

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400

3050 K STREET, NW

WASHINGTON, D.C. 20007-5108

(202) 342-8400

FACSIMILE

(202) 342-8451

www.kelleydrye.com

STEVEN A. AUGUSTINO

DIRECT LINE: (202) 342-8612

EMAIL: saugustino@kelleydrye.com

NEW YORK, NY

LOS ANGELES, CA

CHICAGO, IL

STAMFORD, CT

PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICE

MUMBAI, INDIA

January 10, 2012

VIA E-MAIL — DAVID.KRECH@FCC.GOV

SUMITA.MUKHOTY@FCC.GOV

Mr. David Krech
Ms. Sumita Mukhoty
International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: [ITC-ASG-20110812-00261-Supplemental Information](#)

Dear David and Sumita:

This letter responds to our recent discussion of the pending asset transfer application for One World Telecom, LLC (“One World Telecom” or the “Company”) and NexUStel, LLC (“NexUStel”). Following is a more detailed explanation of the changes to the ownership associated with One World Telecom’s Section 214 authorization. Based upon this information, we believe that there has been one substantive change in ownership followed by two subsequent pro forma changes, not previously noticed to the Commission.

History of One World Telecom Ownership

One World Telecom, Inc. (“OWT Inc.”) received Section 214 international authority on February 13, 2004.¹ At that time, OWT Inc. was wholly-owned by Laurent Lamothe, a Haitian citizen. On January 12, 2005, One World Telecom was formed as a wholly-owned direct subsidiary to OWT Inc., but remained inoperative throughout 2005.

Effective January 1, 2006, three changes to the Section 214 authorization were effectuated simultaneously. The authorization was transferred from OWT Inc. to One World

¹ OWT Inc. was granted authority in File No. ITC-214-20040116-00018.

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Telecom. 50% of the ownership interest in OWT Inc. was transferred from Laurent Lamothe to Patrice Baker, a Haitian citizen. Finally, 50% of the direct ownership interest in One World Telecom was transferred from OWT Inc. to Business Telecommunications Services, Inc. (“BTS”), a Florida corporation. BTS is a direct wholly-owned subsidiary of BTS Group, Inc., a Delaware holding company, which is owned in equal shares by Rafael Olloqui and Ricardo Olloqui, citizens of Spain. As a result of these concurrent changes, direct ownership of One World Telecom was held in equal shares by OWT Inc. (50%) and BTS (50%). Ultimate indirect ownership of One World Telecom was held by four individuals: Laurent Lamothe (25%), Patrice Baker (25%), Rafael Olloqui (25%), and Ricardo Olloqui (25%).

Effective January 1, 2010, there was a pro forma change to the ownership of One World Telecom. OWT Inc. (the entity which had held 50% direct ownership interest in One World Telecom) was replaced with a new intermediary company, Contact Communications, LLC (“Contact”), a Florida limited liability company owned in equal 50% shares by Laurent Lamothe and Patrice Baker. Following this transaction, direct ownership of One World Telecom was held by Contact (50%) and BTS (50%). However, no substantive change in One World Telecom’s ownership occurred. Ultimate indirect ownership of One World Telecom continued to be held by the same four individuals: Laurent Lamothe (25%) and Patrice Baker (25%), Rafael Olloqui (25%), and Ricardo Olloqui (25%).

Finally, effective January 1, 2011, the ownership interest in One World Telecom held by Contact was transferred to a new intermediary entity, Telco Equipment & Support Services, Inc. (“TESS”). As with Contact, TESS is owned in equal shares by Laurent Lamothe and Patrice Baker. Consequently, this transaction also was a pro forma change only. No substantive change in the ownership of One World Telecom occurred. After this transaction, ultimate indirect ownership of One World Telecom continued to be held by the same four individuals: Laurent Lamothe (25%) and Patrice Baker (25%), Rafael Olloqui (25%), and Ricardo Olloqui (25%).

Proposed Corrective Filings

One World Telecom proposes that it file a single joint application with the FCC to seek approval of these changes. The filing will be made with both the WCB and ICB to cover both its domestic and international 214 authorizations. The single application will seek approval for each of the transactions described above, with ultimate ownership being held indirectly by the four individuals. OWT need not seek an STA for operation pending the approval.

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Please contact me with any further questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Steven A. Augustino". The signature is stylized with a large, sweeping initial "S" and a cursive "Augustino".

Steven A. Augustino
Winafred Brantl
Kelley Drye & Warren LLP
3050 K Street, NW
Suite 400
Washington, D.C. 20007-5108

Counsel for One World Telecom, LLC

SAA:pab