

DUPLICATE

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

1200 19TH STREET, N.W.

SUITE 500

WASHINGTON, D.C. 20036

(202) 955-9600

NEW YORK, NY
TYSONS CORNER, VA
CHICAGO, IL
STAMFORD, CT
PARSIPPANY, NJ
BRUSSELS, BELGIUM
AFFILIATE OFFICES
JAKARTA, INDONESIA
MUMBAI, INDIA

FACSIMILE
(202) 955-9792
www.kelleydrye.com

RANDALL W. SIFERS
DIRECT LINE: (202) 955-9606
EMAIL: rsifers@kelleydrye.com

January 11, 2006

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Federal Communications Commission
Office of Secretary

BY HAND DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20054

Re: VSNL America, Inc., File No. ITC-214-20030728-00376;
VSNL Telecommunications (US) Inc., File Nos. SCL-ASG-20050304-
00003, SCL-T/C-20050304-00005

Dear Ms. Dortch:

On behalf of VSNL America, Inc. ("VSNL America") and VSNL Telecommunications (US) Inc. ("VSNL US"), this letter reports to the Commission that the Agreement among VSNL America, VSNL US, and Videsh Sanchar Nigam Limited ("VSNL"), the U.S. Department of Justice ("DoJ"), including the Federal Bureau of Investigation ("FBI"), the U.S. Department of Homeland Security ("DHS"), and the U.S. Department of Defense ("DoD"), dated April 7, 2005 (the "Second NSA"), has been revised by an amendment dated December 12, 2005 (the "Amendment").

Background. On August 26, 2004, the Chief of the International Bureau released an Order, Authorization and Certificate granting with conditions the Section 214 application filed by VSNL America in File No. ITC-214-20030728-00376. The Section 214 authorization was made subject to compliance with the national security agreement signed by VSNL America, VSNL, the FBI, DoJ, and DHS (the "First NSA"). Section 8.6 of the First NSA provided that "[a]ny substantial modification of this Agreement shall be reported to the FCC within thirty (30) days after approval in writing by the Parties." On April 7, 2005, VSNL America, VSNL, the FBI, DoJ, DHS and DoD, entered into a second national security agreement (the "Second NSA"). Section 8.6 of the Second NSA provides that the agreement supersedes the First NSA, and that "[a]ny substantial modification to this Agreement shall be reported to the FCC within thirty (30) days after approval in writing by the Parties." The parties to the Second NSA jointly

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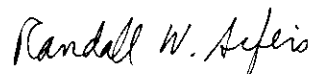
submitted the Second NSA to the Commission on April 11, 2005 in File Nos. SCL-ASG-20050304-00003 and SCL-T/C-20050304-00005 (the "Teleglobe applications"). On December 12, 2005, the Second NSA parties entered into an agreement that amended the Second NSA (the "Amendment"). The Amendment was submitted to the Commission on December 13, 2005 in File Nos. ITC-T/C-20051213-00503 and SCL-T/C-20051213-00030. As referenced in Exhibit C to the Amendment, VSNL American and VSNL US accept that the grant of the Teleglobe applications be conditioned on compliance with the Second NSA, as amended. A copy of the Amendment is attached.

* * *

While VSNL America and VSNL US believe that the December 13, 2005 filing fulfills the reporting requirement in Section 8.6 of the Second NSA, this letter is submitted to ensure that the record in the above referenced proceeding reflects that a timely report was made to the Commission. VSNL America and VSNL US hereby request that the NSA compliance condition in the authorizations in the above-referenced proceedings, be modified to refer to the Second NSA, as amended. Please direct any questions or inquiries to the undersigned attorney.

Respectfully submitted,

Kelley Drye & Warren LLP



Robert J. Aamoth
Randall W. Sifers

Enclosure

cc: James Ball
Renee Crittendon
David Krech
George Li
Susan O'Connell