

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

In the Matter of)
)
Identidad Advertising Development, LLC)
)
And) **File No.: ITC-214-20030407-00174**
Company Members:)
Identidad Desarrollo Publicitario SAS (Colombia))
Ricardo Álvarez, and Ana María González)
(“Transferors”))
)
And New Members:)
Gabriel Sanchez, Andres Sanchez)
Maria Paulina Merced, James Merced)
(Transferees))
)
Application for Authority Pursuant)
to Section 214 of the Communications Act of 1934,)
as amended, to Transfer Control of international)
facilities-based and resale Authority of common carrier)
_____)

**APPLICATION FOR TRANSFER OF CONTROL OF INTERNATIONAL AUTHORITY OF
IDENTIDAD ADVERTISING DEVELOPMENT, LLC. (FL)**



By and through its Attorney:
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Application

Identidad Desarrollo Publicitario, SAS ("IDP"), controlling Member of Identidad Advertising Development, LLC together with Member Ricardo Alvarez("ALVAREZ") and Member Ana Maria Gonzalez ("GONZALEZ") collectively called "Transferors" together with New Members Gabriel Sanchez ("G. SANCHEZ"), Andres Sanchez("A. SANCHEZ"), Maria Paulina Merced ("M.P. MERCED"), and James Merced ("MERCED") collectively called "Transferees,¹" who all collectively shall be called the "Applicants," hereby request a transfer of control of ownership of the international authority of Identidad Advertising Development, LLC pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. Section 214 et. al. (1982), and Section 63.18 of the Federal Communication Commission's (hereafter called "Commission") Rules² in order to provide global or limited international facilities-based and resale services between the United States and international points, except those international point not

¹ Gonzalez is the wife of G. Sanchez, mother of A. Sanchez and M.P. Merced, and former mother-in-law to Merced. The transferees are family members of Gonzalez.

²Specifically, 47 C.F.R. Section 63.18

authorized by the Commission as updated from time to time on the Commission's Exclusion List under a new ownership structure. In support of this application, the Applicants state as follows:

I. INTRODUCTION: Summary of the Contemplated Transaction

Licensee Identidad Advertising Development, LLC. ("Identidad") is a telecommunications company that provides international telecommunications services pursuant to authority by the Commission under ITC-214-20030407-00174. Identidad provides both international telecommunications services and wholesale international VoIP services to the public, other private carriers, as well as consumers. Identidad has operated since 2003. IDP and ALVAREZ now wish to pursue other business interests outside of telecommunications and transfer their interests in Identidad. The New Members have managed the affairs of Identidad since 2003 and wish to continue the business of Identidad and continue its services to the public and resale carriers, and ensure that services to carriers and consumers alike are uninterrupted going forward with the same quality of services as prior. The New Members are related to GONZALEZ through family ties and family relations.³

ALVAREZ, IDP and GONZALEZ have agreed to a transaction ("Transaction") wherein they will transfer units presently held to the New Members with GONZALEZ remaining a Member of the company in equal position to the individual New Members, each holding 16.66% of the outstanding and issued membership units. This will not be a cash transaction. Instead New Members will assume all guaranties of debt or credit lines on the Licensee and all liabilities of the company, in exchange for full release of IDP, GONZALEZ and ALVAREZ. The Transaction will be entirely seamless for consumers and carriers dealing with Identidad, as it will not result in any change in the management of Identidad or discontinue or impair Identidad services. On the contrary, the Transaction will only better enable Identidad to continue offering its services. Subject to the Commission's approval, the transaction will be consummated.

The transaction will be accomplished in two steps that shall be effectuated at closing. Applicant ALVAREZ presently holds twenty-four percent (24%) interest in the Licensee. At the onset of the transaction ALVAREZ will transfer all his Membership Units in the Licensee to IDP (ALVEREZ TRANSFER). IDP will then hold a total of 75% of the membership units for further

³ See, Note 1 infra.

transfer to Applicants G. SANCHEZ, A. SANCHEZ, M.P. MERCED and MERCED. The ALVEREZ TRANSFER is done only for the purpose of transactional convenience to make final transfer of units easier and avoid odd numbered unit interests needing to be disposed. Next, IDP and GONZALEZ will make a final transfer to G. SANCHEZ, A. SANCHEZ, M.P. MERCED and MERCED (FINAL TRANSFER). A true and correct illustration of the ALVAREZ TRANSFER and FINAL TRANSFER are found in Exhibit B of this application. Applicants G. SANCHEZ, GONZALEZ, A. SANCHEZ, M.P. MERCED and MERCED are United States citizens. ALVAREZ is a Colombian national. IDP is a Colombian simplified stock company (SAS) controlled by ALVAREZ. Upon consummation of the transaction, with Commission approval, the ALVAREZ TRANSFER and FINAL TRANSFER will be performed. Neither G.SANCHEZ, A. SANCHEZ, M. SANCHEZ nor MERCED, or any companies under their control, are affiliated with a foreign carrier in a destination market, or have an affiliation with a dominant U.S. carrier whose international switched or private line services it seeks authority to resell.

The telecommunications business of the Licensee is resale of international services and it serves no end-user subscribers. Licensee serves carrier customers throughout the United States, but primarily those in the state of Florida. By granting this application, the Commission will serve the public interest, convenience and necessity by promoting competition in the international services market. Competition will benefit U.S. consumers by increasing service options and lowering prices. Thus, the public interest will be served by the grant of this Application Request from the above Transferor to the above Transferee(s) of Identidad Advertising Development's international Section 214 authority.

II. Request for Streamlined Processing as to G. SANCHEZ, A. SANCHEZ, M.P. MERCED and MERCED

As related to Applicants G. SANCHEZ, A. SANCHEZ, M.P. MERCED and MERCED the Applicants respectfully submit that this Application is eligible for streamlined processing pursuant to the Commission's Rules, found at 47 C.F.R. § 63.12(a). This Application is eligible for streamlined processing pursuant to Section 63.03(b)(2)(i) because, immediately following the transactions: (1) No applicant or its affiliate(s), as defined in Section 3(1) of the Communications Act (hereafter called "Affiliates") combined shall hold a ten percent (10%) or more share of the interstate and/or

interexchange market; and (2) neither the Applicant nor their Affiliates are, or will be, dominant with respect to any service before or after the transaction.⁴

In support of this Application, Applicants provide the following information:

II. DESCRIPTION OF THE APPLICANT

A. Identidad Advertising Development, LLC (“Licensee”)

Identidad Advertising Development, LLC is a Florida Limited Liability Company operating from the State of Florida and provides global facilities based and resold international telecommunications services to the public pursuant to 47 U.S.C. § 214 et. al. under Commission Authority **ITC-214-20030407-00174**.

B. Company Members (Transferors)

1. Identidad Desarrollo Publicitario, SAS (IDP)

Identidad Desarrollo Publicitario, SAS is a simplified stock corporation (*sociedad por acciones simplificada*) incorporated and registered under the laws of the Republic of Colombia domicile at Carrera 7 57 05 Of 1104 Bogota, Colombia. IDP presently holds fifty-one percent (51%) of Licensee’s outstanding equity and membership interest. IDP provides no telecommunication services in Colombia and holds interest in Licensee as an investment. IDP has been an owner of the Licensee since FCC grant of license on May 2, 2003. IDP is operated and controlled by ALVAREZ.

2. Ricardo Alvarez (ALVAREZ)

ALVAREZ is natural person and citizen of the Republic of Colombia domicile at Carrera 7 57 05 Of 1104 Bogota, Colombia. ALVAREZ

⁴This Application satisfies the criteria for streamlined processing pursuant to Section 63.12(a) of the Commission’s rules, because none of the provisions of Section 63.12(c) of the Commission’s rules, that prevent streamlined treatment, apply to the proposed Transaction. No Applicant is affiliated with a foreign carrier in a destination market, nor do any have an affiliation with a dominant U.S. carrier whose international switched or private line services it seeks authority to resell. Pursuant to Section 63.12(a) of the Commission’s rules, the Commission should deem this Application granted on the 15th day after the date of the public notice listing this Application as accepted for filing.

presently holds twenty-four percent (24%) of Licensee's outstanding equity and membership interest. ALVEREZ operates and controls IDP in Colombia. ALVEREZ' involvement in Licensee is as an investor. ALVAREZ has been an owner of the Licensee since FCC grant of license on May 2, 2003.

3. Ana Maria Gonzalez (GONZALEZ)

GONZALEZ is natural person, U.S. Citizen and resident of the State of Florida domicile at 848 Brickell Ave, Suite 810 Miami, FL 33131 for purposes of this Application. [*Home address available to Commission upon request. Home address redacted here for purposes of privacy, FOIA and public notice requirements.*] GONZALEZ presently holds twenty-four percent (24%) of Licensee's outstanding equity and membership interest. GONZALEZ currently serves as Manager of the Licensee, and this management position will not change post-Transaction. GONZALEZ is married to Applicant G. SANCHEZ and presently holds her interest in the Licensee as a marital asset under Florida law. GONZALEZ is a United States Citizen. GONZALEZ has been an owner of the Licensee since FCC grant of license on May 2, 2003. GONZALEZ is not affiliated with any company holding a dominant position in any international market. Under the contemplated Transaction, GONZALEZ will transfer Membership and equity interest in the Licensee from herself to her husband G SANCHEZ.

C. New Members (Transferees)

1. Gabriel Sanchez (G. SANCHEZ)

G. SANCHEZ is natural person, U.S. Citizen and resident of the State of Florida domicile at 848 Brickell Ave, Suite 810 Miami, FL 33131 for purposes of this Application. [*Home address available to Commission upon request. Home address redacted here for purposes of privacy, FOIA and public notice requirements.*] G. SANCHEZ presently holds no percentage of Licensee's outstanding equity and membership interest. G.

SANCHEZ is married to Applicant GONZALEZ who presently holds twenty-for percent (24%) interest in the Licensee as a marital asset under Florida law with G. SANCHEZ. G. SANCHEZ currently serves as Manager and CEO of the Licensee, and this management position will not change post-Transaction. G. SANCHEZ is a United States Citizen. G. SANCHEZ is not affiliated with any company holding a dominant position in any international market. Under the contemplated Transaction, GONZALEZ will transfer her 24% (twenty-four percent) of her Membership and equity interest in the Licensee to her husband G. SANCHEZ, and IDP will transfer 9.34% (Nine point thirty-four percent) Membership and equity interest in the Licensee to G. SANCHEZ for a combined total of 33.34% (thirty-three point thirty-four percent).

2. Andres Sanchez (A. SANCHEZ)

A. SANCHEZ is natural person, U.S. Citizen and resident of the State of Florida domicile at 848 Brickell Ave, Suite 810 Miami, FL 33131 for purposes of this Application. [*Home address available to Commission upon request. Home address redacted here for purposes of privacy, FOIA and public notice requirements.*] A. SANCHEZ presently holds no percentage of Licensee's outstanding equity and membership interest. A. SANCHEZ currently serves as Manager of the Licensee, and this management position will not change post-Transaction. A. SANCHEZ is the brother of Applicant M. SANCHEZ. A. SANCHEZ is a United States Citizen. A. SANCHEZ is not affiliated with any company holding a dominant position in any international market. Under the contemplated Transaction, IDP will transfer 33.34% (thirty-three point thirty-four percent) Membership and equity interest in the Licensee to A. SANCHEZ.

3. Maria Paulina Merced (M.P. MERCED)

M.P. MERCED is natural person, U.S. Citizen and resident of the State of Florida domicile at 848 Brickell Ave, Suite 810 Miami, FL 33131 for

purposes of this Application. [*Home address available to Commission upon request. Home address redacted here for purposes of privacy, FOIA and public notice requirements.*] M.P. MERCED presently holds no percentage of Licensee's outstanding equity and membership interest. M.P. MERCED currently serves as Manager and Vice President of the Licensee, and this management position will not change post-Transaction. M.P. MERCED is the sister of Applicant A. SANCHEZ and daughter of Applicant G. SANCHEZ. M.P. MERCED is a United States Citizen. M.P. MERCED is not affiliated with any company holding a dominant position in any international market. Under the contemplated Transaction, IDP will transfer 16.66% (Sixteen point sixty-six percent) Membership and equity interest in the Licensee to M.P. MERCED.

4. James Merced (MERCED)

MERCED is natural person, U.S. Citizen and resident of the State of Florida domicile at 848 Brickell Ave, Suite 810 Miami, FL 33131 for purposes of this Application. [*Home address available to Commission upon request. Home address redacted here for purposes of privacy, FOIA and public notice requirements.*] MERCED presently holds no percentage of Licensee's outstanding equity and membership interest. MERCED currently serves as Manager and CFO of the Licensee, and this management position will not change post-Transaction. MERCED is a United States Citizen. MERCED is not affiliated with any company holding a dominant position in any international market. Under the contemplated Transaction, IDP will transfer 16.66% (Sixteen point sixty-six percent) Membership and equity interest in the Licensee to MERCED.

Under the contemplated Transaction, GONZALEZ, ALVAREZ and IDP will transfer certain percentages of Membership and equity interest in the Licensee from themselves to Applicants G.SANCHEZ, A. SANCHEZ, M.P. MERCED and MERCED with GONZALEZ remaining as an officer and owner of the Identidad Advertising Development, LLC. Thereafter, Identidad Advertising Development may be structured

as a holding company or under a holding company under the control of the Applicants. This shall be determined based upon need of the Applicant and the Licensee after approval and final consummation of this application.

III PUBLIC INTEREST CONSIDERATIONS:

The Applicant believes that the added competition the contemplated transaction and this transfer of control will bring to the market will benefit the consumers of United States-international telecommunications services, and specifically those in the State of Florida and in territories where Identidad Advertising Development, LLC presently provides services. This includes competitive pricing of services and increased availability of a variety of innovative service options. Therefore, grant of this Application will further the public interest.

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Application Attachment I.
(Information pursuant to 47 CFR § 63.12)

The following information is submitted, as required by 47 CFR § 63.12 of the Commission’s Rules, in support of the Applicant’ request for transfer of Control of Identidad Advertising Development’ authorization:

In Response to Question 9 of the Application: The Applicants respectfully request streamline processing pursuant to 47 CFR § 63.12 and certifies that:

1. None are not affiliated with a foreign carrier in a destination market it seeks authority to serve by the grant of this authority;
2. None have affiliation with a dominant U.S. carrier who is an international switched or private line services the Applicant or the Licensee seeks authority to resell, either directly or indirectly through the resale of another reseller’s service(s);
3. It does not seek authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines.
4. The Commission has not informed any Applicant or Identidad Advertising Development in writing that this Application is not eligible for streamlined processing.

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Application Attachment II.
(Information pursuant to 47 CFR § 63.18)

The following information is submitted, as required by 47 CFR § 63.18 of the Commission’s Rules, in support of Applicant’s request for authorization:

47 CFR § 63.18(a): The names, addresses and telephone numbers of the Applicant are as follows:

Licensee:

Identidad Advertising Development, LLC FRN: 0007804123
848 Brickell Ave, Suite 810
Miami, Florida 33131
Tel: (786) 242-2224
Attn: Ms. Ana Maria Gonzalez, Manager

Transferor(s):

Identidad Desarrollo Publicitario, SAS FRN: 0029595816
Carrera 7 57 05 Of 1104
Bogota, Colombia

Ricardo Alvarez
Carrera 7 57 05 Of 1104
Bogota, Colombia

FRN: 0029595832

Ana Maria Gonzalez
848 Brickell Ave, Suite 810
Miami, Florida 33131
Tel: (786) 242-2224

FRN: 0029598588

Transferee(s):

Gabriel Sanchez
848 Brickell Ave, Suite 810
Miami, Florida 33131
Tel: (786) 242-2224

FRN: 0029595873

Andres Sanchez
848 Brickell Ave, Suite 810
Miami, Florida 33131
Tel: (786) 242-2224

FRN: 0029595964

Maria Paulina Merced
848 Brickell Ave, Suite 810
Miami, Florida 33131
Tel: (786) 242-2224

FRN: 0029596012

James Merced
848 Brickell Ave, Suite 810
Miami, Florida 33131
Tel: (786) 242-2224

FRN: 0029596038

47 CFR § 63.18(b): Jurisdiction of Persons

(1) Licensee: Identidad Advertising Development, LLC is a limited liability company incorporated under the laws of the State of Florida.

(2) Transferor(s):

- a. Identidad Desarrollo Publicitario, SAS is a simplified stock corporation incorporated and registered under the laws of the Republic of Colombia
- b. Ricardo Alvarez is a natural person, Colombian Citizen and resident of the Municipality of Bogota, Colombia.
- c. Ana Maria Gonzalez is a natural person, United States Citizen and resident of the State of Florida.

(3) Transferee(s)

- a. Gabriel Sanchez is a natural person, a United States Citizen and a resident of the State of Florida.
- b. Andres Sanchez is a natural person, a United States Citizen and a resident of the State of Florida.
- c. Maria Paulina Merced is a natural person, a United States Citizen and a resident of the State of Florida.
- d. James Merced is a natural person, a United States Citizen and a resident of the State of Florida.

48 CFR § 63.18(c): Correspondence concerning this application should be sent to:

Identidad Advertising Development, LLC
848 Brickell Ave, Suite 810
Miami, FL 33131
Tel: (786) 242-2224
Attn: Ms. Ana Maria Gonzalez

Copy for all to: Edward A. Maldonado, Esq.
Maldonado Law
2850 S Douglas Rd. Suite 303
Coral Gables, FL 33134
Tel: 305-477-7580 Fax: 305-477-7504
E-mail: eam@maldonado-group.com

Identidad Desarrollo Publicitario, SAS
Carrera 7 57 05 Of 1104
Bogota, Colombia

Ricardo Alvarez
Carrera 7 57 05 Of 1104
Bogota, Colombia

Ana Maria Gonzalez
848 Brickell Ave, Suite 810
Miami, Florida 33131
Tel: (786) 242-2224

Gabriel Sanchez
848 Brickell Ave, Suite 810
Miami, Florida 33131
Tel: (786) 242-2224

Andres Sanchez
848 Brickell Ave, Suite 810
Miami, Florida 33131
Tel: (786) 242-2224

Maria Paulina Merced

848 Brickell Ave, Suite 810
Miami, Florida 33131
Tel: (786) 242-2224

James Merced

848 Brickell Ave, Suite 810
Miami, Florida 33131
Tel: (786) 242-2224

In Response to Question 14 and 15 of FCC 214 Application:

47 CFR § 63.18(d): Identidad Advertising Development, LLC has previously received authority under Section 214 of the Act. Applicants GONZALEZ, ALVAREZ and IDP have been previously approved by the Commission as owners of the Licensee on May 2, 2003.

47 CFR § 63.18(e): Applicant by and through their interests in Identidad Advertising Development, LLC request approval for global or limited facilities-based and resale services under Section 214 of the Act and pursuant to the terms and conditions of Section 63.18(e)(1) and (e)(2) of the Commission's Rules. Applicant is not applying for authority to acquire facilities or to provide services not covered by paragraphs (e)(1) through (e)(3) of Section 63.18. Applicant is not seeking facilities-based authority under paragraph (e)(4) of Section 63.18.

47 CFR § 63.18(g): Applicant by and through their interests in Identidad Advertising Development, LLC will use previously authorized facilities to provide the services requested by the Application. Applicant are excluded from environmental assessment pursuant to Section 1.1306 of the Commission's Rules, specifically 47 C.F.R. § 1.1306.

CFR § 63.18(h): Following the completion of the transaction between the Applicant the information regarding the 10% or greater direct or indirect owners of Identidad Advertising Development, LLC shall be as follows:

Name:	Gabriel Sanchez
Address:	848 Brickell Ave, Suite 810 Miami, Florida 33131
Citizenship:	United States
Principal Business:	Telecommunications
Ownership:	33.34%

Name: Andres Sanchez
Address: 848 Brickell Ave, Suite 810 Miami, Florida 33131
Citizenship: United States
Principal Business: Telecommunications
Ownership: 33.34%

Name: Maria Paulina Merced
Address: 848 Brickell Ave, Suite 810 Miami, Florida 33131
Citizenship: United States
Principal Business: Telecommunications
Ownership: 16.66%

Name: James Merced
Address: 848 Brickell Ave, Suite 810 Miami, Florida 33131
Citizenship: United States
Principal Business: Telecommunications
Ownership: 16.66%

47 CFR § 63.18(i): Applicants G. Sanchez, A. Sanchez, P.M. Merced, Merced, and Gonzalez certify that they are not affiliated with any foreign facilities-based carriers or US dominant carriers.

47 CFR § 63.18(j) Applicants G. Sanchez, A. Sanchez, P.M. Merced, Merced, and Gonzalez certify that they do not seek to provide international telecommunication services to any destination country for which any of the following are true:

1. Identidad Advertising Development, LLC is a foreign carrier in that country; or
2. Identidad Advertising Development, LLC controls a foreign carrier in that country; or
3. Any entity that owns more than twenty-five percent (25%) of Identidad Advertising Development, LLC, or that controls Identidad Advertising Development, LLC, controls a foreign carrier in that country.

47 CFR § 63.18(k): Not Applicable.

47 CFR § 63.18(l): Not Applicable.

47 CFR § 63.18(m): Not Applicable.

47 CFR § 63.18(n): The **Applicants** and **Identidad Advertising Development, LLC** certify that they have not agreed and will not agree in the future to accept any direct or indirect special concessions from a foreign carrier or administration with regards to traffic or revenue flows between the United States and any foreign countries the company is authorized to serve.

47 CFR § 63.18(o): The **Applicant** certify that no party to this application has been denied federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

47 CFR § 63.18(p): The **Applicant** respectively request Streamline Processing of this Application pursuant to Section 63.12 of the Commission's Rules under 47 C.F.R. § 63.12.

CONCLUSION

In conclusion of the foregoing Application and Attachments, the Applicant, by and through Ana Maria Gonzalez, certify that all of the information in this application is accurate and correct. For these reasons, respectfully requests that the Commission grant this application.

Respectfully submitted,

By: /s/ Ana Maria Gonzalez
Name: **Ana Maria Gonzalez**
Title: Managing Member of
Identidad Advertising Development, LLC (a Florida limited liability
company)

By and through their attorney:



/s/ Edward A. Maldonado /s/
Edward A. Maldonado, Esq.
MALDONADO LAW GROUP
2850 Douglas Road, Suite 303, Coral Gables, FL 33134
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VERIFICATION

I, Ana Maria Gonzalez, state that I am Managing Member of Identidad Advertising Development, LLC; that I am authorized to make this Verification on behalf of the Applicant; that the foregoing filing was prepared under my direction and supervision; and that the contents are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this May 25, 2020.

By: /s/ Ana Maria Gonzalez
Name **Ana Maria Gonzalez**
Title: Managing Member of
On behalf of Identidad Advertising Development, LLC
a Florida limited liability company

Ricardo Alvarez hereby certifies, with respect to the foregoing application for Section 214 Authority to provide international services that:

1. He is not affiliated with any foreign carrier in any of the countries to which he proposes to provide service in the foregoing application.
2. He will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.F.R. 63.21-.23
3. He does not provide international telecommunications service to any destination where: (1) he is a foreign caller in that country; (2) he controls a foreign carrier with market dominance in that country; (3) any entity that owns more than a 25% interest in or controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% and are parties to, or the beneficiaries of, a contractual relationship that affects that provision or marketing of international basic telecommunications services in the United States as a result of this application.
4. Ricardo Alvarez states he has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future
5. Ricardo Alvarez states he is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

The contents of the Application are true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,

This May 25, 2020

By:
Name:

/s/ Ricardo Alvarez
Ricardo Alvarez, personally

CERTIFICATION OF COMPANY MEMBER / TRANSFEROR – ANA MARIA GONZALEZ.

Maria Gonzalez hereby certifies, with respect to the foregoing application for Section 214 Authority to provide international services that:

1. She is not affiliated with any foreign carrier in any of the countries to which he proposes to provide service in the foregoing application.
2. She will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.F.R. 63.21-.23
3. She does not provide international telecommunications service to any destination where: (1) he is a foreign caller in that country; (2) he controls a foreign carrier with market dominance in that country; (3) any entity that owns more than a 25% interest in or controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% and are parties to, or the beneficiaries of, a contractual relationship that affects that provision or marketing of international basic telecommunications services in the United States as a result of this application.
4. Maria Gonzalez states she has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future
5. Maria Gonzalez states she is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

The contents of the Application are true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,

This May 25, 2020

By:
Name:

/s/ Ana Maria Gonzalez
Ana M. Gonzalez, personally

CERTIFICATION OF TRANSFEREE APPLICANT – GABRIEL SANCHEZ.

Gabriel Sanchez hereby certifies with respect to the foregoing application for Section 214 Authority to provide international services that:

6. He is not affiliated with any foreign carrier in any of the countries to which he proposes to provide service in the foregoing application.
7. He will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.F.R. 63.21-.23
8. He does not seek to provide international telecommunications service to any destination where:
(1) he is a foreign caller in that country; (2) he controls a foreign carrier with market dominance in that country; (3) any entity that owns more than a 25% interest in or controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% and are parties to, or the beneficiaries of, a contractual relationship that affects that provision or marketing of international basic telecommunications services in the United States as a result of this application.
9. Gabriel Sanchez states he has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future
10. Gabriel Sanchez states he is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

The contents of the Application are true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,

This May 25, 2020

By:
Name:

/s/Gabriel Sanchez
Gabriel Sanchez, personally

CERTIFICATION OF TRANSFEREE APPLICANT – ANDRES SANCHEZ.

Andres Sanchez hereby certifies with respect to the foregoing application for Section 214 Authority to provide international services that:

1. He is not affiliated with any foreign carrier in any of the countries to which he proposes to provide service in the foregoing application.
2. He will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.F.R. 63.21-.23
3. He does not seek to provide international telecommunications service to any destination where: (1) he is a foreign caller in that country; (2) he controls a foreign carrier with market dominance in that country; (3) any entity that owns more than a 25% interest in or controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% and are parties to, or the beneficiaries of, a contractual relationship that affects that provision or marketing of international basic telecommunications services in the United States as a result of this application.
4. Andres Sanchez states he has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future
5. Andres Sanchez states he is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

The contents of the Application are true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,

This May 25, 2020

By:
Name:

/s/ Andres Sanchez
Andres Sanchez, personally

CERTIFICATION OF TRANSFEREE APPLICANT – MARIA P. MERCED.

Maria Paulina Merced hereby certifies with respect to the foregoing application for Section 214 Authority to provide international services that:

1. She is not affiliated with any foreign carrier in any of the countries to which he proposes to provide service in the foregoing application.
2. She will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.F.R. 63.21-.23
3. She does not seek to provide international telecommunications service to any destination where: (1) he is a foreign caller in that country; (2) he controls a foreign carrier with market dominance in that country; (3) any entity that owns more than a 25% interest in or controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% and are parties to, or the beneficiaries of, a contractual relationship that affects that provision or marketing of international basic telecommunications services in the United States as a result of this application.
4. Maria P. Merced states she has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future
5. Maria P. Merced states she is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

The contents of the Application are true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,

This May 25, 2020

By:
Name:

/s/ Maria Paulina Merced
Maria P. Sanchez, personally

CERTIFICATION OF TRANSFEREE APPLICANT – JAMES MERCED.

James Merced hereby certifies with respect to the foregoing application for Section 214 Authority to provide international services that:

1. He is not affiliated with any foreign carrier in any of the countries to which he proposes to provide service in the foregoing application.
2. He will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.F.R. 63.21-.23
3. He does not seek to provide international telecommunications service to any destination where: (1) he is a foreign caller in that country; (2) he controls a foreign carrier with market dominance in that country; (3) any entity that owns more than a 25% interest in or controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% and are parties to, or the beneficiaries of, a contractual relationship that affects that provision or marketing of international basic telecommunications services in the United States as a result of this application.
4. James Merced states he has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future
5. James Merced states he is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

The contents of the Application are true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,

This May 25, 2020

By:
Name:

/s/ James Merced
James Merced, personally

CERTIFICATION OF APPLICANT -LICENSEE

The undersigned hereby certifies, on behalf of Identidad Advertising Development, LLC, Inc. with respect to the foregoing application for Section 214 Authority to provide international services that:

1. Identidad Advertising Development, LLC is not affiliated with any foreign carrier in any of the countries to which Identidad Advertising Development, LLC proposes to provide service in the foregoing application.
2. Identidad Advertising Development, LLC will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.F.R. 63.21-.23
3. Identidad Advertising Development, LLC does not seek to provide international telecommunications service to any destination where: (1) Identidad Advertising Development, LLC is a foreign caller in that country; (2) Identidad Advertising Development, LLC controls a foreign carrier in that country; (3) any entity that owns more than a 25% interest in Identidad Advertising Development, LLC, or controls Identidad Advertising Development, LLC, controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% of Identidad Advertising Development, LLC and are parties to, or the beneficiaries of, a contractual relationship that affects that provision or marketing of international basic telecommunications services in the United States.
4. Identidad Advertising Development, LLC has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future
5. Identidad Advertising Development, LLC is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
6. The contents of the Application are true and correct to the best of my knowledge, information, and belief.

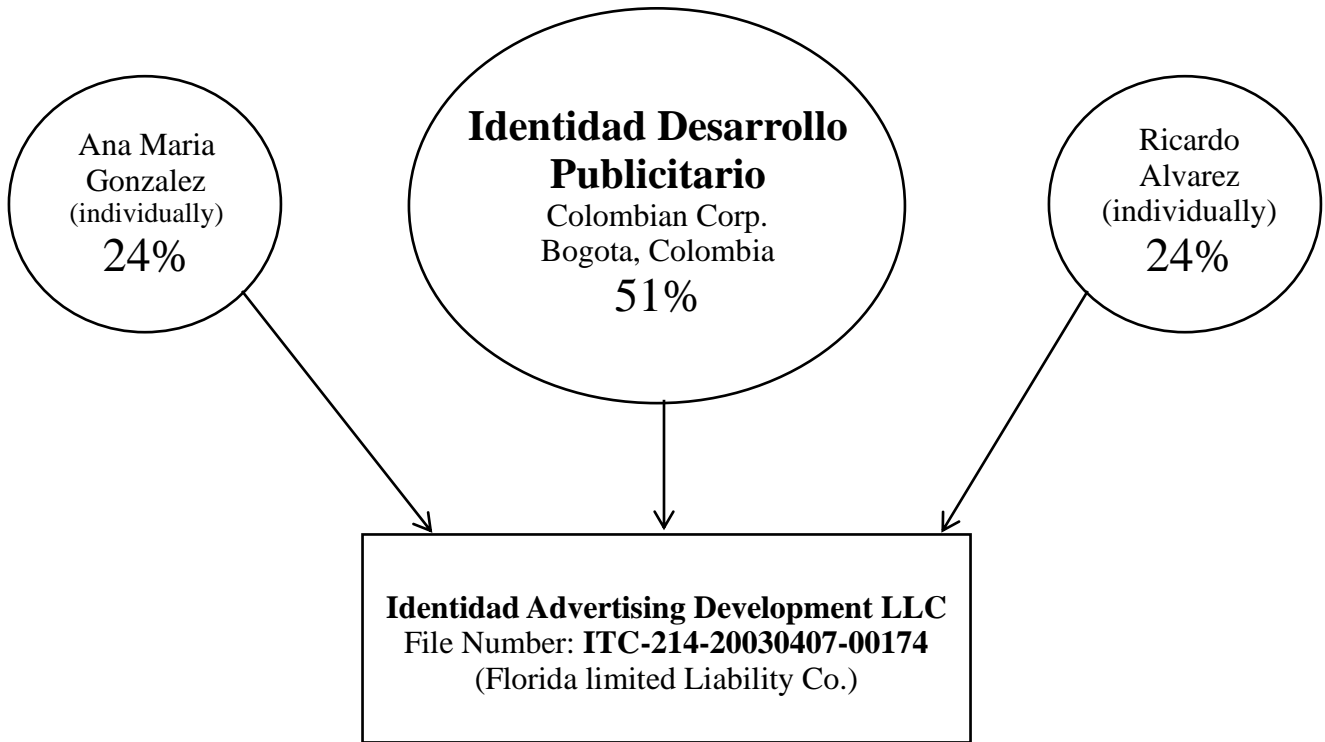
Respectfully submitted,

This May 25, 2020

By:
Name
Title:

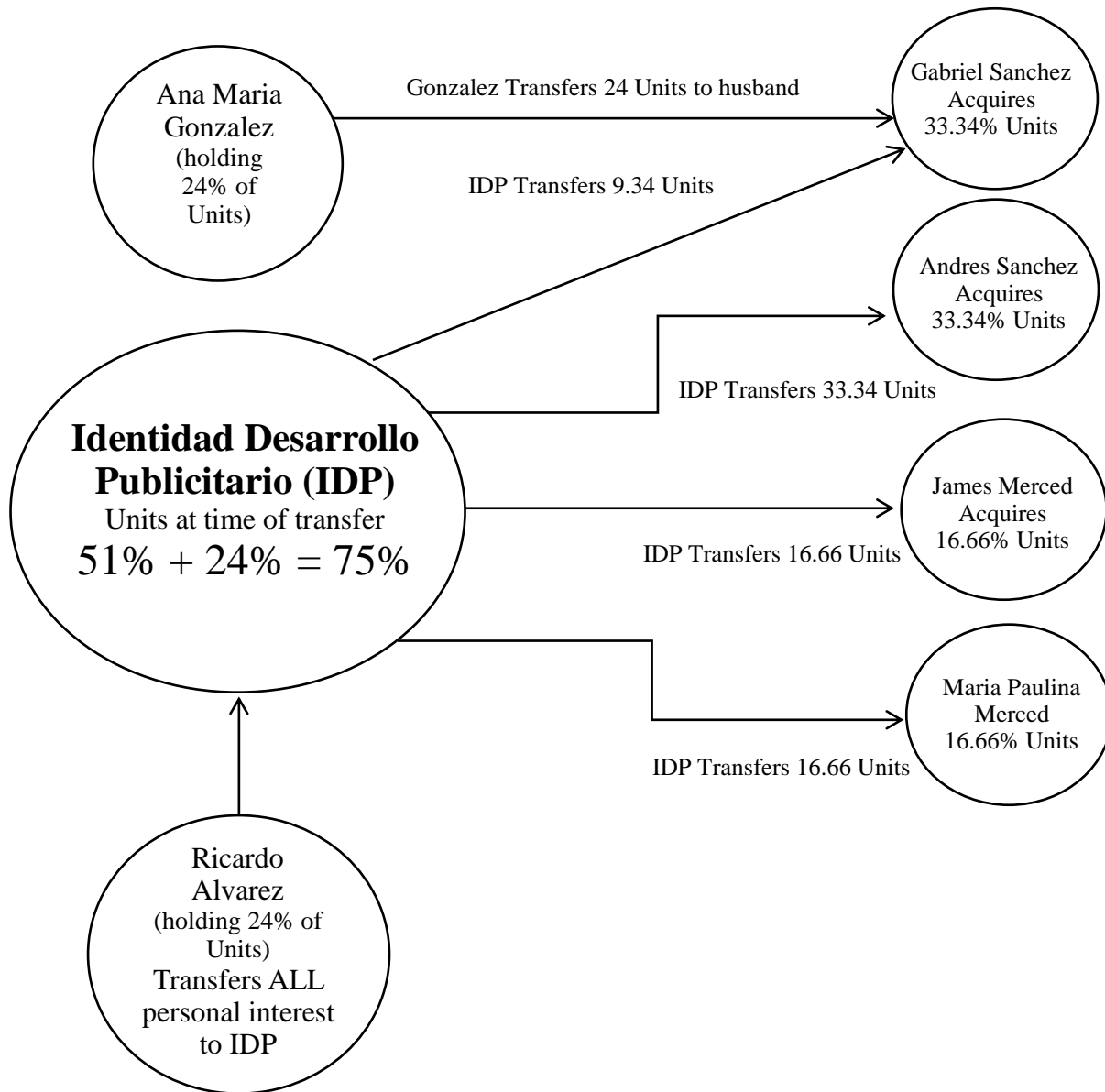
/s/ Ana Maria Gonzalez
Ana Maria Gonzalez
Managing Member of
On behalf of Identidad Advertising
Development, LLC
a Florida limited liability company

Pre-Transaction Structure Diagram



Contemplated Transaction Structure Diagram

1. Ricardo Alvarez transfers all 24% of Units he owns personally in licensee to IDP.
2. Ana Maria Gonzalez transfers 24% of Units she owns personally in licensee to Mr. Gabriel Sanchez.
3. IDP transfers all 75% of Units it owns personally in licensee to Sanchez Family, as follows:



Post-Transaction Structure Diagram

