

**Before the
FEDERAL COMMUNICATION COMMISSION
Washington D.C. 20554**

In the Matter of:)
)
BPP Telecom, LLC)
)
And)
) File No. ITC-214-20100713-00279
)
)
)
Application for Special Temporary)
Authority to Offer International Services)
Pursuant to Section 214 of the)
Communications Act of 1934, as Amended)

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

BPP Telecom International USA, LLC. (“BPP Telecom”) by its attorneys, hereby requests Special Temporary Authority to temporarily provide international telecommunications services and to operate pursuant to 47 U.S.C. § 214, as amended (herein called the “STA Application”), while application is being contemporaneously sought by the Federal Communications Commission (the “Commission”) for permanent Authority pursuant Section 214 of the Communications Act of 1934, as amended and codified under 47 U.S.C. § 214 et. al. (The “Act”).

BACKGROUND

BPP Telecom is Florida limited liability company which desires to provide international long distance calling services to carriers and end-user consumers within the United States and Internationally. BPP Telecom is submitting this request for Special Temporary Authority contemporaneously with its International Section 214 Application to operate pursuant to 47 U.S.C. § 214 in a expedited manner. BPP Telecom is a small-sized company in the United States that is currently owned by foreign owners who shall invest the necessary money and resources into the BPP Telecom to establish and maintain services. The business plans of BPP Telecom require immediate operation to not deplete all investor funds for Operational and Capital Expenses. BPP Telecom however recognizes that referral to the Executive Branch for review is essential to any approval by the FCC for the Company to operate pursuant to 47 U.S.C. § 214. BPP Telecom further recognizes that the Executive Branch’s review process is not streamlined and may toll for a period of time of a year or longer as it has with other foreign carriers. To

not frustrate its' own business funds/resources, and to allow the FCC and Executive Branch proper time to review BPP Telecom's qualifications for Section 214 Authority, BPP Telecom believes that its present situation constitutes an extra-ordinary situation where Special Temporary Authority is proper contemporaneously with its Section 214 Application.

REQUEST FOR SPECIAL AUTHORITY

BPP Telecom hereby request Special Temporary Authority to temporarily provide international telecommunications services and to operate pursuant to 47 U.S.C. § 214 for the interim period that it may take to be properly reviewed by the Commission in an Application for a grant of permanent Authority, or alternatively a six (6) month period that may be extended by further petition, and for any operation from time tolling since its Section 214 Application due to the unique and extra-ordinary nature of BPP Telecom ' circumstances. BPP Telecom, as a switchless inter-exchange reseller of long distance and international services, recognizes that Section 214(a) of the Act prohibits any carrier from constructing, extending, or operating any line, and from engaging in transmission through any such line, "unless and until there shall first have been obtained from the Commission a certificate that the present or future public convenience and necessity" require, or will require, the construction, extension, or operation of the line.¹ BPP Telecom recognizes that it is required to obtain Section 214 Authority prior to the rendering of International Telecommunication Services to the public. BPP Telecom submits that it is undertaking affirmative efforts to be compliant with the Act and the Commission's Rules in seeking this Special Authority. BPP Telecom is prepared to meet other compliance requirements of the Commission including registration of a Form 499 Filer ID with USAC, the development of policies and reporting of CPNI compliance, and the payment of regulatory fee contributions, including TRS, LNP, NANPA, and FCC Fund contributions where applicable and required by the Commission's Rules for any services rendered under Temporary Authority.

BPP Telecom also recognizes that formal application to the Commission as 46 C.F.R § 63.18 require that "any party seeking authority pursuant to Section 214 ... for the provision of common carrier communications services between the United States, its territories or possessions, and a foreign point shall request such authority by formal application" is required and has done so a pre-requisite to this ² In making such a formal application, BPP Telecom recognizes that based upon its foreign ownership the review process shall include consultation by the Commission with the Executive Branch agencies regarding national security, law enforcement, foreign policy and trade concerns that may be unique to the

¹ 47 U.S.C. § 214(a).

² 47 C.F.R. § 63.18.

provision of international service under Team Telecom Review.³ And that, such review is not streamlined, and the Commission and Team Telecom may require time in the review of BPP Telecom's Formal Application for Section 214 Authority. This process may take several months to a year, and BPP Telecom does not wish to be in violation of the Act during this time period where it must provide services to sustain itself in its U.S. market entry. To avoid any possibility of violation of the Act, BPP Telecom hereby submits this STA Application.

CONCLUSION

For these reasons, BPP Telecom respectfully requests that the Commission grant it special temporary authority to provide international telecommunications services in the areas described in the STA Application until such time as the Commission acts upon BPP Telecom's Formal Application for permanent Authority pursuant to 47 U.S.C. § 214, as amended or alternatively a six (6) month period that may be extended by further STA Application.

Respectfully Submitted,

BPP Telecom, LLC.

By : /s/ /s/

Mr. , Director/Manager

Please Direct STA Petition Correspondence to:

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³ 1998 International Biennial Review Order, 14 FCC Rcd at 4914-15 ¶ 14; PCIA Forbearance Order, 13 FCC Rcd at 16882 ¶ 50.

**REQUEST FOR SPECIAL TEMPORARY AUTHORITY
Verification by Corporate Officer**

I, _____, Director and Manager of BPP Telecom International USA, LLC. a Florida Corporation, hereby certify the following:

1. I have read the foregoing Request for Special Temporary Authority, and, to the best of my knowledge, all of the states therein are true and correct; and
2. No party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

I declare under the penalty of perjury that the foregoing is true and correct

BPP Telecom, LLC.

By : _____/s/ _____/s/

Mr. _____, Director/Manager