

August 18, 2016

VIA ELECTRONIC DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

**Re: Notice of Proposed Rulemaking
IB Docket No. 16-155**

Dear Ms. Dortch:

The Federal Communications Commission (“FCC” or “Commission”) has issued a Notice of Proposed Rulemaking that seeks comment on proposals to expedite Executive Branch review of applications that involve foreign ownership (“Team Telecom review”). We applaud the FCC for initiating further reform of the Team Telecom review process. Based on our extensive experience representing telecommunications companies before national and international regulators across the globe, including Team Telecom, we submit for the Commission’s consideration the enclosed report, entitled “A Comparative Analysis of Team Telecom Review.”

Our report finds that (a) Team Telecom review is not required by statute; (b) Team Telecom review is costly, lengthy, opaque, and invasive; (c) the burdens associated with Team Telecom review are unnecessary to the extent that a deal involving foreign investment undergoes review by the Committee on Foreign Investment in the United States (“CFIUS”); and (d) there is generally no analogue to Team Telecom review in European countries. The report concludes that instead of attempting to streamline the Team Telecom process, the public interest would be better served by eliminating it altogether when a transaction undergoes CFIUS review. Such action would better promote foreign investment in the U.S. telecommunications sector and minimize delay while ensuring robust scrutiny of national-security and law-enforcement concerns and aligning the U.S. foreign ownership review processes with those generally applicable in Europe.

Please do not hesitate to contact me directly with any questions.

Sincerely,

/s/ Ari Q. Fitzgerald

Ari Q. Fitzgerald

Enclosure