

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of

Primus Telecommunications, Inc., (PTI)  
Primus Telecommunications Group, Inc., (PTGI)  
PTUS, Inc. (PTUS)  
Collectively (“Applicants”)

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) WC Docket No. 13-145  
) ITC-T/C-20130605-00164  
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**PETITION TO ADOPT CONDITIONS TO  
AUTHORIZATIONS AND LICENSES**

The Department of Justice (“DOJ”), and The Federal Bureau of Investigation (“FBI”), the (“USG Parties”) submits this Petition to Adopt Conditions to Authorizations and Licenses (Petition), pursuant to Section 1.41 of the Federal Communications Commission (“Commission”) rules.<sup>1</sup> Through this Petition, the USG Parties advises the Commission that they have no objection to the Commission approving the authority sought in the above-referenced proceeding, provided that the Commission conditions its approval on the assurance of PTUS, to abide by the commitments and undertakings set forth in the July 16, 2014 Letter of Assurances (“LOA”), which is attached hereto. In the above-referenced proceedings, the Applicants requests Commission consent to the transfer of *de jure* control of section 214 authorizations (WC DK 13-145) held by PTI to PTUS. The Commission has long recognized that law enforcement, national security, and public safety concerns are part of its public interest analysis, and has accorded deference to the views of other U.S. government agencies with expertise in those areas. *See in the matter of Comsat Corporation d/b/a/ Comsat Mobile Communications,*

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<sup>1</sup> 47 C.F.R. § 1.41.

*etc.*, 16 FCC Rcd. 21,661, 21707 ¶ 94 (2001).

After discussions with representatives of the PTUS in connection with the above-referenced proceeding, the USG Parties have concluded that the commitments set forth in the LOA will help ensure that the USG Parties with responsibility for enforcing the law, protecting the national security, and preserving public safety, can proceed appropriately to satisfy those responsibilities. Accordingly, the USG Parties advises the Commission that it has no objection to the Commission granting the application in the above-referenced proceedings, provided that the Commission conditions its consent on compliance with the LOA.

Respectfully submitted,

/S/ Tyrone Brown  
Attorney Advisor  
Foreign Investment Review Staff  
National Security Division  
U.S. Department of Justice

July 17, 2014

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