

January 25, 2021

Via IBFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
45 L Street, NE
Washington, DC 20554

**Re: Application for Special Temporary Authority (International)
Joint Domestic and International Application
Jim Chiu and Sean Lin, *Transferors*, Vertex Telecom, Inc., *Licensee*, and Dr. Peng
Holdings, Inc. *Transferee*
ITC-214-19980226-00152**

Dear Ms. Dortch:

Jim Chiu and Sean Lin, Vertex Telecom, Inc. (“Vertex”), and Dr. Peng Holdings, Inc. (“Dr. Peng”) (Mr. Chiu and Mr. Lin and, together with Vertex and Dr. Peng, the “Applicants”), hereby respectfully request Special Temporary Authority for Vertex to continue providing international telecommunications services notwithstanding the transfer of control of the domestic and international section 214 authorizations held by Vertex from Mr. Chiu and Mr. Lin to Dr. Peng as described below and in the Joint Domestic and International Application, as amended and supplemented (“Joint Application”), pending the Commission’s review of the above-referenced application for transfer of control.¹

On March 31, 2016, Mr. Chiu and Mr. Lin sold 100% of the equity of Vertex to Dr. Peng, a holding company and wholly-owned subsidiary of Dr. Peng Telecom & Media Group Co. Ltd., a publicly-traded, Chinese company.² Unfortunately, due to the size of the acquisition, no legal counsel were involved in the transfer and none of the parties were aware of the requirement to seek FCC approval prior to the transfer of control. As a result, the parties did not seek or receive FCC consent to the transfer of control.

On November 26, 2019, the Enforcement Bureau issued a Letter of Inquiry (“LOI”) regarding the transfer of control. On January 6, 2020, Vertex filed its response to the LOI. On January 14, 2021, Vertex

¹ Vertex holds an International 214 Authorization, ITC-214-19980226-00152 and a Domestic 214 Authorization by operation of rule.

² Vertex’s wholly-owned subsidiary, Vertex SSX Corporation was also included in the transaction. Vertex SSX Corporation never commenced the provision of any telecommunications services, never had any telecommunications customers, and does not currently provide telecommunications services to any customers pursuant to the Section 214 authorization. Concurrently with the filing of this Application for Special Temporary Authority, Vertex SSX Corporation has filed with the FCC to surrender its International Section 214 Authorization, ITC-214-20041117-00464. Because Vertex SSX Corporation never commenced services it never obtained Domestic Section 214 authority by operation of rule.

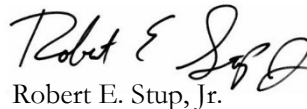
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belatedly filed the Joint Application, which is the first of two separate applications being filed as part of a Consent Decree to terminate the Enforcement Bureau's investigation. While the Joint Application seeks consent to transfer control of the domestic and international section 214 authorizations held by Vertex from Mr. Chiu and Mr. Lin to Dr. Peng, the "Second Application" seeks FCC consent to "unwind" the sale of Vertex to Dr. Peng by divesting all of Dr. Peng's interest and rights that it holds in Vertex and returning 100% ownership and control of Vertex back to Mr. Chiu, Vertex's founder.

Applicants acknowledge and regret that they did not seek the required consent from Commission for the transfer of control of Vertex to Dr. Peng before completing the transfer, and Applicants wish to correct their past failure and to return to compliance with the Commission's rules in this matter. Applicants further acknowledge that a grant of this request for Special Temporary Authority will not prejudice any action that the Commission may take in connection with the associated application for transfer of control, that any Special Temporary Authority granted may be revoked by the Commission on its own motion without a hearing, and that the granting of Special Temporary Authority and the associated Joint Application will not preclude enforcement action.

For the foregoing reasons, the Commission should grant the requested Special Temporary Authority for sixty (60) days to allow Vertex to continue to operate.

Respectfully Submitted,


Robert E. Stup, Jr.