

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

In the Matter of: )  
)  
**America Net Communication LLC** )  
And )  
)  
Application for Special Temporary )  
Authority to Offer International Services )  
Pursuant to Section 214 of the )  
Communications Act of 1934, as Amended )

**File No. ITC-214-20140522-00160**

**REQUEST FOR EXTENSION OF SPECIAL TEMPORARY AUTHORITY**

America Net Communication LLC ("America Net") by its attorneys, hereby requests an extension of 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 Extension 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"). In support of this request, America Net states as follows:

**BACKGROUND**

America Net is a small-sized Florida limited liability company that desires to provide international long distance calling services to end-user consumers within the United States and Internationally. On May 21, 2014 America applied for streamline International authority to operate pursuant to 47 U.S.C. § 214 under File ITC-214-20140522-00160. On May 30, 2014, America Net applied for and was granted special temporary authority to provide services between U.S. and Brazil with expiration of that authority on August 11, 2014. On August 11, 2014, America Net applied for and was granted special temporary authority to provide services between U.S. and Brazil with expiration of that authority on October 31, 2014. Since October 31, 2014, America Net applied for and was granted a further special temporary authority to provide

services between U.S. and Brazil with expiration of that authority on December 31, 2014. In the time since the issuance of the STA, America Net has received questions from Team Telecom and responded punctually. However, as of this date, the Team Telecom review and investigation is still ongoing with the applicant. Since its last grant of special temporary authority America Net has provided and continues to provide services between the United States and Brazil without interruption or any issue that has adversely affected U.S. consumers.

America Net now seeks an extension of the authority previously given to keep a continuity of services to consumers between the U.S. and Brazil, and avoid interruption of services by virtue of closing off and shutting down all services when the previous STA expires. America Net seeks this extension of authority to continue providing services previously approved, up and until the end of March 2015, which should be ample time for any further Team Telecom Review of its single owner and management. America Net fully understands the importance and requirement for Team Telecom review and does not desire to side-step this process by virtue of this special temporary authority.

America Net herein seeks an extension of its previously granted special and temporary authority only for sufficient time that the Commission and the Executive Branch may complete their review of America Net's application under File Number ITC-214-20140522-00160 and is willing to submit further extensions of any STA granted to cover such time periods.

In the event America Net is denied permanent authority by the Commission, tentative emergency arrangements will be made by the applicant with other carriers to temporarily sustain service for a very limited period to ensure carrier and customer services continue and there is a continuity of services. This has been established by America Net only as a contingency of last resort.

### **REQUEST FOR SPECIAL AUTHORITY**

America Net hereby requests an extension of its existing Special Temporary Authority to temporarily provide international telecommunications services between the United States and Brazil 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

up and until March 30, 2015 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 America Net's circumstances.

America Net 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. America Net recognizes that it is required to obtain Section 214 Authority prior to the rendering of International Telecommunication Services to the public. America Net submits that it is undertaking an affirmative effort to be compliant with the Act and the Commission's Rules by seeking this extension of Special Authority. America Net is prepared to meet all other compliance requirements of the Commission and has registered for 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.

America Net further recognizes that application to the Commission pursuant to 46 C.F.R § 63.18 requires 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 required and has done so a pre-requisite to this Special Temporary Authority request.

In making its request for an extension of existing Special Temporary Authority, America Net acknowledges that its foreign ownership will require review and consultation by the Commission in conjunction 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. It is acknowledged that such review is not streamlined, and the Commission as well as Team Telecom may require time to review America Net's full Application for Section 214 Authority. This process may take several months to a year, and America Net does not wish to be

violation of the Act during this time period where it must provide services to meet market demand to the destination of Brazil and support the U.S. carrier and consumer demand to that destination. Therefore to meet this special increased market demand to the destination of Brazil during the summer months and avoid any possibility of violation of the Act, America Net hereby submits this Request for an Extension of Special Temporary Authority.

### **IMPACT STATEMENT**

The grant of this STA extension request will serve the public interest, convenience and necessity because such grant will permit America Net to provide regulated services to carriers and underlying consumer who will rely on America Net for their telecommunication needs thereafter. The grant of this STA will further ensure that America Net can continue to meet the needs of the telecommunication client carrier and underlying consumer alike, while its underlying application for authority is considered by the Commission.

Likewise, America Net is a small, new entrant provider to the telecommunications sector, and the permanent application does not raise any anti-competitive concerns. America Net acknowledges that the grant of this STA extension 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. America Net further acknowledges that grant of this STA may be revoked by the Commission upon its own motion without hearing. In the event America Net is denied authority or the STA is revoked by the Commission without grant of final authority, tentative emergency and limited Arrangement(s) have been made with other carriers to temporarily sustain Service(s) for a very limited period - as a contingency of last resort.

### **CONCLUSION**

For the above reasons, America Net Communication LLC respectfully requests that the Commission grant it an extension of special temporary authority to provide international telecommunications services in the areas described in this STA Extension Application until such time as the Commission acts upon America Net's Formal Application for permanent Authority pursuant to 47 U.S.C. § 214, as amended or alternatively until March 30, 2015 that may be extended by further STA Application as needed.

Respectfully Submitted,

America Net Communication LLC

By : /s/ Lincoln Oliveira da Silva /s/

Mr. Lincoln Oliveira da Silva, Owner

By and through its attorney for this application:

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**Please Direct STA Petition Correspondence to above Regulatory Counsel.**