

November 26, 2015

VIA IBFS

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: International Telcom, Ltd. Request for Special Temporary Authority

Dear Ms. Dortch:

International Telcom, Ltd. ("ITL,") and SwiftReach Networks, Inc. ("SNI," or "Transferee") (collectively, the "Applicants"), through undersigned counsel and pursuant to Section 214 of the Communications Act, as amended, 47 U.S.C. § 214, and Section 63.24 of the Commission's Rules, 47 C.F.R. § 63.24, respectfully request Special Temporary Authority ("STA") for transfer of control of the domestic and international Section 214 authorization of ITL, a non-dominant international service provider. Applicants respectfully request that the Commission grant this STA request as soon as possible to permit continued operations by ITL.

Pursuant to a Stock Purchase Agreement between/among SNI and ITL, dated as of November 25, 2015 (the "Agreement"), SNI will acquire all of the issued and outstanding stock in ITL. As a result, direct ownership and control of ITL will be transferred from Yvette Melendez to SNI, and ultimate ownership and control of ITL will be transferred to Afognak Holdings, Inc.

Because of the integrated financing and other arrangements the Applicants entered into in anticipation of this transaction and for other business and tax reasons, it is critical that the parties close on or about December 31, 2015. The Applicants filed domestic and international Section 214 Transfer of Control applications on November 26, 2015 ("Section 214 Applications") – as soon as practicable following the execution of the Stock Purchase Agreement. Additionally, while the Applicants anticipate streamlined processing for the Section 214 Applications, they anticipate that the applications will likely not be approved until sometime after January 1, 2016. Therefore, out of an abundance of caution, Applicants submit this STA request to permit the continued operations of ITL.

Grant of the requested STA will serve the public interest. A grant will permit the continued, uninterrupted service to customers while the Commission reviews the underlying applications. It will also promote competition in the communications services marketplace. Applicants note that they are not aware of specific harms to customers or to the market that may occur as a result of the grant of the STA. Rather, the transaction will have a positive impact on ITL's operations and its ability to provide cutting edge, competitive, cost-effective services to customers. Applicants

respectfully request the Commission to consider that the Applicants have acted in good faith in filing an application for approval of the transaction prior to closing.

The Applicants request thirty (30) days special temporary authority while the Section 214 Applications are pending. The Applicants acknowledge that the grant of this STA will not prejudice any action the Commission may take on the Section 214 Applications, and that once granted, the STA may be revoked on the Commission's own notice, without a hearing.

This filing and the applicable credit card payment in the amount of \$1,130.00 which satisfies the filing fee required under the Commission's Rules, are being submitted electronically through the IBFS. Please contact the undersigned at (703) 714-1319 if you have any questions, or require additional information.

Respectfully submitted,



Michael P. Donahue

Counsel for International Telecom, Ltd.