

ATTACHMENT 1 (AMENDED)

APPLICATION FOR ASSIGNMENT OF INTERNATIONAL SECTION 214 AUTHORIZATION

Pursuant to Section 214 of the Communications Act of 1934, as amended (the "Act") 47 U.S.C. § 214, and Section 63.24 of the Commission's rules, 47 C.F.R. § 63.24, Broadpoint License Co., LLC ("Broadpoint" or the "Assignor")¹ and ITC Global USA, LLC ("ITC USA" or "Assignee") (collectively, the "Parties") seek Commission consent to the **partial assignment** of the international Section 214 authorization for global facilities-based and global resale service held by Broadpoint, as the Assignor, to ITC USA as the Assignee. The FCC initially granted this Section 214 authority to Broadpoint in File No. ITC-ASG-201000419-00168 on May 28, 2010, Public Notice Report No. TEL-01432, 25 FCC Rcd 7156 (released June 3, 2010). Commission approval of this partial assignment would serve the public interest.

DESCRIPTION OF THE TRANSACTION (ANSWER TO QUESTION 13)

On April 15, 2011, an Asset Purchase Agreement (the "Agreement") was entered into by and among Broadpoint, LLC, Broadpoint License Co., LLC (collectively, "Broadpoint"), and ITC Global, Inc. ("ITC"), a Delaware corporation. An authorized representative of each entity listed above executed the agreement on behalf of the respective parties to the Agreement.

Pursuant to the Agreement, for certain consideration, certain assets held by Broadpoint that are used to operate a satellite communications network in the Gulf of Mexico under FCC Licenses granted by the Commission will be transferred from Broadpoint to ITC. The assets being transferred to ITC include the following: satellite customers, customer premises equipment, contracts between Broadpoint and certain vendors, permits, and satellite teleport equipment.

¹ On the FCC Form 214TC, Jonathan D. Foxman inadvertently listed under the company name for the contact information of the Assignor. Mr. Foxman is an officer of the Assignor and it has been corrected in the amendment herewith.

ITC will provide services to any existing and new customers through its wholly-owned subsidiary ITC USA, which is the entity that will hold the FCC Licenses, including the Section 214 Authorization. In addition to the FCC Licenses and the other assets listed above, ITC is also acquiring certain real property owned by Broadpoint located in Harahan, Louisiana that is used in the conduct of its satellite business. Upon consummation of the FCC Licenses to ITC USA, Broadpoint will continue to operate its mobile wireless telecommunications business, of which it operates in part pursuant to the Section 214 authorization.

Therefore, the Parties seek Commission consent to only the partial assignment of certain customer relationships related to the provision of international services currently being provided by Broadpoint to its satellite customers in the Gulf of Mexico region pursuant to its international Section 214 authorization. These customers are generally off-shore customers located on ships, oil rigs, or other types of vessels. Broadpoint will retain the Section 214 authorization subject to this transaction (File No. ITC-214-1998022600151) after the closing and by this application does *not* seek to assign it.

DESCRIPTION OF THE ASSIGNEE

ITC USA is a limited liability company organized under the laws of the State of Florida. Its corporate address is as follows: One Progress Plaza, Suite 700, St. Petersburg, FL 33701, telephone (727) 898-3895. ITC USA, through ITC, provides comprehensive networking solutions for business operating anywhere in the world. ITC provides communications in some of the world's most difficult regions, including remote and otherwise unreachable mining locations; offshore platforms; floating production, storage, and offloading vessels; and service vessels. Networks managed by ITC enable the transmission of real-time data from vessels and platforms to shore-based facilities, enabling real-time sharing of information, voice

communications, and network connectivity for improved decision making and safety in the maritime environment. ITC desires to expand its service beyond two-way radio, SCADA, telephony, and local area operations, especially by assuming control of Broadpoint's network of satellite communications in the Gulf of Mexico.

ITC will use previously authorized facilities to provide the services requested by the instant Application. Consequently, ITC is categorically excluded from environmental assessment pursuant to Section 1.1306 of the Commission's Rules, 47 C.F.R. §1.1306.

PUBLIC INTEREST STATEMENT

In deciding whether to grant applications under Sections 214(a) and 310(d) of the Communications Act of 1934, as amended,¹ the Commission must determine whether doing so is in the public interest. Many transfer or assignment applications on their face show that a transaction will yield affirmative public interest benefits and will not violate the Communications Act or Commission rules, nor frustrate or undermine the policies and enforcement of the Communications Act by reducing competition or otherwise.² Such applications do not require extensive review and expenditures of considerable resources by the Commission and interested

¹ 47 U.S.C. §§ 214(a), 310(d).

² *In re Application of GTE Corp. and Bell Atlantic Corp. for Consent to Transfer Control of Domestic and Int'l Section 214 and 310 Authorizations and Application to Transfer Control of a Submarine Cable Landing License*, Memorandum Opinion and Order, 15 FCC Rcd. 14,032, 14,048, ¶ 25 (2000) ("*GTE/Bell Atlantic Merger Order*"); *In re Applications for Consent to the Transfer of Control of Licenses and Section 214 Authorizations from MediaOne Group, Inc. to AT&T Corp.*, Memorandum Opinion and Order, 15 FCC Rcd. 9816, 9822, ¶ 13 (2000) ("*MediaOne/AT&T Merger Order*"); *In re Applications for Consent to the Transfer of Control of Licenses and Section 214 Authorizations from Tele-Communications, Inc. to AT&T Corp.*, Memorandum Opinion and Order, 14 FCC Rcd. 3160, 3170 ¶ 16 (citing *In re Applications of Bourbeuse Tel. Co. and Fidelity Tel. Co.*, Memorandum Opinion and Order, 14 FCC Rcd. 803 (1998)); *SBC/Ameritech Merger Order*, 14 FCC Rcd. at 14,740-41, ¶ 54.

parties.³ This is such a transaction. It is clear that this transaction does not violate any law or rule. Likewise, as shown below, it does not impede the realization of the objectives of the Communications Act or the Commission's ability to implement the Act. To the contrary, this transaction will result in affirmative public interest benefits and will not harm competition. Accordingly, the Commission should approve this transaction expeditiously.

As previously stated, the management of ITC has experience operating wireless systems in rural areas and is well-positioned to provide customers in the Gulf of Mexico with high-quality wireless services. ITC will receive a customer base, fully built network assets, retail facilities and operations, roaming and interconnection agreements, real property, equipment and personal property, inventory, customer support and business systems, and intellectual property. While Broadpoint's existing operations will provide an excellent platform from which to serve existing and future customers in the Gulf of Mexico, ITC expects, from time to time, to assess, upgrade, and expand these systems, just as it has done with its current telecommunications services. This transaction will maintain competition within the Gulf of Mexico. ITC currently has no presence in the Gulf of Mexico.

Consequently, ITC's acquisition and control of the FCC Licenses will introduce a new competitor to replace Broadpoint and thereby maintain competition in these markets. In addition, ITC is experienced at operating telecommunications services in rural areas and is well-equipped to maintain the competitive position of the FCC Licenses, which cover the Gulf of Mexico.

³ *In re Applications for Consent to the Transfer of Control of Licenses and Section 214 Authorizations by Time Warner Inc. and Am. Online. Inc. to AOL Time Warner Inc.*, Order, 16 FCC Rcd. 6547, 6557, ¶ 26 (2001); *GTE/Bell Atlantic Merger Order*, 15 FCC Rcd. at 14,048, ¶ 25; *MediaOne/AT&T Merger Order*, 15 FCC Rcd. at 9822, ¶ 13; *SBC/Ameritech Merger Order*, 14 FCC Rcd. 14,740-41 ¶ 54; *see also In re Petition for Forbearance of the Indep. Tel. & Telecomms. Alliance*. Third Memorandum Opinion and Order, 14 FCC Rcd. 10,816, 10,830-31, ¶ 20 (1999).

Section 63.18(c) (ANSWER TO QUESTION 10)

Assignor Contact Information:

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With a copy to:
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Assignee Contact Information (Post-Transaction)

ITC Global, Inc.
Attn: Joseph A. Spytek, President
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Section 63.18(d) (ANSWER TO QUESTION 10)

The Assignor, Broadpoint, a Delaware limited liability company, currently holds the following international authorization as a facilities-based carrier under Section 214 of the Act: ITC-AS-201000419-00168. The Assignee, ITC USA, a Florida limited liability company, does not currently hold any international authorization under Section 214 of the Act.

Section 63.18(h) (ANSWER TO QUESTION 11)

ITC USA, a Florida limited liability company, is the Assignee in the transaction described herewith. Attached as Exhibit A is a chart listing the individuals and entities that hold a 10 percent or greater direct or indirect equity/voting interest in ITC USA. The chart also provides all foreign individuals and entities that hold a direct or indirect equity/voting interest in ITC USA.²

(Set forth below is each individual and entity listed on Exhibit A.

Name/Address/Citizenship/Organized	Principal Business	Percent of Interest Held
ITC Global, Inc. Organized: Delaware, USA	Communications	100% (Direct)
Joseph A. Spytek c/o ITC Global USA, LLC One Progress Plaza, Suite 700 St. Petersburg, FL 33701 Citizenship: USA	Communications	10.00% (owns 10% of ITC Global, which in turn, owns 100% of ITC)
Michael Monier c/o ITC Global USA, LLC One Progress Plaza, Suite 700 St. Petersburg, FL 33701 Citizenship: USA	Investment	21.58% (owns 100% of Fine Spotted Partners, LLC, which in turn, owns 21.58% of ITC Global, which in turn, owns 100% of ITC)
Erwin Noval c/o ITC Global USA, LLC One Progress Plaza, Suite 700 St. Petersburg, FL 33701	Investment	10.01% (owns 10.01% of ITC Global, which in turn, owns 100% of ITC)

² ITC USA is simultaneously filing a Request for Declaratory Ruling requesting Commission consent to permit ITC to hold non-controlling indirect foreign ownership interests up to 30.3%.

Citizenship: USA		
Simon Bull c/o ITC Global USA, LLC One Progress Plaza, Suite 700 St. Petersburg, FL 33701 Citizenship: United Kingdom	Investment	4.80% (owns 4.8% of ITC Global, which in turn, owns 100% of ITC)
Christopher R. Hill c/o ITC Global USA, LLC One Progress Plaza, Suite 700 St. Petersburg, FL 33701 Citizenship: Australia	Investment	8.80% (owns 8.6% of ITC Global, which in turn, owns 100% of ITC; also has a controlling interest in CRH Telnet, which in turn, owns .2% of ITC Global, which in turn, owns 100% of ITC)
Charles Morgan c/o ITC Global USA, LLC One Progress Plaza, Suite 700 St. Petersburg, FL 33701 Citizenship: Australia	Investment	16.70% (owns 100% of SeaSpin Pty, Ltd, Aphrodite Trust A/C, which in turn, owns 16.70 of ITC Global, which in turn, owns 100% of ITC)
Fine Spotted Partners, LLC c/o ITC Global USA, LLC One Progress Plaza, Suite 700 St. Petersburg, FL 33701 Organized: WY, USA	Investment	21.58% (owns 21.58% of ITC Global, which in turn, owns 100% of ITC)
CRH Telnet c/o ITC Global USA, LLC One Progress Plaza, Suite 700 St. Petersburg, FL 33701 Organized: Australia	Investment	0.20% (owns 0.20% of ITC Global, which in turn, owns 100% of ITC)
SeaSpin Pty, Ltd. Aphrodite Trust A/C c/o ITC Global USA, LLC One Progress Plaza, Suite 700 St. Petersburg, FL 33701 Organized: Australia	Investment	16.70% (owns 16.70% of ITC Global, which in turn, owns 100% of ITC)

EXCLUSION OF SERVICE

ITC USA does not request authorization to communicate with Cuba.

FOREIGN CARRIERS

ITC USA is not affiliated or otherwise related to any foreign carrier on any of the routes which ITC USA proposed to provide service in this application. ITC USA is not a foreign carrier

and is not affiliated with a foreign carrier on any of the routes it proposed to resell international telecommunications service. ITC USA is not affiliated with any foreign carrier on any of the routes it proposes to provide services.

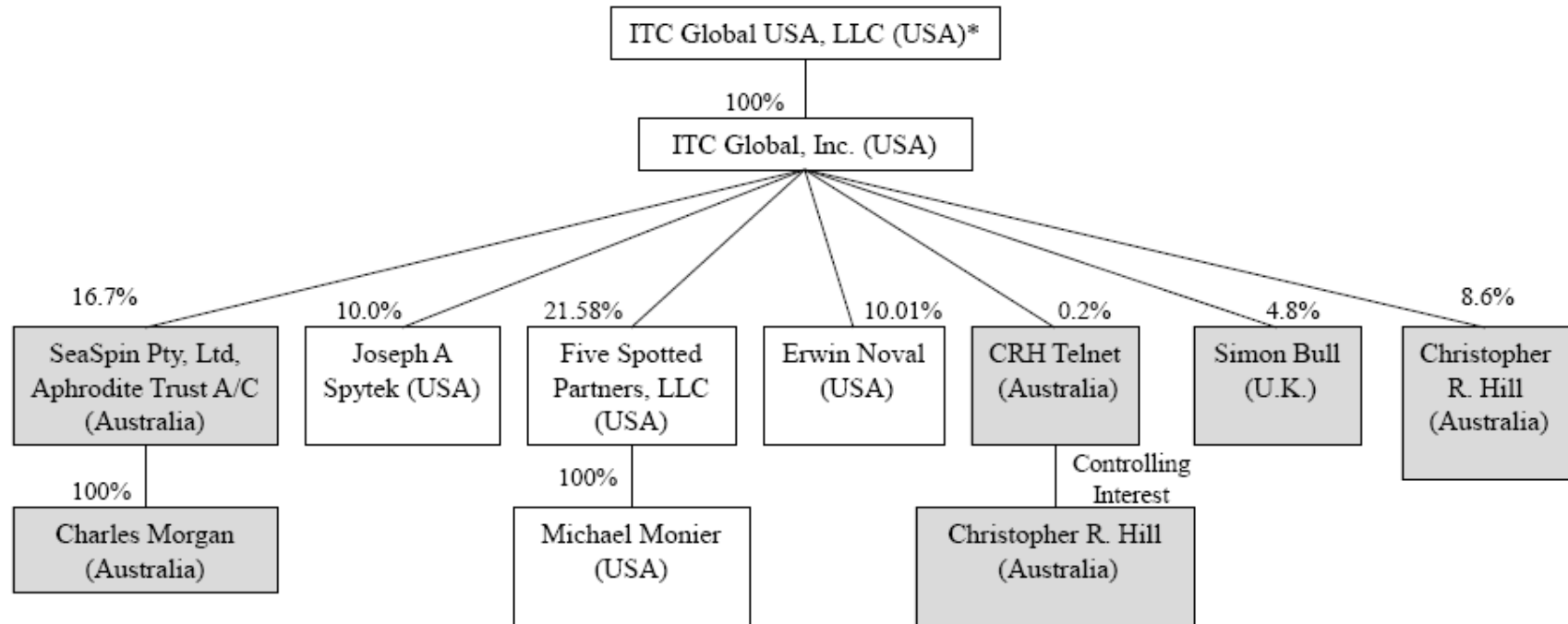
STREAMLINED PROCESSING

This application is eligible for streamlined processing pursuant to Section 63.12 of the Commission's Rules, 47 C.F.R. § 63.12. Neither ITC USA nor any entity that holds a 10 percent or greater interest in ITC USA is affiliated with a foreign carrier in a destination market. See, 47 C.F.R. § 63.12(c)(1). Following consummation of the proposed transaction, neither ITC, nor any entity that holds 10 percent or greater interest in ITC USA, will be affiliated with any dominant United States carrier whose international switched or private line service ITC USA seeks authority to resell. See, 47 C.F.R. § 63.12(c)(2).

CONCLUSION

ITC USA respectfully requests that the Commission grant it authority to provide the international telecommunications facilities-based services pursuant to Section 214 of the Communications Act of 1934, as amended. As demonstrated above, ITC USA is well-qualified to acquire, control, and make beneficial public use of the FCC Licenses. For these reasons, Commission grant of consent for the transaction described in this application is warranted.

EXHIBIT A - OWNERSHIP



*ITC Global USA, LLC., a Florida limited liability company, does not hold any interest in any other entity. Further, except for the individuals and entities listed above, no other individual or entity holds a 10 percent or greater direct or indirect interest in ITC Global USA, LLC.

= Indirect Foreign ownership (30.3% of the total equity in ITC Global, Inc, a Delaware corporation, which in turn, owns 100% of the membership units of ITC Global USA, LLC).