



U.S. Department of Justice

National Security Division

Foreign Investment Review Staff

Washington, D.C. 20004

March 22, 2019

By E-File

Ms. Marlene H. Dortch
Federal Communications Commission
445 12th St. SW, Room TW-B204
Washington, DC 20554

**Re: Flock FZ-LLC (f/k/a Riva FZC)
ITC-T/C-20160316-00123**

Dear Ms. Dortch:

The Department of Justice (“DOJ”), Department of Homeland Security (“DHS”) and the Department of Defense (“DOD”) (collectively, the “Agencies”), write to inform the Federal Communications Commission (FCC) that the Agencies are no longer reviewing for national security and law enforcement concerns the March 16, 2016 Application for the unauthorized transfer of control of Flock FZ-LLC from Mr. Bhavin Turakhia to Mr. Divyank Turakhia. After discussing this matter with Flock FZ-LLC’s representatives, we have learned that:

- On March 1, 2016, Flock FZ-LLC changed its ultimate beneficial owner from Bhavin Turakhia to Divyank Turakhia by transferring shares of the ultimate parent company of Flock FZ-LLC (Directi Web Technologies) between these two individuals. This transaction resulted in the transfer of control of the international Section 214 authorization without the FCC’s prior review or approval;
- On March 16, 2016, Flock FZ-LLC filed an application for a transfer of control of its international Section 214 authorization (FCC File No. ITC-T/C-20160316-00123);
- On January 30, 2018, Bhavin Turakhia and Divyank Turakhia engaged in a transaction that resulted in a return to the ownership structure that existed prior to the March 1, 2016 transfer of control of the international Section 214 authorization;
- On February 27, 2018, Flock FZ-LLC applied for and received a Special Temporary Authority (STA) to avoid discontinuance of service to its customers while its application was pending FCC consideration;
- On October 4, 2018 and February 14, 2019, Flock FZ-LLC applied for and received extensions for the STA; and
- On March 13, 2019, Flock FZ-LLC informed the agencies that it had consulted with the FCC on this matter and would be filing a new application for transfer of control of the international Section 214 authorization.

Based upon these facts, on March 16, 2019, DOJ informed Flock FZ-LLC's representatives that the Agencies would no longer review the March 16, 2016 application for national security and law enforcement concerns. As a result, the Agencies are returning the application to the FCC.

Thank you.

Respectfully submitted,

LOYAAN A. EGAL
Deputy Chief
Foreign Investment Review Staff
National Security Division
U.S. Department of Justice

/S/

Lee Licata
Attorney-Advisor

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