

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

In the Matter of: )  
 )  
**Teledirek Global Corp.** )  
 )  
 ) **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 AN EXTENSION OF SPECIAL TEMPORARY AUTHORITY**

Teledirek Global Corp. (“Teledirek”) by its attorneys, hereby requests an extension of its existing 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.<sup>1</sup> Since its removal from streamline processing, Teledirek has received and responded to 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 an extension of its existing Temporary Section 214 Authority so that it may continue to operate during the application process. Presently, Teledirek’s application is under review by the Executive Branch – Team Telecom. Final consent by the Executive Branch on the underlying application has not

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<sup>1</sup> 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.

been given as of this date. However the Executive Branch has previously consented to Teledirek's existing Special Temporary Authority (STA) and as of April 16, 2013 has consented to an extension of this STA request.

Teledirek herein requests an extension of special 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. In the event Teledirek is denied permanent authority by the Commission, emergency arrangements have been made by Teledirek 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 otherwise be frustrated under such an event.

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

Teledirek hereby request an Extension of its existing Special Temporary Authority to temporarily provide international telecommunications services and to operate pursuant to 47 U.S.C. § 214 for a six (6) month period that may be extended by further petition. 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.*<sup>2</sup> Teledirek recognizes that it is required to 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 shall 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 requires 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

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<sup>2</sup> 47 U.S.C. § 214(a).

Special Temporary Authority request.<sup>3</sup> In making its request for an Extension of Special Temporary Authority, Teledirek acknowledges that its foreign ownership in its organization will require consultation between the Commission and Executive Branch agencies in regard to national security, law enforcement, foreign policy and trade issues and concerns that are unique to Team Telecom Review.<sup>4</sup> 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 more time, and Teledirek does not wish to be in violation of the Act during this time period where it must continue to sustain services to its end-users. To avoid any possibility of violation of the Act, Teledirek hereby submits this Request for an Extension of its 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 its clients, who have relied on Teledirek for their telecommunication services during the initial STA. The grant of this extension of the STA will further ensure that Teledirek can continue to meet the needs of the telecommunication clients 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.

Teledirek acknowledges that the grant of this extension of existing STA 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.

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<sup>3</sup> 47 C.F.R. § 63.18.

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

**CONCLUSION**

For the above reasons, Teledirek Global Corp. respectfully requests that the Commission grants it an extension of its 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:

**Edward A. Maldonado, Esq.**  
**Regulatory Counsel for Teledirek Global Corp.**  
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**Please Direct STA Petition Correspondence to above Regulatory Counsel.**

**REQUEST FOR AN EXTENSION OF 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 forgoing is true and correct

Teledirek Global Corp.

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

Charles Eveillard,

President and Director