

Re: NetN 2013 0514 - 00137

**Granted**

**NOV 18 2013**

Policy Division  
International Bureau

date:	<u>EXPIRE: May 16, 2014</u>
authorized by:	<u>Chief, Policy Div. IB</u>
signature	<u>James R. [Signature]</u>

ATTACHMENT 1  
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Cascabel Networks, LLC  
Request for Extension of STA

**RESPONSE TO QUESTION 10**

Cascabel Networks, LLC ("Applicant" or "Cascabel"), pursuant to 47 C.F.R. § 63.25, hereby requests that its Special Temporary Authority ("STA") be extended for a period of one-hundred eighty (180) days from November 18, 2013, the date on which its current STA (File No. ITC-STA-20130514-00137) expires. Applicant requests extension of its STA while a separately filed application (File No. ITC-T/C-20130514-00136) for transfer of control of its international Section 214 authority ("Transfer Application") is pending. The Transfer Application is still under review by the "Team Telecom" executive branch agencies.

Regrettably, Applicant was unaware that the change in member interests (the "Transaction") described in its Transfer Application also would be considered a transfer of control of international Section 214 authority requiring prior Commission approval. As explained in the underlying Transfer Application, Applicant believes that international Section 214 authority is arguably unnecessary for the types of service it provides. The only service offered by Applicant is the international termination of voice over internet protocol (VoIP) traffic originated by unaffiliated carrier customers in the U.S. Applicant offers its services only to carrier customers on a private contractual basis (*i.e.*, not on a common carrier basis). Notwithstanding the foregoing, Applicant obtained international Section 214 authority for business purposes as some foreign carriers will only contract with U.S. entities which possess such authority.

Applicant recognizes that it is obligated to follow Commission procedures as a grantee of international Section 214 authority. Thus, the Applicant seeks this STA extension as a remedial measure for its unauthorized transfer of control and, to the extent necessary, to continue providing the international services described above while the Transfer Application is pending. Applicant acknowledges that the grant of this STA extension will not prejudice any action the Commission may take on the underlying Transfer Application. Applicant further acknowledges that this STA extension can be revoked by the Commission upon its own motion without a hearing, and that grant of an STA extension and the underlying Transfer Application will not preclude enforcement action.

**RESPONSE TO QUESTION 12 AND QUESTION 13**

Cascabel is not a foreign carrier. However, upon consummation of the Transaction, Cascabel certifies that it is affiliated with a foreign carrier in Mexico (*i.e.*, any entity that is authorized within a foreign country to engage in the provision of international telecommunications services offered to the public in that country) through the ownership interests of its Members. Cascabel seeks to provide international service to Mexico, a country in which it has foreign carrier affiliations through Members who own more than 25% of Cascabel, as described below.

Mr. Simon Masri, a 30.5% Member of Cascabel, either controls or has a greater than 25 percent ownership interest in the following entities which are authorized within a foreign country to engage in the provision of international telecommunications services to the public in that country:

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PD

*Kristin Taylor*

# INTERNATIONAL BUREAU

## Policy Division

*Dave  
Surrin*

### FAX SHEET

Fax Number: (202) 418-2824

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DATE: 11/18/13

FROM: George Li

TELEPHONE NUMBER: (202) 418-1462

TO: Chang Yi Liu

FAX NUMBER: 703.812-0486

TELEPHONE NUMBER: " 0498

#### SPECIAL INSTRUCTIONS:

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