



Federal Communications Commission
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International Bureau

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September 5, 2013
Ref: EB 2013-25

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Re: STAs and Section 214 Applications

Comments on STAs Due: September 16, 2013
Comments on Section 214 Applications Due: September 25, 2013

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 by **Noon September 16, 2013** for STAs, and **September 25, 2013** for Section 214 applications, because we are prepared to take action on these applications. **Electronic filed (e-file) applications are able to be viewed by accessing www.fcc.gov/ibfs and searching by the file number.**

ITC-214-20130823-00224 (e-file)

NGP Tele, Inc.'s application for authority to provide facilities-based and resale services between the United States and permissible international points. Applicant is 100% owned by a citizen of **Israel**.

ITC-STA-20130823-00220 (e-file)

First Technology Development, Inc.'s application for Special Temporary Authority (STA) to provide international telecommunications services while its underlying application, ITC-214-20130726-00202, is pending under TT/DOJ's review. (See EB 2013-24, August 22, 2013). Please comment on this STA request by **September 16, 2013**.

ITC-214-20130507-00229 (e-file)

Dharm, Inc.'s application for authority to provide facilities-based and resale services between the United States and permissible international points. Applicant is 100% owned by a citizen of **India**.

ITC-214-20130827-00232 (e-file)

Mobile Financial Services, LLC's application for authority to provide resale services between the United States and permissible international points. Applicant is located in

the United Kingdom, and is wholly owned by a **British** company, which is indirectly owned and controlled by a **British** citizen.

ITC-STA-20130827-00233 (e-file)

Mobile Financial Services, LLC (MFS) requests Special Temporary Authority (STA) to provide international resale services between the United States and permissible international points while its underlying application ITC-214-20130827-00232, is pending under TT/DOJ's review. MFS seeks to operate as a Mobile Virtual Network Operator (MVNO). Applicant is located in the United Kingdom, and is wholly owned by a **British** company, which is indirectly owned and controlled by a **British** citizen. Please comment on this STA request by **September 16, 2013**.

ITC-T/C-20130816-00211 (e-file)

Application for consent to transfer the control of LIGA Telecom, Inc. (holder of ITC-214-20120514-00126) from Mr. Dmytro Artemenko to Mr. Yaroslav Donchenko, a citizen of **Romania**. Without Commission's approval, the transaction was completed on November 17, 2012.

ITC-STA-20130816-00219 (e-file)

LIGA Telecom, Inc.'s application for Special Temporary Authority to continue to provide international telecommunication services to customers pending Commission's approval of its underlying application (ITC-T/C-20130816-00211) for consent to transfer the control of LIGA Telecom, Inc. from Mr. Dmytro Artemenko to Mr. Yaroslav Donchenko, a citizen of **Romania**. Without Commission's approval, the transaction was completed on November 17, 2012. Please comment on this STA request by **September 16, 2013**.

If we do not hear from you by **Noon September 25, 2013**, regarding the Section 214 applications, we will assume that you do not have any concerns with these applications and these **applications will be auto-granted on September 27, 2013 per Commission's rules. 47 C.F.R. § 63.12.**

Veronica Garcia-Llloa

From: Veronica Garcia-Llloa
Sent: Thursday, September 05, 2013 3:40 PM

To: 'Edward.Hand@usdoj.gov'; 'chemmerlein@ntia.doc.gov'; 'maydc@state.gov';
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George Li; David Krech; Susan OConnell; Howard Griboff; James Ball; Adrienne Downs
Subject: Cover Letter Reference EB 2013-25 (comments due for STAs by September 16, 2013;
comments due for Section 214 Applications by September 25, 2013)
Attachments: Executive Branch 2013-25.doc

Cover Letter Reference EB 2013-25 (comments due for STAs by September 16, 2013; comments due for Section 214 Applications by September 25, 2013)

Thank you,

Veronica Garcia-Llloa
Veronica.Garcia-Llloa@fcc.gov
Law Clerk

Streamlined ITC-STA-20130827-00233
IB2013001880
Mobile Financial Services, LLC

Re: ITC-214-20130827-02232

Granted
DEC 11 2013

Policy Division
International Bureau

date	EXPIRES: June 9, 2014
authorized by	Chief, Policy Div IB
signature	James R. Rao

Applicant acknowledges the conditions of STA.

ATTACHMENT 1

Application Of Mobile Financial Services, LLC For Special Temporary Authority To Provide International Resold Services

Pursuant to Section 63.25 of the Commission's rules, Mobile Financial Services, LLC ("MFS") requests special temporary authority ("STA") to provide international telecommunications services on a resale basis between the United States and all international points (except any points on the Commission's exclusion list). MFS also is filing contemporaneously an application seeking a Section 214 authorization to provide international telecommunications services on a resale basis ("Section 214 Application").

Answer to Question 10 (Justification of Need for STA)

As explained in the Section 214 Application, MFS is a wholly-owned direct subsidiary of TeleWare Group Plc, a British company, and is indirectly owned and controlled by Geoffrey Richard Haworth, a British citizen. MFS therefore anticipates that the Section 214 Application will be subject to review by the Departments of Justice, Homeland Security and Defense and the Federal Bureau of Investigation ("Team Telecom") for national security concerns. MFS requests this STA for authority to provide international telecommunications services during the Section 214 Application process.

MFS seeks to operate as a Mobile Virtual Network Operator ("MVNO") in the United States. MFS intends to enter the market to serve a niche group of enterprise companies that have a mobile workforce and a new federal regulatory obligation to record and retain certain calls. MFS fully understands Team Telecom's review, and seeks the STA so to help enable timely compliance with the new federal rules.

Accordingly, MFS requests that the Commission grant an STA as soon as possible, and no later than November 1, 2013, for a period of 180 days. Grant of this STA request would allow MFS to provide international telecommunications services while the Commission and Team Telecom continue to consider the Section 214 Application and MFS responds to any questions Team Telecom may have. Thus, the STA serves the public interest.

MFS acknowledges that the grant of this STA will not prejudice any action the Commission may take on the underlying Section 214 Application. MFS further acknowledges that this STA can be revoked by the Commission upon its own motion without a hearing.

Answer to Question 16 (Responses to 47 C.F.R. §§ 63.18(d), (e)(3) and (e))

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Policy Division

FAX SHEET

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DATE: 12/11/13

FROM: George G, I

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TO: Adam Krinsky

FAX NUMBER: 202-783-5851

TELEPHONE NUMBER: 4141

SPECIAL INSTRUCTIONS: ITC-214, 20130827-00232

ITC-STA-20130827-02233

THIS COVER SHEET IS PAGE 1 OF 2 PAGES.