

Federal Communications Commission Washington, D.C. 20554

International Bureau

E-mail: James.Ball@fcc.gov George.Li@fcc.gov

Ref: 2008-29 June 27, 2008 (202) 418-2824 (fax) (202) 418-1462

(703) 607-6092 (202) 282-8973 (202) 395-5663 (202) 305-4218 (202) 482-5461 Sally Shipman Jon D. Pifer Edward T. Hand Alex Daman Steven W. Lett (202) 647-5835 (202) 282-9940 (202) 514-2464 (202) 456-6085 (202) 324-8124

Stephen Heifetz Hillary Morgan

Re: Vanco/FLAG

John Connors Kenneth Schagrin Josephine Arnold

ITC-T/C-20080527-00241 WC Docket No. 08-79 ITC-T/C-20080527-00239

Reply Comments Due: July 18, 2008 Comments Due: July 11, 2008

Dear Sir or Madam:

international section 214 authorizations. Pursuant to the terms of the proposed transaction, Vanco On May 28, 2008, Vanco Solutions, Inc. (Vanco Solutions), Vanco US LLC (Vanco US, and together with Vanco Solutions, Vanco), Vanco plc (Vanco plc), and FLAG Telecom Group will be 100% owned by FLAG, which will be 100% owned by Reliance entities. Two citizens of applications to transfer control of Vanco from Vanco plc to FLAG. Vanco holds domestic and Services Limited (FLAG and, together with Vanco and Vanco plc, the Applicants) filed India own majority of Reliance entities.

27, 2008 2:42p.m. to transfer the control of Vanco from Vanco plc to FLAG per Joanne Ongman's e-mail of May Please not that on May 27, 2008, we granted the request for Special Temporary Authority

section of the Public Notice for WC Docket No. 08-79, DA 08-1524 (rel. June 27, 2008). transaction, please file your comments by July 11, 2008. Please see the General Information any national security, law enforcement, foreign policy or trade concerns with this proposed A copy of Public Notice DA 08-1524 (rel. June 27, 2008) is attached. Should you have

For further information, please contact Tracey Wilson-Parker, at (202) 418-1394, or Dennis Johnson at (202) 418-0809, or David Krech at (202) 418-7443.

Sincerely,

George Li, Deputy Chief

Policy Division

George Li

From: Veronica Garcia-Ulloa

Sent: Friday, June 27, 2008 3:09 PM

<u>.</u>

'dklein1@leo.gov'; 'edward.hand@usdoj.gov'; 'hillary.Morgan@disa.mil'; 'jarnold@ntia.doc.gov'; 'kschagrin@ustr.gov'; 'vbarrish@askcalea.net'; 'maydc@state.gov'; 'lettsw@state.gov'; 'alane.kochems@associates.HQ.DHS.GOV'; 'Stephen.heifetz@dhs.gov'; 'Christopher.Siefken@ic.fbi.gov'; 'sshipman@ostp.eop.gov'; 'Erica.Bomsey@dhs.gov'; 'shannon.culbertson@associates.dhs.gov'; 'margaret.Dudek@dhs.gov'; 'Brandt.Pasco@dhs.gov'; 'CarrollD@state.gov'; 'Williams, Brian <CTR>'; 'Pifer, Jon (LEO)'; 'Pinto, Greg (DHS)'; 'Daman, Alex'; 'Daniels, Douglas'; 'Connors, John'; 'TTelecom'; 'Thomas Doyle'; 'Ongman, Joanne'; 'Rockoff, Jennifer'; 'Siobhan.Dupuy@usdoj.gov'

James Ball; Francis Gutierrez; Howard Griboff; George Li; Susan OConnell; David Krech; Joann Ekblad; Mikelle Morra; Veronica Garcia-Ulloa; Janeese Parker; Jodie May; Tracey Wilson-Parker; Dennis Johnson

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Subject: Cover Letter Reference 2008-29 (Comments due July 11, 2008) and PN DA 08-1524 in a

Word document.

Attachments: Executive Branch 2008-29.doc; PN DA 08-1524.doc

Good Afternoon,

document. Attached is Cover Letter Reference 2008-29 (Comments due July 11, 2008) and PN DA 08-1524 in a Word

Thank you,

International Bureau/Policy Division (202) 418-0481 Federal Communications Commission Veronica.Garcia-Ulloa@fcc.gov Veronica Garcia-Ulloa

Request for Further Extension of Special Temporary Authority ATTACHMENT 1

respectively. granted on May 27, 2008, and was subsequently extended until August 25, 2008 and September review of the Applications for the reasons set forth in the request for such STA. The STA was File No. ITC-STA-20080527-00240 to transfer control of Vanco to FLAG pending full FCC 63.01(a) of the Commission's rules. Simultaneously with the filing of the Applications, the authority to provide domestic interstate services under Section 214 of the Act and Section (File Nos. ITC-214-20070703-00260 and ITC-214-20070703-00262, respectively) and blanket FLAG of Vanco, which holds international Section 214 authorizations from the Commission filed applications (the "Applications") seeking the Commission's consent to transfer control to 24, 2008 with respect to IBFS File No. ITC-STA-20080527-00240 and WC Docket No. 08-79, Applicants requested special temporary authority ("STA") in WC Docket No. 08-79 and IBFS Inc. and Vanco US, LLC (together, On May 27, 2008, FLAG Telecom Group Services Limited ("FLAG"), Vanco Solutions "Vanco," and collectively with FLAG, the "Applicants"

review may be completed. Team Telecom has advised the applicants that they do not object to review prior to August 25, 2008. referred to as "Team Telecom") that are reviewing the Applications will not complete their an extension of the STA. No. 08-79 and extended for a period of 30 days, i.e., until September 24, 2008, so that such IBFS File No. ITC-STA-20080527-00240 be made coterminous with the STA in WC Docket The Applicants have been informed that the Executive Branch agencies (collectively The Applicants therefore respectfully request that the STA in

Non-Streamlined ITC-STA-20080811-00376 IB2008001942

FLAG Telecom Group Services Limited

12: TTC-1/2-2008 0527 - 00239 40024

Granted 25 2008

Policy Division international Bureau date:

Expire: Sept. 24, 2008

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Chief, Felicy Div. IS

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Policy Division

C. Dave Sumita

FAX SHEET

Fax Number: (202) 418-2824

Extensi	SPECIAL INSTRUCTIONS: YO	TELEPHONE NUMBER:	FAX NUMBER:	<i>TO</i> :	TELEPHONE NUMBER: (202) 418-1462	FROM: Excerse	DATE:
Extension \$ Tre-SEA-20-80527-00 240)	SPECIAL INSTRUCTIONS: MC- STA- 20080811-00376 (Vanco /FLAG	8641-155	(202) 55 1-0198	J. Steven Rich 518.	2) 418-1462	Dorgo Li	8/25/08

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Paul *Hastings*

Paul, Hastings, Janofsky & Walker LLP 875 15th Street, N.W. • Washington, DC 20005 telephone 202 551 1700 • facsimile 202 551 1705 • www.paulhastings.com

Non-Streamlined ITC-STA-20080527-00240

FLAG Telecom Group Services Limited IB2008001249

Re: III-1/2-20080527-00239 J 224/

taragiunta@paulhastings.com (202) 551-1791

Beijing Allanta

May 27, 2008

VIA HAND DELIVERY

New York Orange County Palo Alto

London Hong Kong Chicago Frankfurt

os Angeles

Suite 110 236 Massachusetts Avenue, N.E. Washington, D.C. 20002 Federal Communications Commission Marlene H. Dortch

Shanghai San Francisco San Diego

Washington, DC

Re: FLAG Telecom Group Services, Inc. Request for Special Temporary Authorization

Granted 27 2008

July 26, International Bureau Policy Division 2008

authorized by: Chref, Policy Div.

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pplicant and thous P. 2 ature of the acknowledges ATZ application the

Dear Sir or Madam:

hold international Section 214 authorizations from the Commission (File Nos. ITC-214-20070703-00260 and ITC-214-20070703-00262, respectively) and blanket authority to simultaneously filing applications seeking the Commission's consent to transfer control to Section 214 of the Act and Section 63.01(a) of the Commission's rules. FLAG is provide domestic interstate services under Section 214 of the Act and Section 63.01(a) of FLAG of Vanco Solutions, Inc. and Vanco US, LLC (collectively, "Vanco"), which also 2003.1104-00505) and blanket authority to provide domestic interstate services under international Section 214 authorization from the Commission (File No. ITC-214the Commission's rules. Globalcom Services, Inc. (formerly Yipes Enterprise Services, Inc.) which holds an We represent FLAG Telecom Group Services Limited ("FLAG"), the parent of Reliance

appointed to deal with Vanco PLC's financial crisis. Vanco provides important telecommunications services through its virtual network to many domestic and multinational companies. Unfortunately, Vanco PLC, the indirect subject of administration proceedings in the United Kingdom in which an administrator parent of Vanco, is almost out of cash and cannot draw any further on its bank credit the company, the parties must now proceed to close the proposed acquisition immediately in order to avoid insolvency and immediate cessation of services to Vanco's customers. administrator has approved FLAG's bid for Vanco, and in light of the distressed state of has been appointed to manage the company's affairs, business, and property for the benefit of its creditors (similar to a bankruptcy trustee in the United States). The facility. Vanco's CEO recently resigned. A restructuring expert was subsequently ed to deal with Vanco PLC's financial crisis. Vanco PLC ultimately became the

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	SPECIAL INSTRUCTIONS: STA	TELEPHONE NUMBER:	FAX NUMBER: 202-	TELEPHONE NUMBER: (202) 418- 1462	FROM: CEOK	
	STA Ro Vanco/FLAG	551-1791	202-551-0191	4 insta	George (1)	なっしょう

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Paul*Hastings*

Paul, Hastings, Janofsky & Walker LLP 875 15th Street, N.W. Washington, DC 20005 telephone 202-551-1700 · facsimite 202-551-1705 · www.paulhastings.com

Non-Streamlined ITC-STA-20080718-00328 IB2008001761

FLAG Telecom Group Services Limited

ST. ITC. 16-20080527-00239 400241

taragiunta@paulhastings.com (202) 551-1791

Atlanta Beijing Brussels Chicago Frankfurt

July 18, 2008

VIA ECFS

Federal Communications Commission Washington, DC 20002 Suite 110 236 Massachusetts Avenue, N.E. Secretary Marlene H. Dortch

San Diego San Francisco

Washington, DC lokyo Shanghai New York Orange County Palo Alto

Hong Kong London Los Angeles

Wilan

Re: WC Docket No. 08-79

FLAG Telecom Group Services, Inc.

Request for Extension of Special Temporary Authorization

17c-STA-Extension 200805-27 Dy

Dear Sir or Madam:

We represent FLAG Telecom Group Services Limited ("FLAG"), Vanco Solutions, Inc. and Vanco US, LLC (together, "Vanco," and collectively with FLAG, the "Applicants"). On May 27, 2008, the Applicants filed applications (the "Applications") seeking the Commission's consent to transfer control to FLAG of Vanco, which holds international 20080527-00240 to transfer control of Vanco to FLAG pending full FCC review of the Applications for the reasons set forth in the request for such STA. The STA was granted rules. Simultaneously with the filing of the Applications, the Applicants requested special temporary authority ("STA") in WC Docket No. 08-79 and IBFS File No. ITC-STAon May 27, 2008. interstate services under Section 214 of the Act and Section 63.01(a) of the Commission's and ITC-214-20070703-00262, respectively) and blanket authority to provide domestic Section 214 authorizations from the Commission (File Nos. ITC-214-20070703-00260

the Applications will not complete their review prior to such date. The Applicants applicants that they do not object to an extension of the STA. August 25, 2008, so that such review may be completed. Team Telecom has advised the therefore respectfully request that the STA be extended for a period of 30 days, i.e., until Executive Branch agencies (collectively referred to as "Team Telecom") that are reviewing The STA will expire on July 26, 2008, and the Applicants have been informed that the

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date: authorized by iture wiek, SAUNE かとうべる Policy Div, August 25, 2008

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Policy Division

CC: Devise Newster

FAX SHEET

Fax Number: (202) 418-2824

massion is invended only for the addressee shown below. It may contain information that is privileged, co ny review, dissembation or use of this transmission or sis consens by persons other than the addressee a vision in error, please nosily us immediately by telephone and mail the original to us at the Federal Com

		(Extension of 176-55A-20080527-00240)	SPECIAL INSTRUCTIONS: ITC - STA- 2- 8-07-8-0328 (Vanco /FLA)	TELEPHONE NUMBER: 202 457 - 1791	FAX NUMBER: 202 - 551-1705	TO: Tara K Giunta	TELEPHONE NUMBER: (202) 418- 17-6-2	FROM: GROVSE Li	DATE: 1/23108
		-20080527-00240)	P-00328 / Vanco /FLA						

THIS COVER SHEET IS PAGE 1 OF 2 PAGES.

Paul Hastings

Paul, Hastings, Janofsky & Walker LLP Washington, DC 20005 875 15th Street, N.W.

telephone 202-551-1700 • facsimile 202-551-1705 • www.paulhastings.com ITC-STA-20080918-00434

IB2008002282

FLAG Telecom Group Services Limited

taragiunta@paulhastings.com (202) 551-1791

September 18, 2008

Brussels Chicago Frankfurt Hong Kong

Beijing

VIA ECFS

Orange County Palo Alto

New York

Mílan London

Los Angeles

Washington, DC 20002 Marlene H. Dortch Suite 110 236 Massachusetts Avenue, N.E. Federal Communications Commission Secretary

Washington, DC Shanghai San Diego

San Francisco

WC Docket No. 08-79; IBFS File No. ITC-STA-20080811-00376 date: nethor Extension -245 5TC-STA-20080527 hier, といるだ 4-2080527-00 4 Policy Div. Nov. 19. international Bureau Policy Division 2008 -00 241 0 239 4 240

Request for Further Extension of Special Temporary Authorization FLAG Telecom Group Services, Inc. Re:

Dear Sir or Madam:

We represent FLAG Telecom Group Services Limited ("FLAG"), Vanco Solutions, Inc. and Vanco US, LLC (together, "Vanco," and collectively with FLAG, the "Applicants"). On May 27, 2008, the Applicants filed applications (the "Applications") seeking the 00328 (IBFS File No. ITC-STA-20080811-00376). extended until September 24, 2008 with respect to IBFS File No. ITC-STA-20080718-2008 with respect to IBFS File No. ITC-STA-20080527-00240 and WC Docket No. 08-79, respectively (IBFS File No. ITC-STA-20080718-00328). The STA was further on May 27, 2008, and was subsequently extended until August 25, 2008 and September 20, Applications for the reasons set forth in the request for such STA. The STA was granted rules. Simultaneously with the filing of the Applications, the Applicants requested special temporary authority ("STA") in WC Docket No. 08-79 and IBFS File No. ITC-STAinterstate services under Section 214 of the Act and Section 63.01(a) of the Commission's and ITC-214-20070703-00262, respectively) and blanket authority to provide domestic 20080527-00240 to transfer control of Vanco to FLAG pending full FCC review of the Section 214 authorizations from the Commission (File Nos. ITC-214-20070703-00260 Commission's consent to transfer control to FLAG of Vanco, which holds international

that are reviewing the Applications will not complete their review prior to such dates. The Applicants therefore respectfully request that the STA be extended for a period of 60 days informed that the Executive Branch agencies (collectively referred to as "Team Telecom") and IBFS File No. ITC-STA-20080811-00376, respectively, and the Applicants have been The STA will expire September 20 and 24, 2008 with respect to WC Docket No. 08-79

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Fax Number: (202) 418-2824

TELEPHONE NUMBER: (202) 418-1462 TO: J. Steven Rich & B. FAX NUMBER: (202) 418-1462 TELEPHONE NUMBER: 574-20080918-30434 (Vanco /FLAG Extension & TAI-SCA-20080918-30434 (Vanco /FLAG)
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ITC-STA-20081117-00504 IB2008002725

FLAG Telecom Group Services Limited

Paul *Hastings*

Paul, Hastings, Janofsky & Walker LLP 875 15th Street, N.W. Washington, DC 20005 telephone 202-551-1700 • facsimile 202-551-1705 • www.paulhastings.com

(202) 551-1791 taragiunta@paulhastings.com

November 14, 2008

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Beijing Brussels Chicago Frankfurt

VIA ECFS

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Milan

Shanghai

San Diego San Francisco

Washington, DC

Marlene H. Dortch
Secretary
Federal Communications Commission

eng

236 Massachusetts Avenue, N.E. Suite 110

Washington, DC 20002

Re: 17c-16-2080527-00 241

FLAG Telecom Group Services Limited WC Docket No. 08-79; IBFS File No. ITC-STA-20080918-00434

Request for Further Extension of Special Temporary Authorization

Dear Sir or Madam:

We represent FLAG Telecom Group Services Limited ("FLAG"), Vanco Solutions, Inc. and Vanco US, LLC (together, "Vanco," and collectively with FLAG, the "Applicants"): on May 27, 2008, and was subsequently extended until November 19, 2008 and November 17, 2008 with respect to IBFS File No. ITC-STA-20080527-00240 and WC interstate services under Section 214 of the Act and Section 63.01(a) of the Commission's Section 214 authorizations from the Commission (File Nos. ITC-214-20070703-00260 and ITC-214-20070703-00262, respectively) and blanket authority to provide domestic Commission's consent to transfer control to FLAG of Vanco, which holds international On May 27, 2008, the Applicants filed applications (the "Applications") seeking the Applications for the reasons set forth in the request for such STA. The STA was granted 20080527-00240 to transfer control of Vanco to FLAG pending full FCC review of the rules. Simultaneously with the filing of the Applications, the Applicants requested special temporary authority ("STA") in WC Docket No. 08-79 and IBFS File No. ITC-STA-20080811-00376; and ITC-STA-20080918-00434. Docket No. 08-79, respectively. See IBFS File Nos. ITC-STA-20080718-00328; ITC-STA-

to as "Team Telecom") that are reviewing the Applications will not complete their review The STA will expire November 17, 2008 and November 19, 2008 with respect to WC Docket No. 08-79 and IBFS File No. ITC-STA-20080918-00434, respectively, and the extended for a period of 35 days from the date of this letter with respect to WC Docket prior to such dates. The Applicants therefore respectfully request that the STA be Applicants have been informed that the Executive Branch agencies (collectively referred

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FAX SHEET

Fax Number: (202) 418-2824

FAX NUMBER: TELEPHONE NUMBER: SPECIAL INSTRUCTIONS:	TELEPHONE NUMBER: (202) 418-1462
FAX NUMBER: (202) 55 (-0198 TELEPHONE NUMBER: 551-1798 SPECIAL INSTRUCTIONS: 176-27A-2008/1/7-32504 (Vanco/FLAG SPECIAL INSTRUCTIONS: 176-27A-2008/1/7-32504 (Vanco/FLAG	PATE: 1/19/08 FROM: Govse (1): MBER: (202) 418-1462 TO: J. Steven Rich Esb. / Fara K. Giunta

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Paul Hastings

ITC-STA-20081218-00540

FLAG Telecom Group Services Limited IB2008003030

San Diego San Francisco Allanta Beijing Brussels Chicago Frankfurt Palo Allo **Urange County** New York Milan Los Angeles Condon Hong Kong

> taragiunta@paulhastings.com (202) 551-1791

December 18, 2008

VIA ECFS

Washington, DC 20002 Suite 110 236 Massachusetts Avenue, N.E Marlene H. Dortch Federal Communications Commission

Shanghai

Washington, DC

Paul, Hastings, Janofsky & Walker LLP 875 15th Street, N.W. telephone 202-551-1700 · facsimile 202-551-1705 · www.pauthastings.com Washington, DC 20005

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International Bureau Policy Division

date JAN. 19, 2009

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FLAG Telecom Group Services, Inc.

Request for Further Extension of Special Temporary Authorization

WC Docket No. 08-79; IBFS File No. ITC-STA-20081117-00504

Dear Sir or Madam:

rules. Simultaneously with the filing of the Applications, the Applicants requested special temporary authority ("STA") in WC Docket No. 08-79 and IBFS File No. ITC-STA-20080527-00240 to transfer control of Vanco to FLAG pending full FCC review of the Applications for the reasons set forth in the request for such STA. The STA was granted and Vanco US, LLC (together, "Vanco," and collectively with FLAG, the "Applicants"). 22, 2008 with respect to IBFS File No. ITC-STA-20080527-00240 and WC Docket No. 08-79, respectively. See IBFS File Nos. ITC-STA-20080718-00328; ITC-STA-20080811. on May 27, 2008, and was subsequently extended until December 19, 2008 and December interstate services under Section 214 of the Act and Section 63.01(a) of the Commission's Commission's consent to transfer control to FLAG of Vanco, which holds international Section 214 authorizations from the Commission (File Nos. ITC-214-20070703-00260 On May 27, 2008, the Applicants filed applications (the "Applications") seeking the We represent FLAG Telecom Group Services Limited ("FLAG"), Vanco Solutions, Inc and ITC-214-20070703-00262, respectively) and blanket authority to provide domestic 00376; ITC-STA-20080918-00434; and ITC-STA-20081117-00504.

referred to as "Team Telecom") that are reviewing the Applications have completed their Applicants have been informed that while the Executive Branch agencies (collectively Commission in time for the Commission to act on the Applications before expiration of review, Team Telecom will likely be unable to make the requisite filing with the The STA will expire December 22, 2008 and December 19, 2008 with respect to WC Docket No. 08-79 and IBFS File No. ITC-STA-20081117-00504, respectively. The

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Policy Division

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Fax Number: (202) 418-2824

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SPECIAL INSTRU	TELEPHONE N	TELEPHONE N	
CTIONS: MIC- STA	ONE NUMBER: (202) 55 -1798	TELEPHONE NUMBER: (202) 418-14-0C	FROM: Coorge (1)
(Extension \$ Tre-SEA-2008 1718-0527-00 240)	2661-155	Leven Rich 55	1
SPECIAL INSTRUCTIONS: MC - STA - 2008 1718-00540 (Vanco 15)	1. 15.4	TO: J. Steven Rich & St. / Tara K. Giunta	

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