objection to the Commission approving the application in the above-referenced proceedings, provided that the Commission conditions its approval on the assurance of Pivotel America, Inc. (“Pivotel”), to abide by the commitments and undertakings set forth in the June 1, 2020 Letter of Agreement (“LOA”), a copy of which is attached hereto.

As part of the Commission’s public interest analysis, the Commission considers whether such an application raises national security, law enforcement, foreign policy, or trade policy

¹ 47 C.F.R. § 1.41.

concerns related to the applicant's foreign ownership. *See In the Matter of China Mobile International (USA) Inc.*, 34 FCC Rcd 3361, ¶ 2 (May 10, 2019).

After discussions with representatives of Pivotel in connection with the above-referenced proceeding, USDOJ has concluded that the additional commitments set forth in the LOA will help ensure that USDOJ can proceed appropriately in satisfying its responsibilities to enforce the law, protect national security, and preserve public safety. Accordingly, USDOJ advises that it has no objection to the Commission granting the application in the above-referenced proceedings, provided that the Commission conditions its consent on compliance with the LOA.

Respectfully submitted,

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