

RESPONSE TO QUESTION 10

Cascabel Networks, LLC (“Applicant” or “Cascabel”), pursuant to 47 C.F.R. § 63.25, hereby requests that its Special Temporary Authority (“STA”) be extended for a period of one-hundred eighty (180) days from May 16, 2014, the date on which its current STA extension expires.¹ Applicant requests extension of its STA while a separately filed application (File No. ITC-T/C-20130514-00136) for transfer of control of its international Section 214 authority (“Transfer Application”) is pending. The Transfer Application is still under review by the “Team Telecom” executive branch agencies.

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 (*i.e.*, 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 this STA extension 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 extension will not prejudice any action the Commission may take on the underlying Transfer Application. Applicant further acknowledges that this STA extension can be revoked by the Commission upon its own motion without a hearing, and that grant of an STA extension 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 (*i.e.*, 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.

¹ Applicant’s initial STA (File No. ITC-STA-20130514-00137) expired November 18, 2013. Subsequently, Applicant obtained an STA extension (File No. ITC-STA-20131107-00310) through May 16, 2014.

Mr. Simon Masri, a 30.5% Member of Cascabel, either controls or has a greater than 25 percent ownership interest in the following entities which are authorized within a foreign country to engage in the provision of international telecommunications services to the public in that country:

Foreign Carrier Name	Country
Bicentel SA de CV	Mexico

Mr. Ricardo Flores, a 30.5% Member of Cascabel, either controls or has a greater than 25 percent ownership interest in the following entities which are authorized within a foreign country to engage in the provision of international telecommunications services to the public in that country:

Foreign Carrier Name	Country
Bicentel SA de CV	Mexico

Mr. Salomon Masri, a 30.5% Member of Cascabel, either controls or has a greater than 25 percent ownership interest in the following entities which are authorized within a foreign country to engage in the provision of international telecommunications services to the public in that country:

Foreign Carrier Name	Country
Bicentel SA de CV	Mexico

Mexico is a member of the World Trade Organization. Furthermore, Cascabel qualifies for a presumptive classification as non-dominant under Section 63.10(a)(3) of the Commission's rules. Cascabel's foreign affiliate, as described above, is not a monopoly provider of telecommunications services in Mexico. The foreign affiliate lacks 50% of the market share in the international transport and the local access markets on the foreign end of the applicable route. Accordingly, Cascabel would be presumptively classified as non-dominant with respect to the U.S.-Mexico route.²

² See 47 C.F.R. § 63.10(a)(3). Furthermore, the Commission presumes that Telefonos de Mexico (TelMex), which is unaffiliated with the instant Applicant, is the foreign carrier which possesses market power in the destination market of Mexico. See *The International Bureau Revises and Reissues the Commission's List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets*, Public Notice, DA 07-233, January 26, 2007.

RESPONSE TO QUESTION 16

Section 63.18(d): Applicant has previously received authority under Section 214 of the Act to provide facilities-based, Section 63.18(e)(1), and resale, Section 63.18(e)(2), international services under File No. ITC-214-20070425-00160 (granted 12/13/2007).

Section 63.18(e)(3): Applicant requests no authority other than those under Section 63.18(e)(1) and Section 63.18(e)(2) of the Commission's rules. Applicant certifies that it will comply with the terms and conditions contained in §§ 63.21 and 63.22 and/or 63.23, as appropriate.

Section 63.18(g): Applicant is not seeking facilities-based authority under 63.18(e)(3).