

**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 EXTENSION OF SPECIAL TEMPORARY AUTHORITY**

BPP Telecom International USA, LLC. (“BPP Telecom”) by its attorneys, hereby requests an Extension of Special Temporary Authority set to expire on March 12, 2011 in order 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 provides international long distance calling services to carriers and end-user consumers within the United States and Internationally. BPP Telecom previously submitted, and was previously granted, a request for Special Temporary Authority contemporaneously with its International Section 214 Application to operate pursuant to 47 U.S.C. § 214. This authority is set to expire on Saturday March 12, 2011. BPP Telecom seeks this extension of special temporary authority to keep compliant with the Commission’s Rules. BPP Telecom is a small-sized company in the United States that is currently owned by a foreign owner (SOAM – South American Telecom Corporation, herein called “SOAM”) who has previously invested the necessary money and resources into the BPP Telecom to maintain services. SOAM acquired BPP in May of 2010. BPP Telecom had traditionally operated as an International VoIP Reseller in the international wholesale market of Voice over Internet Protocol (VoIP) sector. Prior to the sale of stock acquisition by SOAM,

prior BPP Telecom management had entered into agreements with common carriers to provide services more akin to telecommunication services as opposed to VoIP. At that time, BPP Telecom sought Section 214 authority from the Commission, but had voluntarily dismissed its application pending the sale of the company and pending final approval of carrier contracts by U.S. carriers. These carrier contracts eventually became effective shortly after the closing of the BPP Telecom's change of ownership to SOAM. Upon purchase, SOAM inherited these contractual obligations and in post transaction must perform upon these obligations.

BPP Telecom has previously applied for Section 214 authority from the Commission for this purpose under File # ITC-214-20100713-00279. That application has been referred to the Executive Branch for consent as to the final grant of authority and is pending their final consent to transaction and authority. The Executive Branch has previously consented to BPP Telecom's existing Special Temporary Authority, and as of March 7<sup>th</sup> 2011 has consented to any Extension of the Special Temporary Authority. BPP Telecom now seeks an extension of special temporary authority only for sufficient time that the Commission and the Executive Branch may complete their review of BPP Telecom's application under file# ITC-214-20100713-00279. This is estimated to be a four (4) to six (6) month period.

#### **REQUEST FOR EXTENSION OF SPECIAL AUTHORITY**

BPP Telecom hereby request an extension of its 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. 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.<sup>1</sup> 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

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<sup>1</sup> 47 U.S.C. § 214(a).

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 <sup>2</sup> 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 provision of international service under Team Telecom Review.<sup>3</sup> To avoid any possibility of violation of the Act, BPP Telecom hereby submits this request for an extension of its Special Temporary Authority

### IMPACT STATEMENT

The grant of this STA extension request will serve the public interest, convenience and necessity because such grant will permit BPP Telecom to provision regulated services inherited by the new ownership to all who will rely on the company for their telecommunication needs. The grant of this STA extension will further ensure that BPP Telecom can continue to meet the needs of its wholesale and resale customers while its underlying application for authority is considered by the Commission. Likewise, BPP Telecom is a small, new entrant provider to the telecommunications sector, and the application does not raise anti-competitive concerns.

BPP Telecom 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. BPP Telecom further acknowledges that grant of this STA may be revoked by the Commission upon its own motion without hearing.

### 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

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<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.

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: Christiane Goncalves

Ms. Christiane Goncalves \_\_, Director/Manager

By and through its attorney:

Edward A. Maldonado, Esq.

Regulatory Counsel for BPP Telecom International USA, LLC.

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

I, Christiane Goncalves, 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 forgoing is true and correct

BPP Telecom, LLC.

By : Christiane Goncalves

Ms. Christiane Goncalves , Director/Manager