

**PUBLIC INTEREST NETWORK SERVICES, INC.**

**Response to Question 10**

Public Interest Network Services, Inc. (“PINS”) respectfully seeks Special Temporary Authorization (“STA”) for the provision of resold international services pending grant of its application for permanent Section 63.18(e)(2) authorization, filed simultaneously herewith. PINS has only recently come to understand that, unlike the “blanket” authority to provide domestic interstate services that arises under Section 63.01(a) of the Commission’s Rules, specific application for and grant of international authorization is required. Prompt grant of the STA request would serve the public interest by allowing PINS to continue uninterrupted international service to its customers, primarily small and medium businesses, many of whom are non-profit public interest organizations.

PINS only recently became aware that it was operating without international authorization. In the course of a due diligence review in contemplation of a proposed transfer of PINS corporate control, no Section 214 International Authorization could be located. Based on retained corporate records, current management believes that in the good faith but unfortunately mistaken belief that the filing of a tariff was the only federal regulatory requirement regarding the initiation of international telecommunications service, the company began offering international service in 1998. International service is provided as a convenience to its customers, and constitutes, on average, less than five percent of PINS’s telecommunications services revenues.

Until the proposed transaction initiated an independent regulatory review, PINS had believed that it was operating in compliance with all regulatory obligations. Promptly upon confirming the fact of non-compliance, PINS initiated the preparation of this application and its companion application for permanent authorization. PINS acknowledges that the grant of this STA will not prejudice any action the Commission may take on the underlying application for permanent authorization, or the contemplated subsequent application seeking Commission consent to transfer of the authorization. PINS further acknowledges that this STA can be revoked by the Commission on its own motion without a hearing.

Good cause exists for grant of the instant request. Grant would ensure that PINS’s customers would not suffer inconvenience or loss of service, or otherwise be affected adversely. Having become aware of its oversight, PINS is voluntarily attempting to take all steps necessary to rectify the situation as promptly as

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**Response to Question 10 (continued)**

possible. Accordingly, PINS submits that the public interest would be served by prompt grant of this request for STA.

**Response to Question 16**

Applicant PINS has not previously been granted international Section 214 authority. Applicant seeks authorization to operate as a resale carrier pursuant to the terms and conditions of Section 63.18(e)(2) to resell the international services of authorized US common carriers for the provision of international switched, private line, data, television and business services to all international points, and to resell private lines for the purpose of providing international basic switched services to countries found to offer equivalent resale opportunities. Accordingly, Sections 63.18(e)(3) and 63.18(g) are not applicable.