

Granted
Policy Division
International Bureau

ITC-STA-20060127-00073
IB2006000275

Zone Telecom, Inc.

DATE: FEB 22 2006

EXPIRE: August 21, 2006

authorized by: Chief, Policy Div. TB

Zone Telecom, Inc.
January 27, 2006

James R. B...
signature

Zone USA, Inc. (d/b/a ~~Zone Telecom, Inc.~~ Zone Telecom, Inc.) ("Zone Telecom, Inc." or "Company"), a Delaware corporation, pursuant to Section 214 of the Communications Act of 1934, as amended,

hereby requests Special Temporary Authority ("STA") to continue providing service to customers pending acceptance of the notification of *pro forma* transfer of control ("Notification") filed on January 9, 2006 (File No ITC-T/C-20060109-00012).¹ Zone Telecom, Inc. respectfully requests 180 days temporary authority while the Notification is being considered by Commission staff.

Answer to Question 10

As stated in the Notification, Zone Telecom, Inc. regrettably did not notify the Commission of the *pro forma* transfer of control within 30 days as required under Section 63.24 of the Commission's rules. Until speaking with counsel regarding an unrelated matter, Zone Telecom, Inc. did not fully appreciate the need to notify the Commission of *pro forma* changes in indirect control. However, upon learning of its obligations, Zone Telecom, Inc. took immediate action to notify the Commission and correct any deficiency at the earliest possible opportunity and has made every effort to be forthright with the Commission regarding the *pro forma* transfers of control.

In addition, Zone Telecom, Inc. has taken steps to ensure future compliance with Commission rules. As detailed above, the Company is working closely with communications counsel to ensure that this matter receives necessary attention. Counsel has briefed Zone Telecom, Inc. regarding the Company's obligations with respect to transactions which affect corporate control. In the future, the Company will consult with FCC legal counsel prior to the approval of any plans for transactions which could entail a potential transfer of control or otherwise require FCC disclosure or approval. For instance, Zone Telecom, Inc. has separately filed two applications for substantial transfers of control with the Commission (*see* file numbers ITC-T/C-20060123-00034, ITC-T/C-20060123-00035). The company will not consummate these transactions until it receives prior Commission approval.

Grant of this STA is in the public interest as it will allow Zone Telecom, Inc. to continue to provide telecommunications service to its customers. Zone Telecom, Inc. currently provides international telecommunications services pursuant to its Section 214 authority. Grant of the instant STA request would allow Zone Telecom, Inc.'s customers to receive uninterrupted service.

Zone Telecom, Inc. acknowledges that the grant of this STA will not prejudice any action the Commission may take on the underlying application seeking Commission consent to the transfer of control. Zone Telecom, Inc. further acknowledges that this STA can be revoked by the Commission upon its own motion without a hearing.

¹ This STA has been filed at the request of Commission staff.

MODE = MEMORY TRANSMISSION

START=FEB-23 10:15

END=FEB-23 10:17

FILE NO. =678

STN NO.	COMM. NO.	ONE-TOUCH/ ABBR NO.	STATION NAME/TEL NO.	PAGES	DURATION
001	OK	8	92633641	002/002	00:00:42

-INTERNATIONAL BUREAU -

***** -INTL BUREAU - ***** 202 418 2824- *****



PD

INTERNATIONAL BUREAU

Policy Division

FAX SHEET

Fax Number: (202) 418-2824

*CC: Davis
Gusson
Swinnick*

The facsimile transmission is intended only for the addressee shown below. If any content information that is privileged, confidential or otherwise protected from disclosure, any review, dissemination or use of this transmission or its contents by persons other than the addressee is strictly prohibited. If you have received this transmission in error, please notify us immediately by telephone and mail the original to us at the Federal Communications Commission, International Bureau, 445 17th Street S.W., Room 7-4623, Washington, DC 20534.

DATE: 2/23/06

FROM: George Li

TELEPHONE NUMBER: (202) 418-1462

TO: Gregory E. Kunkle

FAX NUMBER: (202) 263-3641

TELEPHONE NUMBER: 263-3640

SPECIAL INSTRUCTIONS: Ftc - 594-2006 0127 - 000095

THIS COVER SHEET IS PAGE 1 OF 2 PAGES.