

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

In the Matter of:)
)
First Technology Development Inc.)
)
And)
) **File No. ITC-214-20130726-00202**
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

First Technology Development Inc. (“First Technology Development”) 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”).

BACKGROUND

First Technology Development is a Delaware corporation which desires to provide international long distance calling services to end-user consumers within the United States and Internationally. First Technology Development is submitting this request for Special Temporary Authority contemporaneously with its International Section 214 Application to operate pursuant to 47 U.S.C. § 214 in a expedited manner. First Technology Development is a small-sized company in the United States that is not affiliated with a foreign dominant carriers holding market control. First Technology Development Inc. is affiliated with a sister company that is a non-dominate telecommunications provider in the Peoples’ Republic of Bangladesh Mir Telecom Ltd. (“Mir Telecom”). Mir Telecom is licensed by the Bangladesh Telecommunication Regulatory

Commission to provide International Gateway Services (IGW) and holds certain carrier agreements with U.S. telecommunication Carriers. Mir Telecom is currently one of twenty-nine (29) competitive licensed operators who can route incoming and outgoing international calls to and from the Peoples' Republic of Bangladesh. Mir Telecom however was one of the first three IGW to have been issued a license by the Bangladesh Telecommunication Regulatory Commission, and has maintained itself in good standing for over a decade. The Applicant further states that the Peoples' Republic of Bangladesh (the country of origin of one of the owners of the Applicant) has been a WTO member since 1995 and has established schedules through the WTO related to the basic telecommunication sector services which should be considered by the Commission. First Technology Development Inc. hereby requests that WTO considerations be applied to that owner and this application by the Commission in any grant of authority.

For this purpose, First Technology Development applied for Section 214 authority from the Commission under File No.: ITC-214-20130726-00202 on July 26, 2013 indicating to the Commission in its application that it does have foreign ownership interests in the company. As of August 14, 2013 the file has been set for Public Notice, but has not been removed from streamline processing for referral to the Executive Branch for approval as foreign investment in the telecommunications sector. First Technology Development recognizes that referral to the Executive Branch for review is essential to any approval by the FCC for the Company to operate pursuant to 47 U.S.C. § 214. First Technology Development also 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 2013. First Technology Development believes that Special Temporary Authority is proper to not frustrate its present investment into efforts to interconnect with carrier and roll-out deployment of future services. First Technology Development seeks such special and temporary authority only for sufficient time that the Commission and the Executive Branch may complete their review of First Technology Development's application under File Number ITC-214-20130726-00202 and is willing to submit extensions of any STA granted to cover such time periods. In the event First Technology Development is denied permanent authority by the Commission, tentative emergency arrangements have been made with other carriers to temporarily sustain service for a very limited period. This has been established by First Technology Development only as a contingency of last resort - as the

telecommunication business of First Technology Development would be entirely frustrated in such an event.

REQUEST FOR SPECIAL AUTHORITY

First Technology Development 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 First Technology Development’s circumstances in acquiring a small base of end-user clients. First Technology Development 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.*¹ First Technology Development recognizes that it is required to obtain Section 214 Authority prior to the rendering of International Telecommunication Services to the public. First Technology Development submits that it is undertaking an affirmative effort to be compliant with the Act and the Commission’s Rules by seeking this Special Authority. First Technology Development 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.

First Technology Development 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

¹ 47 U.S.C § 214 (a).

required and has done so a pre-requisite to this STA request.² In making its request for Special Temporary Authority, First Technology Development 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.³ It is acknowledged that such review is not streamlined, and the Commission as well as Team Telecom may require time to review First Technology Development's full Application for Section 214 Authority. This process may take several months to a year, and First Technology Development 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, First Technology Development 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 First Technology Development to provide regulated services to the clients and carriers that First Technology Development will serve. The grant of this STA will further ensure that First Technology Development can continue to meet the needs of the telecommunication clients and carrier it may do business with while underlying application for authority is considered by the Commission. Likewise, First Technology Development is a small, new entrant provider to the telecommunications sector, and the application does not raise anti-competitive concerns.

First Technology Development 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. First Technology Development further acknowledges that grant of this STA may be revoked by the Commission upon its own motion without hearing. In the event First Technology Development is denied authority or the STA is revoked by the Commission without grant of final authority, tentative

² 47 C.F.R. § 63.18.

³ See, *1998 International Biennial Review Order*, 14 FCC Rcd at 4914-15 ¶ 14; *PCIA Forbearance Order*, 13 FCC Rcd at 16882 ¶ 50.

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, First Technology Development Inc. 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 First Technology Development'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,

First Technology Development Inc.

By : **/s/ Mahreen Nasir /s/**

Ms. Mahreen Nasir, Director and Shareholder

By and through its attorney for this application:

Edward A. Maldonado, Esq.

Limited Regulatory Counsel for First Technology Development, for the purpose of this Request for special temporary authority.

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Please Direct STA Petition Correspondence to above Regulatory Counsel.

REQUEST FOR SPECIAL TEMPORARY AUTHORITY
Verification by Corporate Officer

I, Mahreen Nasir, Director and Shareholder of First Technology Development a Delaware 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

By : /s/ Mahreen Nasir /s/

Director and Shareholder of First Technology Development, Inc.