

Application for Special Temporary Authority Under Section 214 of the Act

Attachment 4

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DIODE TELECOM, INC.

The parties acknowledge that the grant of this STA will not prejudice any action the Commission may take on the underlying application. The parties further acknowledge that this STA can be modified or revoked by the Commission upon its own motion without a hearing.

Re: ITC 214-20141118-00302

Granted	NOV 26 2014
Policy Division International Bureau	
date:	EXPIRE: JAN 26, 2015
authorized by:	Brief: Policy Div. IB
signature:	Arnold H. Hoff for James Bell
Applicant acknowledges the conditions of STA.	

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DIODE TELECOM, INC.

Response to Question 10

Diode Telecom, Inc. ("Diode") respectfully seeks Special Temporary Authority ("STA") for the provision of resold international services pending grant of its application for permanent Section 63.18(e)(2) authorization filed simultaneously. Diode has recently discovered that in the course of arranging to provide resold domestic and international long distance service to the subscribers of its parent, Diller Telephone Company, in 2013 it failed to obtain authorization pursuant to Section 214 of the Communications Act to provide international service. Diode now seeks such authority through these temporary and permanent applications. Prompt grant of its request for STA will serve the public interest by allowing it to continue uninterrupted international service to its customers.

Diode's parent, Diller Telephone Company ("Diller"), is presently involved in similar efforts to correct a Domestic transfer of control issue. Upon discovery of this issue, Diller promptly caused a review of the authority status of each of its subsidiaries and thus became aware of the failure of Diode to obtain international authority in 2013. Although Diode's 2013 international traffic revenues fell below the \$5 million threshold for filing annual traffic reports, it was also unaware of its obligation to file a letter so stating. That letter is now being filed.

Diode and its parent are instituting material changes to their internal processes for ensuring compliance with all applicable regulatory obligations. These changes include an audit of all obligations and establishment of a regulatory calendar of all recurring obligations.

The Public Interest will be served by a grant of this application. Because a substantial proportion of Diller's local exchange telephone subscribers have chosen Diode as their Primary Interexchange Carrier, discontinuance of service during the pendency of Diode's permanent application would cause substantial inconvenience to its subscribers.

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Response to Question 16

Applicant Diode has not previously been granted international Section 214 authority. Diode seeks authorization to operate as a resale carrier pursuant to the terms and conditions of Section 63.18(e)(2) to resell the international services of authorized US common carriers for the provision of international switched, private line, data, television and business services to all international points, and to resell private lines for the purpose of providing international basic switched services to countries found to offer equivalent resale opportunities. Accordingly