



Federal Communications Commission
Washington, D.C. 20554

International Bureau

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May 16, 2013

Ref: EB 2013-14

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Re: Section 214 Applications and STAs

**Comments Due: May 22, 2013 for STAs
June 5, 2013 for Section 214 Applications**

Dear Sir or Madam:

Please review the following applications and advise us whether you have any national security, law enforcement, foreign policy or trade concerns. **Electronic filed (e-file) applications are able to be viewed by accessing www.fcc.gov/ibfs and searching by the file number.**

ITC-214-20130426-00122 (e-file)

3GTY, Inc.'s application for authority to provide international resold service to **China**. Two citizens of **China**, each of whom owns 50% of the applicant.

ITC-T/C-20130514-00136 (e-file)

Cascabel Networks LLC seeks Commission approval for the transfer of control of its international section 214 authorization, ITC-214-20070425-00160. The transaction was consummated on January 1, 2011. The following individuals hold 10% or greater ownership interest in Cascabel: Simon Marsi, a citizen of **Mexico** (30.5%); Ricardo Flores, a U.S. citizen (30.5%); and Salomon Marsi, a citizen of **Mexico**, (30.5%).

ITC-STA-20130514-00137 (e-file)

Cascabel Networks LLC requests Special Temporary Authority (STA) for a period of 180 days to continue to provide international facilities-based and resold services while the underlying application **ITC-T/C-20130514-00136** is pending.

ITC-T/C-20130514-00138 (e-file)

IPBTEL LLC seeks Commission approval for the transfer of control of its international Section 214 authorization, ITC-214-20040426-00159. The transaction was consummated on January 1, 2008. The following individuals hold 10% or greater ownership interest in IPBTEL: Simon Marsi, a citizen of **Mexico** (30.5%); Ricardo Flores, a U.S. citizen (30.5%); and Salomon Marsi, a citizen of **Mexico**, (30.5%).

ITC-STA-20130514-00139 (e-file)

IPBTEL LLC requests Special Temporary Authority (STA) for a period of 180 days to continue to provide international facilities-based and resold services while the underlying application **ITC-T/C-20130514-00138** is pending.

We request your consent to grant the STAs by **May 22, 2013**, and comments on the section 214 applications by **June 5, 2013**. If we do not receive your comments on the section 214 applications by **Noon June 5, 2013**, we will assume that you do not have any concerns with the above listed applications and the applications **will be auto-granted on June 7, 2013 per Commission's rules, 47 C.F.R. § 63.12.**

Sincerely

George Li, Deputy Chief, Policy Division

George Li

From:

Sent:

To:

Adrienne Downs
Thursday, May 16, 2013 4:47 PM

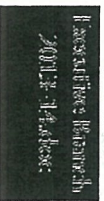
'edward.hand@usdoj.gov'; 'Morgan, Hillary J CIV (US)' (hillary.j.morgan.civ@mail.mil);
'chemmertlein@ntia.doc.gov'; 'maydc@state.gov'; 'Christopher.Siefken@ic.fbi.gov';
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'john.delmore@ic.fbi.gov'; 'twg@leo.gov'; 'mark.mcconnell@usdoj.gov';
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George Li; David Krech; Susan OConnell; Howard Griboff; James Ball

Cover Letter Reference EB 2013-14 (comments due by May 22, 2013 and June 5, 2013)

Cc:
Subject:

Cover Letter Reference EB 2013-14 (comments due by May 22, 2013 and June 5, 2013)



Adrienne Downs
International Bureau, FCC
(202) 418-0412
Adrienne.Downs@fcc.gov

Re: ITC-TC-20130514-00136

Granted MAY 22 2013

Policy Division
International Bureau

date: Expires Nov 18, 2013
authorized by: _____

Chief, Policy Div. IS
James L. Reed

Signature

Applicant acknowledges the conditions of STA as stated below.

Cascabel Networks, LLC
Request for Special Temporary Authority

ATTACHMENT 1
Page 1

RESPONSE TO QUESTION 10

Cascabel Networks, LLC ("Applicant" or "Cascabel"), pursuant to 47 C.F.R. § 63.25, hereby requests Special Temporary Authority ("STA") for a period of one-hundred eighty (180) days. Applicant requests STA as a remedial measure for an unauthorized transfer of control while a separately filed application for transfer of control its international Section 214 authority ("Transfer Application") is pending. Regrettably, Applicant was unaware that the change in member interests (the "Transaction") described in its Transfer Application also would be considered a transfer of control of international Section 214 authority requiring prior Commission approval.

As explained in the underlying Transfer Application, Applicant believes that international Section 214 authority is arguably unnecessary for the types of service it provides. The only service offered by Applicant is the international termination of voice over internet protocol (VoIP) traffic originated by unaffiliated carrier customers in the U.S. Applicant offers its services only to carrier customers on a private contractual basis (*ie.*, not on a common carrier basis). Notwithstanding the foregoing, Applicant obtained international Section 214 authority for business purposes as some foreign carriers will only contract with U.S. entities which possess such authority.

Applicant recognizes that it is obligated to follow Commission procedures as a grantee of international Section 214 authority. Thus, the Applicant seeks STA as a remedial measure for its unauthorized transfer of control and, to the extent necessary, to continue providing the international services described above while the Transfer Application is pending. Applicant acknowledges that the grant of this STA will not prejudice any action the Commission may take on the underlying Transfer Application. Applicant further acknowledges that this STA can be revoked by the Commission upon its own motion without a hearing, and that grant of an STA and the underlying Transfer Application will not preclude enforcement action.

RESPONSE TO QUESTION 12 AND QUESTION 13

Cascabel is not a foreign carrier. However, upon consummation of the Transaction, Cascabel certifies that it is affiliated with a foreign carrier in Mexico (*ie.*, any entity that is authorized within a foreign country to engage in the provision of international telecommunications services offered to the public in that country) through the ownership interests of its Members. Cascabel seeks to provide international service to Mexico, a country in which it has foreign carrier affiliations through Members who own more than 25% of Cascabel, as described below.

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FILE NO.=625

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Policy Division

FAX SHEET

Fax Number: (202) 418-2824

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DATE: 5/23/13

FROM: George Li

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TO: Chang-Yi Liu

FAX NUMBER: 703-812-0486

TELEPHONE NUMBER: " 0498

SPECIAL INSTRUCTIONS:

17c-57A-20130514-00137 / 17c-71-20130514-02136

00139 00138

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