

**George Li**

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**From:** Law Offices of Thomas K. Crowe [firm@tkcrowe.com]  
**Sent:** Wednesday, November 19, 2008 1:40 PM  
**To:** George Li  
**Cc:** Alexis Johns  
**Subject:** VoIP TEL, L.P. Revised International STA  
**Attachments:** fl.VoIPTEL Int'l STA request (revised).11.19.08.pdf

**LAW OFFICES OF THOMAS K. CROWE, P.C.**

**LEGAL AND CONFIDENTIAL**

George:

Please find attached a copy of the revised version of VoIP TEL, L.P.'s international STA request. The STA request has been updated with a revised Attachment 1 to replace the original Attachment 1 for VoIP TEL, L.P.'s STA request filed on November 17, 2008 (File No. ITC-STA-20081117-00505). The only change to Attachment 1 is in the first paragraph where the STA request is now for sixty (60) days rather than the initial one-hundred eighty (180) day request. All other information remains the same. The filing has been updated in IBFS, per JoAnn Sutton.

Please let me know if there is anything else you need before submitting VoIP TEL's STA requests and transfer of control applications for DOJ review. If there is, you can contact me directly at 202-263-3647.

Cheng Yi Liu, Staff Attorney "[firm@tkcrowe.com](mailto:firm@tkcrowe.com)"  
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11/19/2008

**FCC IBFS - Electronic Filing**

**Submission\_id :IB2008002718**

**Successfully filed on :Nov 17 2008 1:54:15:136PM**

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**George Li**

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**From:** Law Offices of Thomas K. Crowe [firm@tkcrowe.com]  
**Sent:** Tuesday, November 18, 2008 5:51 PM  
**To:** Alexis Johns  
**Cc:** George Li  
**Subject:** VoIP TEL, L.P. Domestic App Supplement and STA Amendment  
**Attachments:** fl.VoIP TEL LP Domestic App Supplement.11.18.08.pdf; fl.VoIP TEL domestic STA request (amendment).11.18.08.pdf

**LAW OFFICES OF THOMAS K. CROWE, P.C.**

**LEGAL AND CONFIDENTIAL**

Alex:

As requested, please find attached a supplemental filing on behalf of VoIP TEL, L.P. indicating that the transferee owners do not have any telecom affiliates. Also attached is an amended request for domestic STA. Both of these documents were electronically filed in docket WC 08-218 earlier today.

Should you have any questions, do not hesitate to contact me directly at 202-263-3647.

Cheng Yi Liu, Staff Attorney "firm@tkcrowe.com"  
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11/19/2008



# Federal Communications Commission

The FCC Acknowledges Receipt of Comments From ...  
**VOIP TEL, L.P.**  
...and Thank You for Your Comments

Your Confirmation Number is: 120081118832285

Date Received: Nov 18 2008

Docket: 08-218

Number of Files Transmitted: 1

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*updated 12/11/03*

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November 18, 2008

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: WC 08-218: VoIP TEL, L.P. : Supplement to Application for  
Consent to Transfer Control of a Domestic Carrier

Dear Sir or Madam:

VoIP TEL, L.P. ("Applicant"), pursuant to Section 214 of the Communications Act of 1934, as amended (the "Act"), hereby supplements its Domestic Application to Transfer Consent of a Domestic Carrier dated October 27, 2008 ("Application") with certain information requested by FCC staff. Applicant hereby supplements its application to add the following information:

1. Transferee, Mubarak Maknoja, does not have any telecommunications carrier affiliates as defined under the Act, 47 U.S.C. § 153(1).
2. Transferee, Muhammad Ali, does not have any telecommunications carrier affiliates as defined under the Act, 47 U.S.C. § 153(1).

Please direct any questions regarding this submission to the undersigned.

Sincerely,



Cheng-yi Liu,  
Counsel for VoIP TEL, L.P.

cc: Alexis Johns, Wireline Competition Bureau



# Federal Communications Commission

The FCC Acknowledges Receipt of Comments From ...  
**VOID TEL, L.P.**  
...and Thank You for Your Comments

Your Confirmation Number is: 20081118661305	
Date Received:	Nov 18 2008
Docket:	08-218
Number of Files Transmitted:	1
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updated 12/11/03

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November 18, 2008

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: WC 08-218; VoIP TEL, L.P.; Amendment to Request for STA

Dear Ms. Dortch:

VoIP TEL, L.P. (“Applicant”), pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, hereby respectfully requests Special Temporary Authority (“STA”), for a period of sixty (60) days, to continue providing service to customers pending the Federal Communications Commission’s (“FCC’s” or “Commission’s”) consideration and approval of an application for consent to transfer of control, which was filed on October 28, 2008 in the above referenced docket. This amends Applicant’s request for STA which was previously filed on November 17, 2008 in the above referenced docket.

As detailed in the underlying application, on December 15, 2007, the four equal owners of Applicant consummated a transaction whereby two owners sold all of their interests in Applicant to the remaining two owners through separately executed Securities Purchase Agreements. Effectively, each remaining owner now holds a total of fifty percent (50%) direct and indirect ownership interest in Applicant.<sup>1</sup> The consummation of the transaction was completely transparent and did not result in a reduction or impairment of service to any of Applicant’s customers. However, Applicant and the parties to the transaction did not seek the Commission’s consent prior to these transfers and are requesting this STA as part of a plan to correct any deficiency which may have resulted from this oversight.

Grant of this STA is in the public interest as it will allow Applicant to continue providing uninterrupted communications services to its customers. Perhaps even more importantly, as Applicant is both a wholesale service provider and a provider of prepaid calling card services, discontinuance of the Applicant’s service could result in a widespread loss of telecommunications service to end user customers of Applicant as well as customers of companies other than Applicant. Discontinuance could affect thousands of consumers. Many of

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<sup>1</sup> Since each remaining owner of Applicant increased their respective interests from twenty-five percent (25%) to fifty percent (50%), the transactions would be considered transfers of control pursuant to 47 C.F.R. § 63.24(c), despite the fact that no new ownership was introduced to the Applicant.

Marlene H. Dortch  
November 18, 2008

Page 2


the companies which rely on Applicant for wholesale service also provide service to end users on a prepaid basis. Such consumers often have lower incomes and fewer options available for the purchase of telecommunications service than options which may be available to the public at large. In addition, since such customers have already purchased service, a service disruption may result in a situation in which they cannot be made whole, even if refunds for lost service are available.

An unfortunate oversight resulted in the delay in requesting Commission consent regarding the transfers of control at issue. The owners did not have a complete understanding of the Commission's transfer of control requirements, and did not realize that even an internal transaction between existing owners, which did not introduce outside ownership interests to the Applicant, would be subject to prior Commission approval. This mistake was inadvertent, and upon discovery Applicant has taken steps to correct the deficiencies. Applicant is working closely with communications counsel to ensure that this matter receives necessary attention.

Applicant 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. Applicant further acknowledges that this STA can be revoked by the Commission upon its own motion without a hearing, and that grant of an STA and the underlying application will not preclude enforcement action.

Please contact the undersigned should you have any questions.

Sincerely,



Thomas K. Crowe  
Cheng-yi Liu,  
Counsel for VoIP TEL, L.P.


cc: Alexis Johns, Wireline Competition Bureau  
George Li, International Bureau



**George Li**

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**From:** Jodie May  
**Sent:** Tuesday, December 09, 2008 10:44 AM  
**To:** George Li; Alexis Johns  
**Cc:** David Krech; Sumita Mukhoty  
**Subject:** RE: VoIP TEL, L.P. (VoIP TEL), WC Docket No. 08-218, DA 08-2546, ITC-STA-20081117-00505, ITC-T/C-20081024-00475

 George, Julie signed the VoIP Tel domestic STA today for a period of 60 days, to expire on February 7, 2009. Thanks.

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**From:** George Li  
**Sent:** Friday, December 05, 2008 9:02 AM  
**To:** Jodie May; Alexis Johns  
**Subject:** RE: VoIP TEL, L.P. (VoIP TEL), WC Docket No. 08-218, DA 08-2546, ITC-STA-20081117-00505, ITC-T/C-20081024-00475

Thank you both.

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**From:** Jodie May  
**Sent:** Friday, December 05, 2008 9:01 AM  
**To:** George Li; Alexis Johns  
**Subject:** RE: VoIP TEL, L.P. (VoIP TEL), WC Docket No. 08-218, DA 08-2546, ITC-STA-20081117-00505, ITC-T/C-20081024-00475

Hi George,

Alex has an e-mail into Julie Yeach asking when she can sign it. We'll let you know what we hear. Thanks.

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**From:** George Li  
**Sent:** Friday, December 05, 2008 8:39 AM  
**To:** Jodie May; Alexis Johns  
**Subject:** FW: VoIP TEL, L.P. (VoIP TEL), WC Docket No. 08-218, DA 08-2546, ITC-STA-20081117-00505, ITC-T/C-20081024-00475

When you would grant the STA ??  
Happy Friday and a great weekend to you.

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**From:** Ongman, Joanne [mailto:Joanne.Ongman@usdoj.gov]  
**Sent:** Wednesday, December 03, 2008 3:50 PM  
**To:** George Li; Sofield, Richard; David Krech; fcc@bcpiweb.com; Jim Bird  
**Cc:** Alexis Johns; Jodie May  
**Subject:** RE: VoIP TEL, L.P. (VoIP TEL), WC Docket No. 08-218, DA 08-2546, ITC-STA-20081117-00505, ITC-T/C-20081024-00475

Please note that the attached letter both approves the STA request and requests deferral of the underlying application, and was just submitted via FCC e-file.

12/9/2008

Joanne

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**From:** George Li [mailto:George.Li@fcc.gov]  
**Sent:** Wednesday, December 03, 2008 11:23 AM  
**To:** Sofield, Richard  
**Cc:** Ongman, Joanne; Alexis Johns; Jodie May  
**Subject:** RE: VoIP TEL, L.P. (VoIP TEL), WC Docket No. 08-218, DA 08-2546, ITC-STA-20081117-00505, ITC-T/C-20081024-00475

Thank you Richard. Regarding the underlying application, please file your comment with WC Docket No. 08-218 by COB tomorrow(12/4) and cc me please.

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**From:** Sofield, Richard [mailto:Richard.Sofield2@usdoj.gov]  
**Sent:** Wednesday, December 03, 2008 11:16 AM  
**To:** Sofield, Richard; David Krech; Francis Gutierrez; George Li; Howard Griboff; James Ball; Janese Parker; JoAnn Sutton; Jodi Cooper; Susan OConnell; Wheaton, Mary (NSD)  
**Subject:** VoIP TEL, L.P. (VoIP TEL), WC Docket No. 08-218, DA 08-2546, ITC-STA-20081117-00505, ITC-T/C-20081024-00475

Please be advised that DOJ/FBI/DHS do not object to the STAs is the above-referenced matters.

Thanks you.

**Richard C. Sofield**

Director  
Foreign Investment Review Staff  
National Security Division  
United States Department of Justice

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12/9/2008