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Competition Policy Division
Wireline Competition Bureau

For sixty (60) days

October 20, 2016

By Electronic Filing

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. Fourth 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 fourth 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 fourth 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 previously filed for a 60-day extension of the STA granted by the Commission on February 18, 2016 three times. 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. The third request for extension was filed on August 15, 2016 and was granted on August 22, 2016.

review of any national security, law enforcement, and public safety issues potentially associated with this matter.[2] That review remains ongoing in the domestic docket only. It is important to note that Applicant's application for International Section 214 authority was cleared by Team Telecom on September 29, 2016 and the FCC IB granted authority for an international section 214 authorization on September 29, 2016. As of this filing, Team Telecom has not cleared Applicant's *domestic* Section 214 Transfer of Control application.

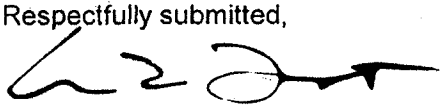
Grant of the instant domestic STA extension request will serve the public interest by ensuring no interruption of service, no inconvenience to customers, and no reduction of the availability of services to Sangoma U.S.'s customers. Some of these services are unique capabilities that allow remote locations, 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 fourth 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,



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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).