



HARRIS, WILTSHIRE  
& GRANNIS LLP

March 4, 2021

**VIA IBFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

**Re: *Consolidated Application for Consent to Transfer Control of Domestic and International 214 Authority Holder from Denis V. Raue to AppDirect, Inc.,*  
IBFS File No. ITC-T/C-20200710-00115, WCB Docket No. 20-229**

Dear Ms. Dortch:

Denis V. Raue, AppDirect, Inc. (“AppDirect”), and AppSmart TGN, Inc. (f/k/a Telegration, Inc. (“Telegration”), and together with Mr. Raue and AppDirect, the “Applicants”) hereby respectfully request an extension of the Special Temporary Authority (“STA”) for Telegration to continue providing international telecommunications service notwithstanding the prior transfer of control of Telegration to AppDirect, pending the Commission’s review of the above-referenced application for transfer of control (“Application”). Applicants respectfully request that the extension be dated effective as of February 16, 2021, which was the set date of expiration for the STA.

As explained in the Applicants’ initial STA request, Applicants filed the above-referenced application to correct a prior failure to obtain Commission consent before completing the acquisition of Telegration by AppDirect.<sup>1</sup> On December 16, 2020, the Department of Justice filed a notice in the above-referenced proceeding requesting the Commission defer action on the Application pending the review by the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (“Committee”).<sup>2</sup> On December 18, 2020, the International Bureau published a public notice of the Application and referred the Application to the Executive Branch agencies for their views given the foreign ownership of

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<sup>1</sup> See Consolidated Application of Denis V. Raue, Transferor; AppDirect, Inc. Transferee; and AppSmart TGN, Inc. (f/k/a Telegration, Inc.), Authority Holder; for Consent to Transfer Control of Domestic and International Section 214 Authority Holder Application for Special Temporary Authority, WC Docket No. 20-229, IBFS File No. ITC-T/C-20200710-00115 (filed July 10, 2020).

<sup>2</sup> See Letter from Lee Licata, Attorney-Advisor, National Security Division, Department of Justice, to Marlene H. Dortch, Secretary, FCC, IBFS File No. ITC-T/C-2020071000115 (filed Dec. 16, 2020).

AppDirect.<sup>3</sup> On February 22, 2021, the Committee filed a letter with the Commission indicating that the Applicants have completed the responses to the Committee's initial questions, and notified the Commission that the Committee intends to complete its initial review within 120 day of the date the letter.<sup>4</sup>

Applicants therefore respectfully request that the Commission extend the STA for Telegration to continue providing domestic interstate telecommunications service for an additional 180 days, effective as of February 15, 2021, or for such longer period of time as the Commission deems appropriate.

Respectfully submitted,

/s/ Henry Shi  
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cc: David Krech

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<sup>3</sup> See Public Notice, Non Streamlined International Applications/Petitions Accepted for Filing, Report No. TEL-02063NS, (rel. Dec. 18, 2020).

<sup>4</sup> See Letter from Lee Licata, Attorney-Advisor, National Security Division, Department of Justice, to Marlene H. Dortch, Secretary, FCC, IBFS File No. ITC-T/C-2020071000115 (filed Feb. 22, 2020).