

ATTACHMENT 1

Application Of TWare Connect LLC To Extend Special Temporary Authority To Provide International Resold Services

Pursuant to Section 63.25 of the Commission's rules,¹ TWare Connect LLC ("TWare")² requests that the Commission extend for 30 days its existing special temporary authority ("STA") to provide international telecommunications services on a resale basis between the United States and all international points. The STA previously granted by the Commission will expire on June 9, 2014.³ Accordingly, TWare requests that the STA be extended until July 9, 2014.

Answer to Question 10 (Justification of Need for Extension of STA)

The Commission has before it an application that seeks Commission approval for TWare to provide international resold services on a resale basis between the United States and all international points.⁴ TWare sought Section 214 authority to operate as a Mobile Virtual Network Operator ("MVNO") in the United States to serve a niche group of enterprise companies that were required to comply with a new federal regulatory obligation by December 13, 2013 to record and retain certain calls. As TWare anticipated in the STA Application, however, its Section 214 Application has been subject to review by the Department of Justice, the Department of Homeland Security, the Department of Defense, and the Federal Bureau of Investigation ("Team Telecom") for national security concerns. TWare therefore sought the STA to help enable timely compliance with the new federal rules.

TWare has been in on-going discussions with Team Telecom to address any concerns it might have. Those discussions are progressing well, and TWare anticipates that the Team Telecom review process will conclude within the next month. Extending the STA would allow TWare to retain its operating authority to provide international telecommunications services while Team Telecom and the Commission complete their review of the Section 214 Application.

TWare acknowledges that the grant of this STA extension request will not prejudice any action the Commission may take on the underlying Section 214 Application. TWare further

¹ 47 C.F.R. § 63.25.

² TWare changed its name from Mobile Financial Services, LLC to TWare on December 19, 2013. The Commission was notified of the name change on January 10, 2014. *See* Letter from Adam D. Krinsky, Counsel to TWare, to Marlene H. Dortch, Secretary, FCC, File Nos. ITC-214-20130827-00232; ITC-STA-20130827-00233 (Jan. 10, 2014).

³ Application Of Mobile Financial Services, LLC For Special Temporary Authority To Provide International Resold Services, File No. ITC-STA-20130827-00233 (filed Aug. 27, 2013; supplemented Nov. 11, 2013; granted Dec. 11, 2013) (the "STA Application").

⁴ Application Of Mobile Financial Services, LLC For Section 214 Authority To Provide International Resold Services, File No. ITC-214-20130827-00232 (filed Aug. 27, 2013) (the "Section 214 Application").

acknowledges that the STA can be revoked by the Commission upon its own motion without a hearing.

Answer to Question 16 (Responses to 47 C.F.R. §§ 63.18(d), (e)(3) and (g))

- (d) With the exception of the STA, TWare has not previously received authority under Section 214 of the Communications Act.
- (e)(3) Because TWare does not seek authority to acquire facilities or to provide services that are not covered by Sections 63.18(e)(1) and 63.18(e)(2) of the Commission's rules, subsection (e)(3) is not applicable.
- (g) Because TWare does not seek facilities-based authority under Section 63.18(e)(3) of the Commission's rules, subsection (g) is not applicable.