

Proceeding: Application filed for the Nunc Pro Tunc approval of a transfer of control of Star
Applicant Name: DHS/DOJ/FBI
Proceeding Name: 07-115 Author Name: 5514762987
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July 25, 2007

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Mr. Stewart A. Baker
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Ms. Elaine N. Lammert
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Federal Bureau of Investigation
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Re: Pending application by StarVox Communications, Inc. for authority to transfer control of StarVox Communications, Inc. and Capital Telecommunications, Inc., holders of domestic and international authorization under Section 214 of the Communications Act of 1934, to U.S. Wireless Data, Inc.

Ladies and Gentlemen:

This letter outlines the commitments made by U.S. Wireless Data, Inc., its direct, wholly owned subsidiary, StarVox Communications, Inc. ("StarVox"), and its indirect, wholly owned subsidiary, Capital Telecommunications, Inc. ("Capital") (collectively "the Companies") to the U.S. Department of Justice ("DOJ"), including the Federal Bureau of Investigation ("FBI"), and to the U.S. Department of Homeland Security ("DHS"), in order to address national security, law enforcement, and public safety concerns raised with regard to the Companies' application to the Federal Communications Commission ("FCC") to transfer control of an authorization to provide international facilities-based and resold services to all international points under Section 214 of the Communications Act of 1934, as amended.

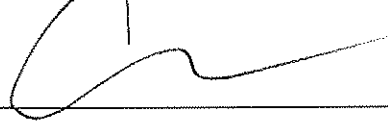
In a letter agreement dated September 14, 2006 (the "Letter Agreement"), StarVox and Capital provided DOJ, DBI, and DHS with a number of assurances related to a prior application to transfer control, [FCC-IB File Number(s)]. By this new letter, the Companies hereby commit that they will abide by all of the commitments made in the Letter Agreement.

The Companies understand that, upon execution of this letter by an authorized representative or attorney for the Companies, the DOJ, FBI, and DHS shall notify the FCC that the DOJ, FBI, and DHS have no objection to the FCC's grant of the Companies' application filed with the FCC.

The Companies agree that, in the event the commitments set forth in this letter are breached, in addition to any other remedy available at law or equity, the DOJ, FBI or DHS may request that the FCC modify, condition, revoke, cancel, or render null and void any relevant license, permit, or other authorization granted by the FCC to the Companies or any successor-in-interest to the Companies.

Sincerely,

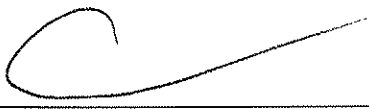
U.S. Wireless Data, Inc.



Starvox Communications, Inc.



Capital Telecommunications, Inc.



In the above-captioned proceedings, the Companies have petitioned the Commission for consent to transfer control of an authorization under Section 214 of the Communications Act of 1934, as amended, currently held by StarVox, to USWI.

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 the Companies in connection with the proposed request, the Agencies have concluded that the commitments set forth in the Letter 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 petition provided that the Commission conditions its consent on compliance by the Companies with the commitments set forth in the Letter.

The Agencies are authorized to state that the Applicants do not object to the grant of this Petition.

Respectfully submitted,

/s/ Sigal P. Mandelker
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August 10, 2007