



Federal Communications Commission  
Washington, D.C. 20554

September 1, 2020

Richard L. Pelly  
Plintron Technologies USA LLC  
40 Lake Bellevue Drive, Suite 350  
Bellevue, WA 98005  
[group-cfo.us@plintron.com](mailto:group-cfo.us@plintron.com)

*Via Certified First-Class Mail – Return Receipt Requested and E-mail*

**Re: Response Required – Potential Dismissal of Plintron Technologies USA LLC’s Application for International Section 214 Authorization, File No. ITC-214-20200528-00084**

Dear Mr. Pelly:

On May 28, 2020, Plintron Technologies USA LLC (Plintron) filed the above referenced application with the Federal Communications Commission (Commission) to obtain an international section 214 authorization. On June 15, 2020, the Commission referred Plintron’s application to the Department of Justice (DOJ), the Department of Defense, and the Department of Homeland Security (collectively, the Executive Branch agencies) for review due to reportable foreign ownership. On June 19, 2020, the Executive Branch agencies requested that the Commission defer action on the application so that they could review it for any national security, law enforcement, and public safety issues.<sup>1</sup> On August 18, 2020, the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (Committee) recommended that the application be dismissed without prejudice because Plintron failed to provide information to the Committee by August 14, 2020.<sup>2</sup> Plintron is now required to respond to the Committee’s letter no later than October 1, 2020.

The Committee states that Plintron, through counsel, received triage questions on July 2, 2020, with a response deadline of July 24, 2020.<sup>3</sup> On July 23, 2020, Plintron’s counsel requested an extension of time until August 7, 2020, in which to respond. This request was granted on July 23, 2020; however, Plintron subsequently failed to respond by that date.<sup>4</sup> On August 12, 2020, the Committee informed Plintron’s counsel that unless responses to the initial triage questions were received by August 14, 2020, the Committee would return the application to the Commission with a recommendation that the application be dismissed without prejudice. On August 14, 2020, Plintron’s counsel requested additional time to respond, through September 14, 2020, which was denied.<sup>5</sup>

---

<sup>1</sup> Letter from Jason Trigger, Attorney Advisor, National Security Division, DOJ, to Marlene H. Dortch, Federal Communications Commission (June 19, 2020).

<sup>2</sup> Letter from Jason Trigger, Attorney Advisor, National Security Division, DOJ, to Marlene H. Dortch, Federal Communications Commission (August 18, 2020) (Aug. 18, 2020 DOJ Letter); *see also* Executive Order No. 13913, Establishing the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector, 85 Federal Register 19643 (April 8, 2020)

<sup>3</sup> Aug. 18, 2020 DOJ Letter at 2.

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

Please inform us no later than **Thursday October 1, 2020** if you want to continue to seek international section 214 authority and indicate in the filing the date you have provided the requested information to the Committee. If you fail to respond to this letter, we provide notice that Plintron's application will be dismissed without prejudice under sections 1.748(a) and 63.51(b) of the Commission's rules.<sup>6</sup>

Your response should be submitted via IBFS in File No. ITC-214-20200528-00084, and you should email a copy to me at [Denise.Coca@fcc.gov](mailto:Denise.Coca@fcc.gov) and to Adrienne McNeil at [Adrienne.McNeil@fcc.gov](mailto:Adrienne.McNeil@fcc.gov). We look forward to your prompt attention to this matter.

Sincerely,

*/Denise Coca/*

Denise Coca, Chief  
Telecommunications & Analysis Division  
International Bureau

Enclosure: Aug. 18, 2020 DOJ Letter

cc: Lance J.M. Steinhart  
Lance J.M. Steinhart, P.C.  
1725 Windward Concourse, Suite 150  
Alpharetta, GA 30005  
[info@telecomcounsel.com](mailto:info@telecomcounsel.com)

Loyaan A. Egal  
Deputy Chief  
Foreign Investment Review Section  
National Security Division  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001  
[Loyaan.Egal@usdoj.gov](mailto:Loyaan.Egal@usdoj.gov)

Jason Trigger  
Attorney Advisor  
Foreign Investment Review Section  
National Security Division  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001  
[Jason.Trigger2@usdoj.gov](mailto:Jason.Trigger2@usdoj.gov)

---

<sup>6</sup> 47 CFR §§ 1.748(a), 63.51(b).



**U.S. Department of Justice**

National Security Division

---

*Foreign Investment Review Section*

*Washington, D.C. 20530*

August 18, 2020

By E-File

Ms. Marlene H. Dortch  
Federal Communications Commission  
445 12th St. SW, Room TW-B204  
Washington, DC 20554

**Re: Plintron Technologies USA LLC, ITC-214-20200528-00084**

Dear Ms. Dortch:

The Commission is notified that the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (“Committee”) recommends that the above-referenced application (“Application”) be dismissed without prejudice.<sup>1</sup>

The Application was referred to the Committee and other Executive Branch agencies on June 15, 2020, after which the Commission deferred action on the Application on June 19, 2020. Through counsel, the applicant received triage questions on July 2, 2020, with a response deadline of July 24, 2020. On July 23, 2020, counsel for the applicant requested an extension of time until August 7, 2020, in which to respond. This request was granted on July 23, 2020; however, the applicant subsequently failed to respond by that date. On August 12, 2020, counsel for the applicant was informed that unless responses to the initial triage questions were received by August 14, 2020, the Committee would return the application with a recommendation that it be dismissed without prejudice. On August 14, 2020, counsel for the applicant requested an additional extension of time to respond, through September 14, 2020. That request was denied.

The Committee recommends that the application be dismissed without prejudice to refile when the applicant is prepared to provide timely responses to the Committee’s questions.

Thank you for your consideration.

Sincerely,

/s/

Jason Trigger  
Attorney Advisor

---

<sup>1</sup> See attached notification of the Chair.

National Security Division  
U.S. Department of Justice

cc: [FCC-TTelecom@fcc.gov](mailto:FCC-TTelecom@fcc.gov)  
David Krech (via e-mail at [david.krech@fcc.gov](mailto:david.krech@fcc.gov))  
Adrienne McNeil (via e-mail at [Adrienne.McNeil@fcc.gov](mailto:Adrienne.McNeil@fcc.gov))  
[Applications.TT@usdoj.gov](mailto:Applications.TT@usdoj.gov)  
[IP-FCC@hq.dhs.gov](mailto:IP-FCC@hq.dhs.gov)  
[osd.pentagon.dod-cio.list.team-telecom@mail.mil](mailto:osd.pentagon.dod-cio.list.team-telecom@mail.mil)



**U.S. Department of Justice**

National Security Division

---

*Foreign Investment Review Section*

*Washington, D.C. 20530*

**Plintron Technologies USA LLC, ITC-214-20200528-00084**

Pursuant to Executive Order 13913 (Apr. 4, 2020), the Chair of the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (“Committee”) is making a notification that the Committee recommends that the above-referenced application be dismissed without prejudice.

A handwritten signature in black ink, appearing to read "Sanchitha Jayaram", written over a horizontal line.

Sanchitha Jayaram

Chief

Foreign Investment Review Section

National Security Division

U.S. Department of Justice

Date: A u g u s t 1 8 , 2 0 2 0