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April 15, 2016

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

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APR 18 2016

Competition Policy Division
Wireline Competition Bureau

for 60 days
[Signature]

Attn: Gregory Kwan
Competition Policy Division
Wireline Competition Bureau

Re: **WC Docket No. 16-11**
Sangoma U.S., Inc. 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 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 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 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

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).

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).

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allow remote locations, in some cases offshore oil rigs, to communicate almost exclusively within the United States.

In addition, granting Sangoma U.S.'s STA extension request is consistent with Commission precedent.³ The Commission does not typically deny STAs where they are the result of unintentional error, especially where such denial would mean disruption in valuable services provided to the public. Rather, the FCC has granted such requests even in cases where previously undisclosed foreign ownership amounted to control of the licensee.⁴

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 requested 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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³ See, e.g., Diller Telephone Co., Request for Domestic Section 214 Special Temporary Authority, WC Docket No. 14-224 (filed Nov. 20, 2014) (stamped with WCB grant of authority) ("Diller Domestic Request"). This application was granted three years after Diller acquired Diode and failed to seek authorization for the transfer or notify the Commission. See Diller Domestic Request at 1-2 (underlying transactions took place in March, 2011).

⁴ See Public Notice, DA 12-543, at 3 (FCC IB rel. Apr. 5, 2012) (granting application for assignment to One World Telecom, LLC under IBFS File No. ITC-ASG-20110812-00261); One World Telecom, LLC, Request for Special Temporary Authority (Domestic, WC Docket No. 12-65 (filed Mar. 15, 2012) (stamped with WCB grant of authority); see also Public Notice, DA 12-1842, at 3 (FCC IB rel. Nov. 15, 2012) (approving increased foreign investment transferring control of Verscom LLC under IBFS File No. ITC-T/C-20120203-00040); Public Notice, Authorizations Granted, DA 07-3472, 22 FCC Rcd 13894 (FCC IB rel. July 30, 2007) (granting applications of Satamatics, Inc., Satamatics Worldwide Limited, and Satamatics Global Limited for consent to transfer control of licensees and authorizations, including a Section 214 authorization under IBFS File No. ITC-T/C-20070319-00113).

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