



Federal Communications Commission
Washington, D.C. 20554

July 11, 2018

Steve Lang
Acting Director
International Communication and Information Policy
Office of Multilateral Affairs
U.S. Department of State
2201 C Street, NW, Room 4634
Washington, D.C. 20520

Re: Recommendation for Limitless Mobile, LLC to be Designated as a Recognized Operating Agency, File No. ROA-NEW-20180531-00001

Dear Mr. Lang:

On May 31, 2018, Limitless Mobile, LLC (Limitless) filed the application referenced above requesting designation as a recognized operating agency (ROA) under Section 63.701 of the Commission's rules.¹ On June 28, 2018, the Federal Communications Commission's International Bureau issued a Public Notice listing the application as accepted for filing and established a cycle for informal comments on the request.² We received no comments and based on the information before us, we recommend that the U.S. Department of State grant Limitless's request to be designated as an ROA.

Our review of the application indicates that Limitless has provided all the information required to be designated as an ROA under Section 63.701 of the Commission's rules.³ Limitless's application states that it is a limited liability company organized under the laws of Delaware, with its principal offices located in Harrisburg, PA. In 2010, the Commission granted Limitless (then called Keystone Wireless, LLC) a global or limited global authorization as a resale common carrier under Section 214 of the Communications Act of 1934, as amended (the Act).⁴

Additionally, Limitless has stated its intention to honor its obligations under the mandatory provisions of the Convention and any rules promulgated thereafter, as required by Section 63.701 of the Commission's rules.⁵ Limitless states that it is aware of its obligations under Article 44 of the ITU Convention and that it will obey the mandatory provisions of the International Telecommunication Convention, Edition Nice, 1989 (Convention) and the International Telecommunication Regulations (ITRs) promulgated under them in all respects.⁶ Limitless also states in accordance with Section 63.701

¹ 47 CFR § 63.701.

² FCC, International Bureau, *Recognized Operating Agency re: Applications Accepted for Filing*, Public Notice, Report No. ROA-00009 (IB rel. June 28, 2018).

³ 47 CFR § 63.701.

⁴ FCC, International Bureau, *International Authorizations Granted, Section 214 Applications (47 C.F.R. § 63.18); Section 310(b)(4) Requests*, Report No. TEL-01433, 25 FCC Rcd 7507 (IB 2010); 47 U.S.C. § 214.

⁵ 47 CFR § 63.701.

⁶ *Id.*

that it is aware that a failure to obey the mandatory provisions of the Convention and the ITRs could result in an order by the Commission for it to cease and desist from future violations and could result in revocation of its formal ROA status by the U.S. Department of State.⁷

By virtue of the Commission's grant of Limitless's international Section 214 authorization, Limitless is a common carrier authorized under Section 214 of the Act.⁸ As such, the various services it has been authorized to provide constitute "public correspondence," as that term is defined in the Convention. As a result, Limitless is an ROA and it is appropriate to formally recognize that status. We recommend that the U.S. Department of State designate Limitless as an ROA, as requested in its application.

For further information or any questions, please contact me at (202) 418-0574 or by email at denise.coca@fcc.gov or Arthur Lechtman at (202) 418-1465 or by email at arthur.lechtman@fcc.gov. We also request that the U.S. Department of State send a copy of the Department's action on this application to the emails above for our records.

Sincerely,



Denise Coca
Division Chief
Telecommunications and Analysis Division
International Bureau

cc: Amirali Rajwany
Limitless Mobile, LLC
2574 Interstate Drive
Harrisburg, PA 17110
amir.rajwany@limitlessmobile.com

Howard Shapiro
Womble Bond Dickinson (US) LLP
1200 19th St., N.W., Suite 500
Washington, DC 20036
howard.shapiro@wbd-us.com

⁷ *Id.*

⁸ *Id.*