

Grant Policy Division
International Bureau

NOV 22 2006

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authorized by: Chief, Policy Division, IB

James L. Bell
signature

RESPONSE TO QUESTION 10

Non-Streamlined ITC-STA-20061109-00518
IB2006003027
Reliance Communications, Inc.

Re: ITC-7/c - 2006 1109-00 517

ATTACHMENT 1
RELIANCE COMMUNICATIONS, INC.
SECTION 214 STA APPLICATION

** Applicant acknowledges the conditions of STA as stated in the 1st of Attachment 1.*

Reliance Communications, Inc. ("RCI"), pursuant to Section 214 of the Communications

Act of 1934 and Section 63.25 of the Commission's rules, 47 C.F.R. §63.25, hereby requests special temporary authority ("STA") to continue operating under its Section 214 authority pending grant of its application for a transfer of control. RCI is authorized to provide global facilities-based and resale services pursuant to authority granted in File No. ITC-214-20021107-00535.

As explained in greater detail below, RCI inadvertently failed to obtain Commission authorization prior to a series of transactions that resulted in a transfer of ultimate control over RCI. Accordingly, concurrent with the filing of this STA request, RCI is filing an application seeking Commission approval of the transfer of control. However, RCI requests special temporary authority to continue providing international telecommunications service to its customers pending the Commission's consideration of the transfer of control application. Grant of this STA request is therefore in the public interest because it will allow RCI to avoid any discontinuity of service to the public.

RCI had been controlled indirectly by Reliance Communications Ventures Limited ("RCVL") as a result of the transfer by Reliance Industries Limited ("RIL") of its various telecommunications entities to RCVL.¹ As a result of this transfer, RCVL exercised *de jure* and *de facto* control over RCI, holding an aggregate indirect ownership interest of 65.9120% in RCI. However, the corporate structure assumed by RCVL (which was renamed Reliance

¹ This transaction was described by RCI to the Commission in a transfer of control application that was timely filed on September 15, 2005 (IBFS File No. ITC-T/C-20050915-00370) and granted by the Commission on December 1, 2005. Public Notice, DA 05-3129 (Dec.

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FAX SHEET

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SPECIAL INSTRUCTIONS: SSAs Per RCI and FLAG
