

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

In the Matter of: )  
 )  
*Bangla Trac International USA, LLC* )  
 )  
And ) Docket No. \_\_\_\_\_  
 ) File No. ITC-214-20100809-00323  
 )  
 )  
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**

Bangla Trac International USA, LLC. (“Bangla Trac U.S.”) 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**

Bangla Trac U.S. is Delaware limited liability which desires to provide resold long distance telecommunication services to U.S. common carriers as well as business and residential consumers domestically within the United States and Internationally. Bangla Trac U.S. has applied for authority to permanently operate as a telecommunication Carrier under File application ITC-214-20100809-00323. Bangla Trac U.S. respectfully submits this request for Special Temporary Authority, in order to operate pursuant to 47 U.S.C. § 214 in regard to certain international carrier agreements that it will be required to perform in an expedited manner due to a commercial re-structure of a sister company in the Republic of Bangladesh. Bangla Trac U.S.

is affiliated with a sister company that is an non-dominate telecommunications provider in the Republic of Bangladesh, Bangla Trac Communications Ltd. ("Bangla Trac Ltd"). Bangla Trac Ltd. is licensed by the Bangladesh Telecommunication Regulatory Commission to provide International Gateway Services (IGW) and holds certain carrier agreements with U.S. telecommunication Carriers. Bangla Trac Ltd is currently one of the four competitive licensed operators who can route incoming and outgoing international calls to and from the Republic of Bangladesh. Bangla Trac Ltd is now structuring itself to migrate some of its telecommunication dealings with U.S. Carriers and customers to Bangla Trac U.S. in order to directly service and deliver long distance service from the United States. As a result, Bangla Trac U.S. must be in a lawful position to lawfully interconnect with U.S. Carriers and provide telecommunication services to and from the United States, if not immediately, as expeditiously as possible. Migration of these dealings from Bangla Trac Ltd. to Bangla Trac U.S. can occur at any time, but due to logistical and economic reasons of the Companies must be in place within the next thirty (30) days to not frustrate business dealings and keep a continuity of services to U.S. Carriers and customers. Bangla Trac U.S., has been taken off of Streamline processing by the Commission's International Bureau, and has begun the review process with the Executive Branch as a part of its application under ITC-214-20100809-00323. Bangla Trac U.S. understands and acknowledges that completion of the Executive Branch's review may take a series of months, and for this reason, desires to avoid any implication or occurrence of offering unauthorized services without prior authority of the Commission.

### **REQUEST FOR SPECIAL AUTHORITY**

Bangla Trac U.S. 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 the Commission, and the Executive Branch, to review its Application in File ITC-214-20100809-00323 for a grant of permanent Authority, or alternatively a six (6) month period that may be extended by further petition, due to the unique and extra-ordinary nature of Bangla Trac U.S.' circumstances. Bangla Trac U.S. as a 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.<sup>1</sup> Bangla Trac U.S. recognizes that it is required to obtain Section 214 Authority prior to the rendering of International Telecommunication Services to the public. Bangla Trac U.S. submits that undertaken affirmative efforts to be compliant with the Act and the Commission's Rules.

Bangla Trac U.S. also recognizes that 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."<sup>2</sup> Such application has been in fact made under File ITC-214-20100809-00323. Bangla Trac U.S. 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 provision of international service under Team Telecom Review.<sup>3</sup> And that, such review is not streamlined, and the Commission and Team Telecom may require reasonable time in the review of Bangla Trac U.S' Formal Application for Section 214 Authority. This process may take several months, and Bangla Trac does not wish to be in violation of the Act during this time period in providing services to established customers of international long distance services that may be migrated to it by its sister company Bangla Trac Ltd. To avoid any possibility of a violation of the Act, Bangla Trac hereby submits this STA Application. Bangla Trac U.S. further states that the Republic of Bangladesh, the country of origin of the owners of Bangla Trac U.S., is a WTO member (1995) and has established schedules through the WTO related to the basic telecommunication sector for further consideration by the Commission or the Executive Branch.

### IMPACT STATEMENT

The grant of this STA request will serve the public interest, convenience and necessity because such grant will permit Bangla Trac U.S. to provision regulated services that shall be migrated to it and to all who will rely on the company for their telecommunication needs. The grant of this STA will further ensure that Bangla Trac U.S. is compliant with the Act and can meet the needs

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<sup>1</sup> 47 U.S.C. § 214(a).

<sup>2</sup> 47 C.F.R. § 63.18.

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

of wholesale and resale customers while its underlying application for authority is considered by the Commission. Likewise, Bangla Trac U.S. is a small, new entrant provider to the U.S. telecommunications sector, and the application does not raise anti-competitive concerns. The Republic of Bangladesh, the country of origin of the owners of Bangla Trac U.S., is a WTO member (1995) and has established schedules through the WTO related to the basic telecommunication sector for further review or consideration by the Commission or the Executive Branch.

Bangla Trac U.S. acknowledges that the grant of this STA request will not prejudice any action the Commission may take on the underlying application that seeks Commission approval for authority to operate pursuant to 47 U.S.C. § 214. Bangla Trac U.S. further acknowledges that grant of this STA may be revoked by the Commission upon its own motion without hearing.

### CONCLUSION

For these reasons, Bangla Trac U.S. 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 Bangla Trac U.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,

Bangla Trac International USA, LLC

By : 

**Mr. Tarique E. Haque**, President/Managing Member of Bangla Trac International USA, LLC

Please Direct STA Petition Contact Correspondence to:

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Its Attorneys

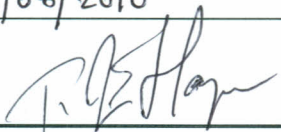
**REQUEST FOR SPECIAL TEMPORARY AUTHORITY**  
**Verification by Corporate Officer**

I, **Tarique E. Haque**, President and Managing Member of Bangla Trac International USA, LLC., a Delaware 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

Date: 24/08/2010

By : 

**Mr. Tarique E. Haque**, President/Managing Member of Bangla Trac International USA, LLC