

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
GCX Holdings Limited;	)	WC Docket No. 20-38
Vanco US, LLC;	)	ITC-T/C-20200127-00016
Vanco Solutions, Inc.;	)	ITC-T/C-20200127-00017
Reliance Globalcom Services, Inc.;	)	ITC-ASG-20200127-00015
FLAG Telecom Group Services, Limited	)	SCL-ASG-20200127-00005
	)	
Application for Consent to Assign,	)	
or to Transfer Control of, Authorization to	)	
Provide Global or Limited Facilities-based	)	
Resale Services Pursuant to Section 214	)	
of the Communications Act, As Amended	)	

**PETITION TO ADOPT CONDITIONS  
TO AUTHORIZATION AND LICENSE**

Pursuant to Executive Order 13913, the National Telecommunications and Information Administration submits this Petition to Adopt Conditions to Authorizations and Licenses (Petition) on behalf of the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (Committee).<sup>1</sup> Through this Petition, and pursuant to section 1.41 of the Commission’s Rules, the Committee advises the Commission that it has no objection to the Commission approving the above-captioned application, provided that the Commission conditions its approval on the assurance of GCX Holdings Limited, Vanco US, LLC, Vanco Solutions, Inc., Reliance Globalcom Services, Inc., and FLAG Telecom Group Services, Limited (collectively, “the parties”) to abide by the commitments and undertakings set

---

<sup>1</sup> Exec. Order No. 13913, § 9(h), 85 Fed. Reg. 19643, 19647-48 (2020). The Executive Order directs the Committee to “assist the [Commission] in its public interest review of national security and law enforcement concerns that may be raised by foreign participation in the United States telecommunications services sector.” *Id.* § 3(a), 85 Fed. Reg. at 19643.

forth in the two Letters of Agreement (LOAs), dated November 25, 2020, copies of which are attached hereto.<sup>2</sup>

Pursuant to section 214(a) of the Communications Act, the Commission must determine whether a proposed assignment and/or transfer of control of any section 214 authorization will serve the public interest, convenience and necessity.<sup>3</sup> As part of the public interest analysis, the Commission considers whether any such application raises national security, law enforcement, foreign policy, or trade policy concerns related to the applicant's foreign ownership.<sup>4</sup> With regard to these concerns, the Commission has long sought the expertise of the relevant Executive Branch agencies and has accorded deference to their expertise when they have identified such concerns in a particular application.<sup>5</sup>

After discussions with representatives of the parties in connection with the above-captioned application, the Committee has concluded that the additional commitments set forth in the LOAs will help ensure that those agencies with responsibility for enforcing the law, protecting the national security, and preserving public safety can proceed appropriately to satisfy those responsibilities.

---

<sup>2</sup> 47 C.F.R. § 1.41.

<sup>3</sup> 47 U.S.C. § 214(a); *Applications of Cable & Wireless Plc and Columbus New Cayman Limited for Transfer of Control of Cable Landing Licenses and Section 214 Authorizations*, Memorandum Opinion and Order, 30 FCC Rcd 12730, 12734, ¶ 8 (2015).

<sup>4</sup> See *Market Entry and Regulation of Foreign-affiliated Entities*, Report and Order, 11 FCC Rcd 3873, 3888, ¶¶ 38-39 (1995).

<sup>5</sup> *Id.* at 3888, ¶ 39.

Accordingly, the Committee advises the Commission that it has no objection to the Commission granting the above-captioned application, provided that the Commission conditions its consent on compliance with the November 25, 2020 LOAs attached to this filing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kathy Smith".

Kathy Smith  
Chief Counsel

National Telecommunications and  
Information Administration  
1401 Constitution Avenue, NW  
Washington DC 20230  
(202) 482-1816

December 3, 2020