

Date: 25 March 2019

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON DC 20554

**In the Matter of Flock FZ-LLC previously known as Riva FZC**

**RE: Application for special temporary authority for Transfer of Control application "ITC-T/C-INTR2019-00783" dated 19 March 2019**

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

Since Flock FZ-LLC ("Flock" or "Applicant") did not inform the Commission or seek prior approval before consummating the transaction of Transfer of Control dated 30 January 2018, the application was submitted as a result of unauthorized transaction.

Flock's earlier transfer of control application "ITC-T/C-20160316-00123" dated 16 March 2016 was pending with Team Telecom for its review, Flock was awaiting updates on this application, so it did not file the subsequent transfer of control application dated 30 January 2018, this transfer happened during the intermediate period. The transfer of control has happened between two UBO's who are real brothers and Co-founders of the business.

After discussion and as advised by the Commission, Flock has submitted transfer of control of international section 214 authorization application as on 19 March 2019.

Flock hereby requests the Commission to grant Special Temporary Authority as it is in the public 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.

Flock has taken the necessary steps to ensure future compliance with Commission rules and regulations. Flock will identify regulatory requirements on regular intervals, so Flock can address them proactively.

Flock hereby 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 Flock has previously received international authority under Section 214 of the Act. Its 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)

Thanking you in anticipation.

Your Faithfully,  
For Flock FZ-LLC



Brijesh Joshi  
Director