

**Joann Ekblad**

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**From:** Myla Saldivar-Trotter [msaldiva@leo.gov]  
**Sent:** Thursday, February 23, 2006 4:05 PM  
**To:** David Krech; George Li; Joann Ekblad; Susan OConnell  
**Subject:** WaveCrest Communications LLC

Hi George, Joann, David, and Susan,

Please be advised that the DHS, with the concurrence of the DOJ and the FBI, has no objection on grounds of national security, law enforcement, or public safety to the applicant's, WaveCrest Communications LLC, request for Special Temporary Authority (ITC-STA-20060130-00077) for no longer than 180 days to continue providing international telecommunications service while the Commission completes its review of the applicant's application for transfer of control (ITC-T/C-20060130-00076).

Please also be advised that the DHS, DOJ, and FBI request that the following application be REMOVED from streamline:

1. WaveCrest Communications, LLC - ITC-T/C-20060130-00076

Please let me know if you have any questions.

Thank you,

Myla Saldivar-Trotter

FBI

2/23/2006

**Mikelle Morra**

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**From:** Myla Saldivar-Trotter [msaldiva@leo.gov]  
**Sent:** Friday, April 21, 2006 4:21 PM  
**To:** David Krech; George Li; Joann Ekblad; Mikelle Morra; Susan OConnell  
**Subject:** Wavecrest

Hello George, Joann, Susan , David, and Mikelle,

Please be advised that based upon information in their FCC application and discussions with the company, the FBI, DHS, and DOJ have no comments regarding the following application:

1. Wavecrest Communications LLC - **ITC-T/C-20060130-00076**; ITC-STA-20060130-00077.

Please let me know if you have any questions. Have a good weekend.

Thanks,  
Myla Saldivar-Trotter  
FBI

4/26/2006



Federal Communications Commission  
Washington, D.C. 20554

International Bureau

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(202) 418-1462

(202) 418-2824 (fax)

February 2, 2006

Ref: 2006-10

Hillary Morgan	(703) 607-6092	Monique Roth	(202) 353-6200
Steven W. Lett	(202) 647-5835	Regina Hart	(202) 205-0497
Eric Werner	(202) 772-0908	Louis Brenner	(202) 692-4235
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Helen Domenici	(202) 456-6085	Kenneth Schagrin	(202) 395-5663
Dominic Pastore	(202) 514-5607	Myla S. Trotter	(202) 324-1730
Laura Parsky	(202) 616-3928		

Re: WaveCrest Communications LLC Transfer of Control  
ITC-T/C-20060130-00076 (e-file)  
ITC-STA-20060130-00077 (e-file)

Dear Sir or Madam:

On January 30, 2006, WaveCrest Communications LLC (WaveCrest) filed an application, ITC-**T/C-20060130-00076**, for Commission approval of an unauthorized transfer of control on an **international** section 214 authorization that took place in 2002, and a request for Special Temporary Authority (STA), ITC-STA-20060130-00077, to continue to provide service while the Commission considers the underlying transfer of control application.

According to the Transfer Application, in two separate transactions in 2002 Marr T&T (then known as Nalar Finance Limited) acquired a 38.98 percent ownership interest in the parent of WaveCrest, and then acquired a 63.99 percent interest and control of the parent, and thus control of WaveCrest. Currently, after a series of pro forma transactions and name changes, WaveCrest is a wholly-owned subsidiary of WaveCrest (UK) Limited, a **United Kingdom** corporation, which is a wholly-owned subsidiary of WaveCrest Group Enterprises, a corporation organized under the laws of the **British Virgin Islands**. Mar T&T, a **British Virgin Islands** company, indirectly controls WaveCrest through its majority interest in WaveCrest Group Enterprises Limited. The sole shareholder of Marr T&T is Marr Group Holdings Limited, a company incorporated under the laws of **Mauritius**. Mr. Marat Safin, a citizen of the **United Kingdom**, is the sole shareholder of Marr Group Holdings Inc.

**Please advise us on or before February 23, 2006**, whether you have any national security, law enforcement, foreign policy or trade concerns with WaveCrest's STA request and the underlying transfer of control application.

Sincerely,

George Li, Deputy Chief  
Policy Division

**RECEIVED**

MAR 14 2006

Policy Division  
International Bureau

**SQUIRE, SANDERS & DEMPSEY L.L.P.**  
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Washington, D.C. 20044-0407  
Office: +1.202.626.6600  
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fletcher@ssd.com

March 2, 2006

**RECEIVED**

MAR - 2 2006

Federal Communications Commission  
Office of Secretary

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
c/o Natek, Inc.  
236 Massachusetts Avenue, N.E.  
Suite 110  
Washington, DC 20002

Re: Application for Consent to Transfer of Control of WaveCrest Communications, LLC  
File No.: **HTC-T/C-20060130-00076**

Dear Ms. Dortch:

Transmitted herewith, on behalf of WaveCrest Communications, LLC, are an original and 4 copies of an amendment to its above-referenced application requesting Commission consent to a transfer of control of WaveCrest Communications, LLC.

An extra copy of the amendment is enclosed to be stamped by you as received for return to this office.

Please contact the undersigned if there are any questions.

Sincerely,

SQUIRE, SANDERS & DEMPSEY L.L.P.



Francis E. Fletcher

Encl:

cc: Roy Schiele

AMENDMENT TO TRANSFER OF CONTROL APPLICATION  
FILE NO. ITC-T/C-20060130-00076

Stamorth Limited and Marr T&T Limited ("Marr T&T") the proposed Transferor and Transferee, respectively, in the pending application (ITC-T/C-20060130-00076) requesting Commission consent to the transfer of control of WaveCrest Communications LLC ("WaveCrest"), the holder of International 214 Authorization ITC-214-20020214-00056, hereby amend that application as follows:

Equity Ownership of WaveCrest Group Enterprises Limited. As stated in the application, WaveCrest is a limited liability company organized under the laws of Delaware. It is the wholly-owned U.S. subsidiary of WaveCrest (UK) Limited, a UK corporation, which in turn is wholly-owned by WaveCrest Group Enterprises Limited, a corporation organized under the laws of the British Virgin Islands. The current ownership of WaveCrest Group Enterprises Limited is shown in the following table:

Marr T&T Limited Akara Building 24 De Castro Street Wickhams Cay 1 Road Town, Tortola British Virgin Islands Registration: British Virgin Islands	77.35%
Golden Mist Limited 2nd Floor, Barkly Wharf, Le Chaudan Waterfront, Port Louis, Mauritius Registration: Mauritius	2.80%
Mr. Marat Safin 46 Clapham Common North Side London SW4 0AA Citizenship: UK	0.87%
Phillip Anderson 5528 Pimlico Drive, Tallahassee, Florida 32309, USA Citizenship: USA	14.74%
Stamorth Limited 82 St. John Street London EC1M 4JN United Kingdom Registration: United Kingdom	4.24%

AMENDMENT TO  
FILE NO. TTC-T/C-20060130-00076

Equity Ownership of Marr Group Holdings Limited. As stated in the application, the sole shareholder of Marr T&T, the proposed Transferee, is Marr Group Holdings Limited. Mr. Marat Safin, a director of Marr T&T whose address and citizenship information are provided in the application, controls Marr T&T through his control of its sole shareholder, Marr Group Holdings Limited. Mr. Marat Safin holds 100% of the equity of Marr Group Holdings Limited.

STARNORTH LIMITED  
(Transferor)



Roger I. Gale  
Director

Dated: 23/02/06

MARR T&T LIMITED  
(Transferee)

Andrew D. Brown  
General Counsel

Dated: \_\_\_\_\_

AMENDMENT TO  
FILE NO. ITC-T/C-20060130-00076


Equity Ownership of Marr Group Holdings Limited. As stated in the application, the sole shareholder of Marr T&T, the proposed Transferee, is Marr Group Holdings Limited. Mr. Marat Safin, a director of Marr T&T whose address and citizenship information are provided in the application, controls Marr T&T through his control of its sole shareholder, Marr Group Holdings Limited. Mr. Marat Safin holds 100% of the equity of Marr Group Holdings Limited.

STARNORTH LIMITED  
(Transferor)

\_\_\_\_\_  
Roger I. Gale  
Director

Dated: \_\_\_\_\_

MARR T&T LIMITED  
(Transferee)

  
\_\_\_\_\_  
Andrew D. Brown  
General Counsel

Dated: 24/2/06