

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

In the Matter of)	GN Docket 20-109;
)	ITC-214-20010613-00346;
China Telecom (Americas))	ITC-214-20020716-00371;
Corporation)	ITC-T/C-20070725-00285

MOTION FOR EXTENSION OF TIME

China Telecom (Americas) Corporation (“CTA”), by its undersigned counsel and pursuant to 47 C.F.R. § 1.46, hereby moves for an extension of the time for its response to the Order to Show Cause (DA-20-448), issued April 24, 2020, for an additional 30 days, to June 23, 2020. In support of this Motion, CTA states as follows:

1. On Friday, April 24, 2020, the Chiefs of the Enforcement, International, and Wireline Competition Bureaus jointly issued the Order to Show Cause (“Order”), directing CTA to “show cause why the Commission should not initiate a proceeding to revoke and terminate [CTA’s] domestic and international section 214 authorizations issued pursuant to section 214 of the Communications Act of 1934, as amended (Act) and to reclaim [CTA’s] International Signaling Point Codes (ISPCs)” (Order, para. 1.)

2. The Order requires that CTA “shall file a response with the Bureaus within thirty (30) calendar days demonstrating why the Commission should not initiate a proceeding to revoke and terminate its domestic and international section 214 authorizations and explaining why the Commission should not reclaim [its] ISPCs.” It then provides a list of 16 specific items that CTA should include in its response, some of which are quite

extensive, some of which request information about CTA's corporate parent entity, and some of which may affect the interests of third parties. (Order, para. 12.)

3. CTA is a Delaware corporation with its principal place of business in Herndon, Virginia. Its direct corporate parent, China Telecom Corporation Limited (CTCL), is a publicly-traded corporation incorporated in the People's Republic of China. (Order, para 6.)

4. The information requested in paragraph 12 of the Order is both broad in scope and detail, requiring extensive descriptions of CTA's management, services, network facilities, and customers, among other things. CTA will need to interview a large number of employees and executives to provide a response to these questions. The responses will require extensive review to identify any potentially privileged information, as well as business confidential information that may affect the privacy interests of customers, equipment vendors, interconnecting carriers, and other third parties (*see* Order, para. 13). In some cases, the scope of the information required to respond to the questions is unclear, and CTA intends to seek clarification of these requests from the Bureau Chiefs.

5. It will be necessary for CTA to communicate with employees of CTCL based in China, to prepare and to review its response to some of the questions in the Order. This will require translation of extensive documentary materials from English to Chinese, and vice-versa, which will be time-consuming, and further delayed due to the 12-hour time difference between Herndon, Virginia, and the People's Republic of China.

6. Thus, even in normal times, it likely would be extremely difficult if not impossible to complete a response to all of the Bureaus' questions within 30 calendar days.

These difficulties are compounded by the COVID-19 pandemic, which is affecting China as well as the United States. Many of the persons who will be involved in preparing responses to the Order are working from home, and coordination among all these individuals will be even more complex than usual as a result. To be clear, CTA intends to move forward as quickly as possible to compile the information requested in the Order even while many of its employees are working from home, but it anticipates that this process will likely take longer than it otherwise would.

7. For the foregoing reasons, CTA requests that the Commission extend the time for its response to the Order by an additional 30 days, to June 23, 2020 (which is 60 calendar days after the release of the Order); or, if for any reason this is not possible, then for at least 15 days, to June 8. CTA submits that this extension is reasonable and justified by the significant challenges it faces in compiling the extensive information requested by the Bureaus, and that this relatively brief delay will not cause prejudice to any person.

WHEREFORE, CTA requests that the Commission grant this motion and extend the time for its response to the Order to Show Cause to June 23, 2020.

Respectfully submitted,

/s/ Andrew D. Lipman

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