

SAMIR M. ISLAM
Associate
(612) 492-6185
Islam.samir@dorsey.com

August 15, 2016

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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Attn: Gregory Kwan
Competition Policy Division
Wireline Competition Bureau

Re: **WC Docket No. 16-11**
Sangoma U.S., Inc. Third Request for Extension of Domestic Special Temporary Authority

Dear Ms. Dortch:

Sangoma U.S., Inc. ("Sangoma U.S."), by its undersigned counsel, hereby requests a third 60-day extension of the domestic Special Temporary Authority ("STA") granted by Commission staff on February 18, 2016 to continue to provide service to its customers pending consideration of and final FCC action on a previously filed domestic Section 214 authorization application.¹

Sangoma submits that good cause exists for extending the domestic STA a third time because the U.S. Department of Justice ("DOJ"), U.S. Department of Defense ("DOD"), and U.S. Department of Homeland Security ("DHS") (i.e., the Executive Branch Agencies participating in a working group informally known as "Team Telecom") have intervened and asked Commission staff to defer action on this proceeding until Team Telecom completes its

¹ See Sangoma U.S. Inc. Request for Domestic Section 214 Transfers of Control Authority and International and Domestic Special Temporary Authority, WC Docket No. 16-11 and IBFS File No. ITC-214-20150918-00222 (filed Dec. 23, 2015); Supplement to Sangoma U.S., Inc.'s Request for Domestic Section 214 Transfers of Control Authority and International and Domestic Special Temporary Authority, WC Docket No. 16-11 and IBFS File No. ITC-214-20150918-00222 (filed Jan. 19, 2016).

Sangoma U.S. has twice previously filed for a 60-day extension of the STA granted by the Commission on February 18, 2016. The first request for extension was filed on April 15, 2016 and was granted by the Commission on April 18, 2016. The second request for extension was filed June 15, 2016 and granted June 17, 2016.

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Competition Policy Division
Wireline Competition Bureau

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review of any national security, law enforcement, and public safety issues potentially associated with this matter.² That review remains ongoing.

Grant of the instant domestic STA extension request will serve the public interest by ensuring no interruption of service, no inconvenience to customers, and no reduction of the availability of services to Sangoma U.S.'s customers. Some of these services are unique capabilities that allow remote locations, in some cases offshore oil rigs, to communicate almost exclusively within the United States.

Sangoma U.S. acknowledges that a grant of this domestic STA extension request will not prejudice any action the FCC may take on the underlying domestic Section 214 application. Sangoma U.S. further acknowledges that, once granted, the domestic STA can be revoked by the FCC upon its own motion and without a hearing.

For the foregoing reasons, Sangoma U.S. respectfully requests that the FCC grant the third domestic STA extension for a period of 60 days. Sangoma U.S. will seek another extension of the STA period should the FCC require more than the additional 60-day period to take dispositive action on the underlying application for domestic Section 214 authorization.

Please do not hesitate to contact us if you require additional information.

Respectfully submitted,



Samir M. Islam, Dorsey & Whitney LLP
George. M. Foote, Dorsey & Whitney LLP
Erica R. Larson, Dorsey & Whitney LLP

Attorneys for Sangoma U.S., Inc.

cc: Adrienne McNeil, FCC International Bureau Policy Division
David Moore, CFO, Sangoma U.S., Inc.
Philippe Lindheimer, Manager of Software Development, Sangoma U.S., Inc.
Tony Lewis, General Manager, Sangoma U.S., Inc.
Samantha Maqueo, Consultant, GSAssociates

² See Letter from B. Paz, United States Department of Justice, National Security Division, to M. Dortch, Secretary, Federal Communications Commission (filed Mar. 8, 2016).