

Riva FZC

Application for Special Temporary Authority

Response to question 10: Provide Justification of Need for Special Temporary Authority

An original application was submitted as a result of an unauthorized transaction. A request was made to Riva's previous regulatory vendor at that time to file a petition for Special Temporary Authority. The request was then sent to another attorney to handle. Neither party addressed the request. As a result we hired a new regulatory contact who has been working to get this resolved with FCC personnel.

The applicant should be approved for special temporary authority as it is in the public's interest to avoid a discontinuance of service to customers while the Commission considers underlying application.

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.

Riva FZC has taken the necessary steps to ensure future compliance with Commission rules and regulations and has hired Compliance Solutions, Inc. as their regulatory vendor. The companies are working closely together to identify regulatory requirements so they can proactively be addressed.

We request Special Temporary Authority for 180 days.

Response to question 16: Respond to Paragraphs (d), (e)(3) and g of Section 63.18

Section 63.18 (d)

The applicant has previously received international authority under Section 214 of the Act. Their license number is ITC-20140128-00033.

Section 63.18 (e)(3)

Not Applicable. Applicant is applying for authority to operate as a global resale carrier pursuant to the terms and conditions of Section 63.18 (e)(2) of the Commission's Rules, 47 C.F.R 63.18 (e)(2)

Section 63.18 (g)

Not Applicable. Applicant is applying for authority to operate as a global resale carrier pursuant to the terms and conditions of Section 63.18 (e)(2) of the Commission's Rules, 47 CF.R 63.18 (e)(2)