

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

In the Matter of:)
)
Teledirek Global Corp.)
And)
) **File No. ITC-214-20120801-00193**
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

Teledirek Global Corp. (“Teledirek”) 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”). In support of this request, Teledirek states as follows:

BACKGROUND

Teledirek is a small-sized Florida corporation that desires to provide international long distance calling services to end-user consumers within the United States and Internationally. Teledirek has previously applied for streamline International authority to operate pursuant to 47 U.S.C. § 214, and was removed from streamline processing for review by Team Telecom because of its foreign ownership by Canadian and Haitian nationals.¹ Since its removal from streamline processing, Teledirek has received and responded to its first set of triage questions from the Executive Branch as a part of Team Telecom Review, and as of this date, has not received any further supplemental questions from the Executive Branch. Teledirek now seeks Temporary Section 214 Authority at this time so that it may operate during the application process. This is necessary so that the applicant can perform under carrier agreements; utilize carrier deposits already placed with carriers that may otherwise be lost; and, offer services to the

¹ See. Teledirek Global Corp.’s Application for Authority to provide international facilities-based and resold services File Number ITC-214-20120801-00193 submitted 07/17/2012.

public while its foreign owners are being reviewed by Team Telecom. The foregoing is critical to ensure a successful upstart of the company, and its services at this time. Teledirek understands the need and requirement for Team Telecom review, however, the applicant needs to begin providing services immediately so its business plans and purposes come to fruition, and are not completely frustrated.

Teledirek applied for Section 214 authority from the Commission under File No.: ITC-214-20120801-00193 on July 17, 2012 indicating to the Commission that it does have foreign ownership interests in the company. As of August 31, 2012 the applicant's file has been set for Public Notice, and has been removed from streamline processing for referral to the Executive Branch. Teledirek recognizes that the Executive Branch's review process is not streamlined and may toll for a period of time of a year or longer than the end of fiscal year 2012. Teledirek believes that Special Temporary Authority is proper to not frustrate its business purpose and to allow the Commission and Executive Branch proper time to review Teledirek's qualifications for Section 214 Authority. Teledirek herein seeks such special and temporary authority only for sufficient time that the Commission and the Executive Branch may complete their review of Teledirek's application under File Number ITC-214-20120801-00193 and is willing to submit extensions of any STA granted to cover such time periods. In the event Teledirek is denied permanent authority by the Commission, tentative emergency arrangements will be made by the applicant with other carriers to temporarily sustain service for a very limited period to ensure customer services and continuity of services. This has been established by Teledirek only as a contingency of last resort - as the telecommunication business of Teledirek would be entirely frustrated in such an event.

REQUEST FOR SPECIAL AUTHORITY

Teledirek 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 Teledirek's circumstances in acquiring a small base of end-user clients. Teledirek 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.*² Teledirek recognizes that it is required to

² 47 U.S.C. § 214(a).

obtain Section 214 Authority prior to the rendering of International Telecommunication Services to the public. Teledirek submits that it is undertaking an affirmative effort to be compliant with the Act and the Commission's Rules by seeking this Special Authority. Teledirek is prepared to meet all 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.

Teledirek further recognizes that application to the Commission pursuant to 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 Special Temporary Authority request.³ In making its request for Special Temporary Authority, Teledirek acknowledges that its foreign ownership will require consultation by the Commission with the Executive Branch agencies in regard to national security, law enforcement, foreign policy and trade issues and concerns that are unique to Team Telecom Review.⁴ It is acknowledged that such review is not streamlined, and the Commission as well as Team Telecom may require time to review Teledirek's full Application for Section 214 Authority. This process may take several months to a year, and Teledirek does not wish to be in violation of the Act during this time period where it must provide services to sustain its market entry and support end-users it will assume from another carrier. To avoid any possibility of violation of the Act, Teledirek hereby submits this Request for Special Temporary Authority.

IMPACT STATEMENT

The grant of this STA request will serve the public interest, convenience and necessity because such grant will permit Teledirek to provide regulated services to the clients that Teledirek will assume in fiscal year 2012 and who will rely on Teledirek for their telecommunication needs thereafter. The grant of this STA will further ensure that Teledirek can continue to meet the needs of the telecommunication clients it will be transitioned while its underlying application for authority is considered by the Commission. Likewise, Teledirek is a small, new entrant provider to the telecommunications sector, and the application does not raise anti-competitive concerns.

³ 47 C.F.R. § 63.18.

⁴ See. *1998 International Biennial Review Order*, 14 FCC Rcd at 4914-15 ¶ 14; *PCIA Forbearance Order*, 13 FCC Rcd at 16882 ¶ 50.

Teledirek 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. Teledirek further acknowledges that grant of this STA may be revoked by the Commission upon its own motion without hearing. In the event Teledirek is denied authority or the STA is revoked by the Commission without grant of final authority, tentative emergency arrangements have been made with other carriers to temporarily sustain service for a very limited period as a contingency of last resort.

CONCLUSION

For the above reasons, Teledirek Global Corp. 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 Teledirek'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,

Teledirek Global Corp.

By : /s/ Charles Eveillard /s/

Mr. Charles Eveillard, President and Director

By and through its attorney for this application:

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Please Direct STA Petition Correspondence to above Regulatory Counsel.

REQUEST FOR SPECIAL TEMPORARY AUTHORITY
Verification by Corporate Officer

I, Charles Eveillard, President and Director of Teledirek Global Corp. 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

Teledirek Global Corp.

By : By : /s/ Charles Eveillard /s/

Charles Eveillard,

President and Director