

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

In the Matter of:)
)
Telecom Worldwide Solutions, Inc.)
)
And)
) File No. ITC-
)
)
)
Application for Special Temporary)
Authority to Offer International Services)
Pursuant to Section 214 of the)
Communications Act of 1934, as Amended)

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

Telecom Worldwide Solutions, Inc. (“TWSI”) by its attorneys, hereby requests 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 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”).

BACKGROUND

TWSI is New York corporation which provides prepaid international long distance calling cards to consumers domestically within the United States. TWSI is a small-sized business that operates with a staff of less than four (4) employees in the company. The company has been in existence since 2008 offering international long distance calling service since approximately September 15, 2009 as a prepaid Calling Card Company. TWSI’s management retained prior

counsel to procure Authority to provide International Services under 47 U.S.C. § 214, as amended, which was prepared electronically and paid under the Form 159 on August 8, 2009. Recently, the company later discovered that although payment was accepted by the Commission, the application was not placed as a system entry for regular processing under streamlined rules. Investigation prior to this application discovered that a separate FRN and application is on the Commission's electronic filing system but not connected to the first filing. The error appears to be in the way the application was entered by the company at the time. Review by this counsel leads to the conclusion that it was likely a submission error, but we cannot confirm exactly how or what error. A new Section 214 authority application has been prepared to remedy the error and bring the Company into compliance. In its second application, TWSI is attempting to apply the original past payment on August 8, 2009 paid to the Commission for the purposes of this STA.

Since TWSI was notified nothing to the contrary, the company began operations on September 15, 2009 under the impression that the Authority was already granted due to the normal timelines for a streamlined filing. TWSI desires to be in compliance with the Commission's rules as quickly as possible and reconcile on the Commission's records its two (2) FRN numbers in the process of this application. The filing error in this particular instance of TWSI, was not intentional disregard by TWSI of the Commission's rules or the Communications Act of 1934, as amended, but instead, a error due to the unfamiliarity with the International Bureau's IBSF system and procedures for electronic filing.

REQUEST FOR SPECIAL AUTHORITY

TWSI hereby request Special Temporary Authority to temporarily provide international telecommunications services 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 for any operation from time tolling since August 8, 2009 due to the unique and extra-ordinary nature of TWSI' circumstances. TWSI, as a prepaid calling card provider of international long distance and international services, 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.¹ TWSI recognizes that it is required to obtain Section 214 Authority prior to the rendering of International Telecommunication Services to the public. TWSI submits that it undertook affirmative efforts to be compliant with the Act and the Commission's Rules, but due to an error in filing the application was not properly submitted to the Commission and has remained in a "limbo" over a period of months. Due to the above stated extraordinary circumstances seeks this special authority to enable it to cure filing deficiencies that arose from August 8, 2009 and thereafter.

TWSI also recognizes that it must now make formal application to the Commission as 46 C.F.R § 63.18 require that "any party seeking authority pursuant to Section 214 ... for the provision of common carrier communications services between the United States, its territories

¹ 47 U.S.C. § 214(a).

or possessions, and a foreign point shall request such authority by formal application.”² In making such a formal application, TWSI recognizes that based upon no foreign ownership in the and non-dominant status the review process should be streamlined and not extended over any extra ordinary review period with the Executive Branch. To avoid any possibility of continued violation of the Act, TWSI hereby submits this STA Application to cover any period during the Commission’s approval process and period since August 8, 2009.

CONCLUSION

For these reasons, TWSI respectfully requests that the Commission grant it special temporary authority to provide international telecommunications services in the areas described in the STA Application until such time as the Commission acts upon TWSI Telecom’s Formal Application for permanent Authority pursuant to 47 U.S.C. § 214, as amended and for the period tolling since August 8, 2009.

Respectfully Submitted,

Telecom Worldwide Solutions, Inc.

By : /s/ Ezequiel Villasenor /s/

Mr. Ezequiel Villasenor, CEO/President

Please Direct STA Petition Correspondence to:

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March 25, 2010

² 47 C.F.R. § 63.18.

REQUEST FOR SPECIAL TEMPORARY AUTHORITY
Verification by Corporate Officer

I, Ezequiel Villasenor, CEO/President and owner of Telecom Worldwide Solutions, Inc., a New York Corporation, hereby certify the following:

1. I have read the foregoing Request for Special Temporary Authority, and, to the best of my knowledge, all of the states therein are true and correct; and
2. No party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

I declare under the penalty of perjury that the foregoing is true and correct

Respectfully Submitted,

Telecom Worldwide Solutions, Inc.

By : /s/ Ezequiel Villasenor /s/

Mr. Ezequiel Villasenor, CEO/President