

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Impsat Fiber Networks, Inc.,)	
<i>Transferor,</i>)	ITC-T/C-20061128-00533
)	SCL-T/C-20061128-00011
and)	SES-T/C-20061128-02052
)	
Global Crossing Limited,)	WC Docket No. 06-215
<i>Transferee,</i>)	
)	
Application for Consent Pursuant to Section)	
214 of the Communications Act of 1934, as)	
Amended, to Transfer Control of Impsat Fiber)	
Networks, Inc.'s Authorized U.S. International)	
and Domestic Carrier Subsidiary, Impsat USA,)	
Inc., to Global Crossing Limited)	

**PETITION TO ADOPT CONDITIONS TO
AUTHORIZATIONS AND LICENSES**

The United States Department of Justice (“DOJ”), including the Federal Bureau of Investigation (“FBI”), together with the United States Department of Homeland Security (“DHS”) (collectively, the “Agencies”), respectfully submit this Petition to Adopt Conditions to Authorizations and Licenses (“Petition”), pursuant to Section 1.41 of the Federal Communications Commission’s (“FCC” or “Commission”) rules.¹ Through this Petition, the Agencies advise the Commission that they have no objection to the Commission granting its consent in the above-referenced proceeding, provided that the Commission conditions the grant on Global Crossing Limited (“GCL”) abiding by the commitments and undertakings contained in the attached Amendment 1 to the Network Security Agreement (the “Agreement”) entered into

¹ 47 C.F.R. § 1.41.

between GCL, Singapore Technologies Telemedia Pte Ltd, and the Agencies on September 24, 2003.

In the above-captioned proceedings, GCL and Impsat Fiber Networks, Inc. (“Impsat”) propose to transfer control of Impsat’s wholly owned U.S.-based subsidiary, Impsat USA, Inc. (“Impsat USA”), from Impsat to GCL. GCL and Impsat have filed applications with the FCC, pursuant to Section 214 and relevant FCC rules, seeking consent for the transfer of control of Impsat USA to GCL.²

As the Commission is aware, the Agencies have taken the position that their ability to satisfy their obligations to protect the national security, enforce the laws, and preserve the safety of the public could be impaired by transactions in which foreign entities will own or operate a part of the U.S. telecommunications system, or in which foreign-located facilities will be used to provide domestic telecommunications services to U.S. customers. After discussions with representatives of GCL and Impsat, the Agencies have concluded that the commitments set forth in the Agreement will help ensure that the Agencies and other entities with responsibility for enforcing the law, protecting the national security, and preserving public safety can proceed in a legal, secure, and confidential manner to satisfy these responsibilities. Accordingly, the Agencies hereby advise the Commission that they have no objection to the Commission granting the above-referenced Applications, provided that the Commission conditions its consent on

² See *Domestic Section 214 Application Filed for the Transfer of Control of Impsat USA, Inc. from Impsat Fiber Networks, Inc. to Global Crossing Limited*, Public Notice, DA 06-2460, WC Docket No. 06-215 (rel. Dec. 5, 2006); *Streamlined International Applications Accepted for Filing*, Public Notice, Report No. TEL-01097S, File No. ITC-T/C-20061128-00533, at 2 (rel. Dec. 15, 2006); *Communications Services Re: Satellite Radio Applications Accepted for Filing*, Public Notice, Report No. SES-00878, File No. File No. SES-T/C-20061128-02052, at 10 (rel. Dec. 6, 2006); *Streamlined Submarine Cable Landing License Applications Accepted for Filing*, Public Notice, Report No. SCL-00021S, File No. SCL-T/C-20061128-00011, at 2 (rel. Dec. 15, 2006).

compliance by GCL with the commitments set forth in the Agreement as amended by the Amendment to the Agreement.

The Agencies are further authorized to state that GCL and Impsat do not object to the grant of this Petition.

Respectfully submitted,



Charles Steele
Chief of Staff
Office of the Assistant Attorney General
National Security Division
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530
(202) 514-1057

Elaine N. Lammert
Deputy General Counsel
Federal Bureau of Investigation
923 Pennsylvania Avenue, N.W.
Washington, DC 20532
(202) 324-1530

Stewart A. Baker
Assistant Secretary for Policy
United States Department of Homeland Security
3801 Nebraska Avenue, N.W.
Washington, D.C. 20528
(202) 282-9708

CARL WAYNE SMITH
General Counsel
Defense Information Systems Agency
Post Office Box Number 4502
Arlington, VA 22204-4502
(703) 607-6091

January 31, 2007

the above-referenced Applications, provided that the Commission conditions its consent on compliance by GCL with the commitments set forth in the Amendment to the Agreement.

The Agencies are further authorized to state that GCL and Impsat do not object to the grant of this Petition.

Respectfully submitted,

Kenneth L. Wainstein
Deputy Assistant Attorney General
Office of the Assistant Attorney General
National Security Division
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530
(202) 305-8319

Elaine N. Lammert
Deputy General Counsel
Federal Bureau of Investigation
923 Pennsylvania Avenue, N.W.
Washington, DC 20532
(202) 324-1530



Stewart A. Baker
Assistant Secretary for Policy
United States Department of Homeland Security
3801 Nebraska Avenue, N.W.
Washington, D.C. 20528
(202) 282-9708

DOD Signatory

January [], 2007

compliance by GCL with the commitments set forth in the Agreement as amended by the Amendment to the Agreement.

The Agencies are further authorized to state that GCL and Impsat do not object to the grant of this Petition.

Respectfully submitted,

Charles Steele
Chief of Staff
Office of the Assistant Attorney General
National Security Division
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530
(202) 514-1057

/s/ ELAINE N. LAMMERT
Elaine N. Lammert
Deputy General Counsel
Federal Bureau of Investigation
923 Pennsylvania Avenue, N.W.
Washington, DC 20532
(202) 324-1530

Stewart A. Baker
Assistant Secretary for Policy
United States Department of Homeland Security
3801 Nebraska Avenue, N.W.
Washington, D.C. 20528
(202) 282-9708

Carl Wayne Smith
General Counsel
Defense Information Systems Agency
Post Office Box Number 4502
Arlington, VA 22204-4502
(703) 607-6091

January 31, 2007

compliance by GCL with the commitments set forth in the Agreement as amended by the Amendment to the Agreement.

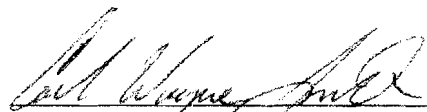
The Agencies are further authorized to state that GCL and Impsat do not object to the grant of this Petition.

Respectfully submitted,

Charles Steele
Chief of Staff
Office of the Assistant Attorney General
National Security Division
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530
(202) 514-1057

Elaine N. Lammert
Deputy General Counsel
Federal Bureau of Investigation
923 Pennsylvania Avenue, N.W.
Washington, DC 20532
(202) 324-1530

Stewart A. Baker
Assistant Secretary for Policy
United States Department of Homeland Security
3801 Nebraska Avenue, N.W.
Washington, D.C. 20528
(202) 282-9708



CARL WAYNE SMITH
General Counsel
Defense Information Systems Agency
Post Office Box Number 4502
Arlington, VA 22204-4502
(703) 607-6091

February 1, 2007