

EXHIBIT A – JUSTIFICATION FOR SPECIAL TEMPORARY AUTHORITY

TA Resources N.V. (“TA Resources”), by its undersigned counsel, pursuant to Section 214 of the Communications Act of 1934, as amended, and Section 63.25 of the Commission’s Rules, 47 C.F.R. § 63.25, hereby requests extension of the Special Temporary Authority (“STA”) to continue providing international telecommunications services between the United States and various international points for the urgent reasons set forth herein. TA Resources seeks such extension in order to continue satisfying existing customer contracts and obligations to provide international services pending grant of TA Resources’ Section 214 application for regular authority.¹

STA was granted by the Commission on November 29, 2010 and expires on May 28, 2011. A six month additional extension of the STA is now requested to allow additional time for the Commission to complete its review of TA Resources’ Section 214 application. TA Resources respectfully requests that the Commission grant this STA request not later than May 27, 2011 to avoid a lapse in authorization.

By way of background, TA Resources applied for Section 214 authority on January 7, 2010. TA Resources Application was placed on Public Notice February 5, 2010. No party filed comments expressing concern about the Application. Nor did any party file a pleading seeking to deny or restrict TA Resources’ desired authority to provide international telecommunications. The Executive Branch through the Departments of Justice and Homeland Security requested and received information regarding TA Resources in February 2010, and continue to review the Application.

Extension of STA is urgently required at this time to ensure that TA Resources is capable to continue operating telecommunications infrastructure between Aruba and the U.S. needed to ensure continuity of service for existing customers in Aruba. Under its existing STA, TA Resources is using co-location facilities in Miami as a hub for international traffic. The facilities serves as a lifeline for existing customers in Aruba. If TA Resources is unable to continue operating its international facilities interconnecting Aruban telecommunications infrastructure with facilities in Miami, Florida, existing Aruban customers may experience significant disruptions of service.

Grant of STA extension will serve the public interest by ensuring that Aruban customers continue to enjoy reliable access to international telecommunications and Internet infrastructure without interruption during the continued pendency of TA Resources’ Application. Grant of STA will also promote Miami as an international telecommunications hub, and eliminate the need for TA Resources to identify alternative facilities outside the U.S. capable of accommodating Aruban international traffic

¹ See FCC File No. ITC-214-20100107-00010 (“Application”).

As described in its Section 214 application, TA Resources' parent, SETAR N.V. ("SETAR"), is a foreign carrier deemed by the FCC to hold market power in Aruba. TA Resources has agreed to be classified as dominant with respect to the U.S.-Aruba route, without prejudice to its right to petition for reclassification at a later date. TA Resources has also agreed to file quarterly traffic reports pursuant to Section 43.61(c) of the Commission's Rules with respect to this route.

TA Resources is interconnecting Aruban telecommunications infrastructure with facilities in Miami using operational submarine cable systems. TA Resources has access to the Americas-1, Columbus-II, PANAM and Alonso De Ojeda cable systems. It is approximately 1,800 "airline kilometers" between Aruba and the planned facilities in Miami.

Accordingly, TA Resources respectfully requests an extension of Special Temporary Authority. TA Resources acknowledges that grant of this request will not prejudice action by the Commission on its Section 214 application and that any authority granted pursuant to this request is subject to cancellation or modification upon notice, but without a hearing.

Please direct any inquiries regarding this matter to Ulises R. Pin at 202.373.6664.