



Holdings Ltd  
Middlesex House  
29 / 45 High Street  
Edgware HA9 7UU

February 27, 2015

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW,  
Room TW-A325  
Washington, DC 20554

**RE: EX PARTE  
ITC-T/C-20150112-00008, Applications for consent to transfer control of  
international section 214 authorization ITC-21420070228-00088, held by  
Transtelco, Inc. (Transtelco), to Transtelco Holding Inc. (THI)**

Dear Ms. Dortch:

Tekhelet Holdings Ltd (“Tekhelet”) respectfully requests that the Commission take the necessary actions to suspend the Streamlined International Application **ITC-T/C-20150112-00008** filed by Transtelco Inc according to the Public Comment period ending on February 27, 2015 and open a larger review of the details of its application to transfer control of the company. We seek an indefinite suspension of the transfer of control.

It has been brought to our attention that Transtelco intend to be granted transfer of control to their holding company in lieu of their ongoing operations and prior proforma transfer of control by virtue of commercial expansion. Tekhelet respectfully want to bring to the FCC’s attention that a significant share of Transtelco’s current long haul fiber network infrastructure has indeed been acquired through a mosaic of transactions that constitutes handling of stolen goods. The fiber network we refer to is Circuits 7 and 8 currently residing in the Bestel duct, and runs from Laredo Texas to Mexico City at a distance of approximately 2,200 km

Transtelco unlawfully acquired these disputed fibers from Wlcom in December 2012, and recently obtained investment from Wlcoms Principals. Wlcom unlawfully acquired same from CCA, who had joint ownership with Latingroup.



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In April 2011, Tekhelet entered into commercial discussions with Latingroup to acquire Circuits 7 and 8 with the help of Private Equity investment, and after 18 months negotiation concluded with a written agreement to acquire the network, Tekhelet, their outside investors, and legal team spent a great deal of financial, commercial and operational resources on this transaction, which was ultimately forced to discontinue its actions to acquire the network from Latingroup after Transtelco ceased all interaction with Latingroup in 2014.

As Managing Director of Tekhelet, I emphatically state to the Commission that Tekhelet has continued to have interest in this transaction, and hopes that pressure may be put upon Transtelco to immediately recognize the rightful title and ownership to Latingroup in order for Tekhelet and our investors to complete our acquisition.

We further present to the Commission that Transtelco with related parties, seek to petition the United States Federal Communications Commission to transfer assets and obtained rights they do not own, to a new company and uninhibited entity for the purpose to protect the assets and rights from federal prosecution.

Please contact the undersigned should you have any questions about this filing.

Respectfully submitted,

Levi Russell  
Managing Director