

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In re the Application of)
ERS USA INC.)
For Certification as a VRS and) No. _____
IP Relay Service Provider)
)

To: Disability Rights Office
Attention: Consumer & Governmental Affairs Bureau

**ADDENDUM TO
VRS AND IP RELAY CERTIFICATION APPLICATION**

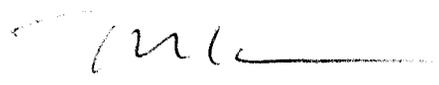
ERS USA Inc. (“ERS”), by its undersigned counsel, Thomas Lynch & Associates, hereby submits the following responses to the supplemental questions presented by the Disability Rights Office of the Consumer and Governmental Affairs Bureau in a letter dated October 2, 2008.

1. The additional information requested pertaining to the VRS service offered by ERS is set forth in Exhibit 1.
2. The additional information requested pertaining to the IP Relay service offered by ERS is set forth in Exhibit 2.
3. A copy of ERS’s International Section 214 Authorization from the International Bureau is set forth as Exhibit 3.
4. ERS hereby acknowledges that ERS will comply with the Commission’s Order dated June 24, 2008, that requires the implementation of a new numbering and emergency call handling plan by December 31, 2008, for VRS and IP Relay Services.

5. A written confirmation of the accuracy of this filing, signed by Marcus Turley, the President and CEO of ERS, is set forth as Exhibit 4.

Respectfully submitted,

ERS USA INC.

By: 

Thomas M. Lynch, Esq.

Thomas Lynch & Associates
705 Melvin Avenue, Suit 104
Annapolis, Maryland 21401
(410) 349-4990

Its attorneys

Dated: October 22, 2008

EXHIBIT 1

QUESTIONS RELATING TO VRS

(1) a description of the VRS service to be provided (e.g., location of facilities and offices, corporate structure, names of corporate executives, and probable date of when the service will be offered);

At the present time, we do not provide a VRS service in the United States but this is being considered for launch in Summer 2009. The service will be provided in American Sign Language in both English and Spanish spoken languages and will be available across the United States of America to balance the availability of sign language interpreters in the communities. We are looking into tap into unused and oft ignored workforce by offering the flexibility of telework to our sign language interpreters, permitting them to work from their home. For example, this gives more flexibility to parents and people who find travel to an office environment difficult.

The location of our recruitment and customer services center is based at ERS USA Inc, Suite 433, 3422 Old Capitol Trail, DE 19808 United States. Marcus Turley is the CEO and President of ERS USA Inc and he will oversee the daily operation in the United States with the support of his team. Once we expand into VRS, ERS USA Inc will recruit Interpreters with outstanding background experience to ensure the smooth running of the VRS operation.

(2) a description of how the VRS provider will meet the following requirements:

- § 64.604(a)(1) Communication Assistant
- § 64.604(a)(2) Confidentiality and conversation content
- § 64.604(a)(3) Type of Calls
- § 64.604(b)(2) Speed of Answer
- § 64.604(b)(4) TRS Facilities
- § 64.604(c)(2) Consumer Compliant Logs
- § 64.604(c)(3) Public Access to Information
- § 64.604(c)(5) Jurisdictional Separation of Costs (Administrative Issues)
- § 64.604(c)(6) Consumer Complaint Resolution
- § 64.605(g) Annual Compliance Report;

Replies below:-

64.604 [A] 1 Communication Assistant

[i] We, as a Deaf managed Company, are ensuring that all Communication Assistants are fully qualified in American Sign Language and fully trained in understanding Deaf culture, Deaf language and Deaf knowledge before taking up full time employment with the ERS Group.

[ii] Not applicable for VRS.

[iii] Not applicable for VRS.

[iv] We will only employ VRS Communication Assistants fluent in American Sign Language with an excellent linguistic background and excellent English or Spanish language qualifications. As stated in [i] they must pass tests to understand Deaf culture, its own language and knowledge of how can we help our Deaf customers to video relay their calls through us smoothly using processes such as 'ERS Operator Assistance'. 'ERS Operator Assistance' gives the user the option to ask the Communication Assistant to provide additional assistance where the user can choose to provide certain additional information about the purpose of their call prior to relay so that the Communication Assistant has all the details to hand (reference numbers, department the user wishes to speak with, names and addresses etc.) and can make sure that the call is processed as smoothly and quickly as possible.

[v] We can confirm that we will comply with the Commission's rule regarding CAs staying with a call for a minimum of 10 minutes.

[vi] We provide options to allow users to choose the gender of their CA and if a call is transferred to another CA then it will be the same gender wherever possible.

[vii] Not applicable for VRS.

64.604 [A] 2 Confidentiality and conversation content

[i] We have the strongest possible policy in place to make sure all of the calls are confidential. Before any VRS CA takes up employment with us, we require them to sign a Confidentiality Agreement. This has always been the policy at ERS since the company began.

[ii] Our future Interpreters will be trained to just video relay the call unless the User specifically states otherwise. We include the background noises, emotional sounds, regional accent and sound effects in sign language, wherever possible, to make sure that the user is aware of what the hearing person is experiencing or expressing during the call. It is all about treating our customers with equality. As a Deaf managed

Company, our CEO has always campaigned for a better access to communication needs and experiencing the 'entire' call is a high priority.

As previously stated, we provide a service called ERS Operator Assistance, allowing the users to provide the CA with prepared information or to ask the Operator for assistance but it is entirely up to the user to request this service.

64.604 [A] 3 Type of Calls

[i] The users have ownership of the call and we do not have any policy or controls in place to refuse or restrict the user's calls in any way.

[ii] We provide the telecommunication services and our users have access to it anytime they wish to make a phone call and we will not block them.

[iii] We understand that we are permitted to decline to complete the User's call if credit authorization is denied.

[iv] We confirm that our users have access to pay-per-call calls.

[v] We do provide the following:

(1) Text to Voice Service and Voice to Text Service.

(2) VCO Service

(3) HCO Service

[vi] We do provide the following:

(1) Call Release Functionality

(2) Speed Dialing

(3) Three way call functionality

[vii] Our Interpreters will be trained to explain the terms such as voicemail in sign language and ask for a message to be left.

[viii] Our Interpreters will be trained to carry out voicemail retrieval or answering machine retrieval in ASL.

64.604 [B] 2 Speed of Answer

[i] We will ensure that Interpreters answer the call within 120 seconds as required by the January 2007 ruling. However, we believe that calls should be answered within 10

seconds to provide the highest standard of services because we don't like to think of our clients being frustrated by a long wait.

64.604 [B] 4 TRS Facilities

[i] We are available 24 hours/7 days.

[ii] Our call centres have emergency power in place to switch over.

64.604 [C] Functional Standards – (1) Consumer Complaints Log

[i] We have a system in place that meets the FCC requirements to handle complaints and said system allows us to process the complaints in a timely manner until they are resolved and being available for review after they have been resolved.

[ii] We will ensure that our system complaints logs are passed to the FCC through our lawyers at year end, May 31st.

64.604 [C] Functional Standards – (2) Contact Persons

[i] ERS USA Inc, Suite #433, 3422 Old Capitol Trail, Wilmington, DE 19808

[ii] Voice – 877-ERS-USoA [377-8762], Fax – 302-256-5003, TTY – 302-256-5004, Customer.Services@ers-usoa.com, AIM [America online instant messaging] – ERSRelay and ask for Help or use our software to communicate with any of our Deaf customer care officers in ASL.

[iii] ERS USA Inc, Correspondence Centre, Suite 433, 3422 Old Capitol Trail, Wilmington, DE 19808.

64.604 [C] 3 Public Access to Information

We will ensure that our contact details and services are advertised in telephone directories and publicized in the media and with all applicable organizations to show the availability and capability of the service to as wide a segment of the population as possible.

64.604 [C] 5 Jurisdictional Separation of costs [Administrative Issues]

We will separate intrastate costs and interstate costs of providing TRS in accordance with the Commission's Rules.

Data Collection from TRS Providers

We shall provide the administrator with true and adequate data necessary to determine the TRS fund revenue requirements and payments. We shall provide the administrator with the following total TRS minutes of use, total TRS operating expenses and total TRS

investment in general accordance with part 32 of the Communication Act and other historical or projected information reasonably requested by the administrator for purpose of computing payments and revenues requirements. The administrator and the Commission shall have the authority to examine, verify and audit data received from us as necessary to assure the accuracy and integrity of fund payments.

64.604 [C] 6 Consumer Complaints Resolution

We have reviewed the Commission's rules regarding Consumer complaints and will comply with them. Additional information about our complaint procedure is provided below.

64.605 [G] Annual Compliance Report

We will comply with the Commission's requirement to file an Annual Compliance Report demonstrating compliance with Section 64.604 of the Rules. We request that the Disability Rights Office provide a copy of any form used for such report, or a redacted version of another carrier's filing that was accepted by the Commission so we can ensure total compliance with the requirement.

(3) a description of the VRS provider's procedures for ensuring compliance with all applicable TRS rules;

We have been aware of and are complying with all appliance TRS rules. We monitor the TRS rules regularly, and our attorney monitors the Commission's Daily Digest for changes in the rules.

(4) a description of the VRS provider's complaint procedures.

Our ERS Support Centre is available from our website to both registered users and visitors to the site. Our complaint procedures are clearly set out for customers and users within that Centre and are set out below for you:-

a) How to Complain.

We really value your feedback. Letting us know when you are not happy with our service gives us the opportunity to put matters right for you and improve our service for everybody.

To help us investigate and resolve your complaint, we'll need the following information:

- * your name and address
- * your ERS Username (for confidentiality reasons, only send your ERS Username in an email)
- * a daytime telephone number or mobile number if you prefer SMS and any times you would prefer us to contact you
- * details of what you are concerned about, including references and copies of any relevant letters and emails.

You can share your complaint with any of our helpful ERS Specialists:-

Telephone us anytime 24/7

ERS USA - 877-ERS-USoA (877-377-8762 - TOLL FREE)

Contact us by mail.

ERS USA Complaint Team
3422 Old Capitol Trail
Suite #433
Wilmington
DE 19808
United States of America

You can go to [ERS Postal Services](#), to send us a letter for free in the post.

Communication with us via email.

Click on '[Submit a ticket here](#)' or above.

b) How we'll respond.

Getting back to you.

Once you've contacted us, we'll do our best to resolve any complaints immediately. If we need more time to complete our investigations, we will:

- * Let you know who will be looking after your complaint.
- * Provide you with a reference number.

* Keep you regularly updated with our progress.

If it looks like our investigations will take more than eight weeks from when you originally contact us, we will provide you with a written update on our progress.

If you're still not happy.

If for any reason you are not happy with our response, please let the person or team who handled your complaint know so that we have the opportunity to see if there is anything further we can do.

Once we're satisfied we've considered all aspects of your complaint, your case will then be passed onto the ETT Group for their final response.

c) I am a customer of ERS USA Inc and my complaint has not been resolved.

If your concerns are not adequately addressed by ERS USA Inc, you have the right to file a complaint with the Federal Communications Commission pursuant to Section 47 CFR §64.604(c)(6)(v). ERS will respond to any such complaints as required by the FCC's Rules.

In addition, ERS USA must provide a copy of the license referenced in the application that demonstrates its status as a common carrier. Finally, ERS USA must include an acknowledgement that ERS USA will comply with the Commission's June 24, 2008, Order that requires the implementation of new numbering and emergency call handling plan by December 31, 2008, for VRS and IP Relay services.
--

Attached as Exhibit 3 is a copy of the license referred to in our application demonstrating our status as a common carrier.

We can confirm that we will comply with the Commission's June 24 2008 Order regarding the implementation of new numbering and emergency call handling plan by December 31 2008 for both VRS and IP Relay services. We already have in place our own numbering policy which allows users to obtain phone numbers with local area codes and clients can receive incoming calls via their own phone line. We have provided this service to our EU customers for some two years now.

We will comply with the emergency call handling by giving the user access to an emergency button which will connect direct to a free CA. If there is no free CA available, the emergency call will take precedence and the existing non-emergency call will be transferred to another CA and situation explained to the non-emergency user and Receiving Party. We believe that our system is unique!

EXHIBIT 2

QUESTIONS RELATING TO IP RELAY

(1) a description of the IP Relay service to be provided, including clarification of ERS USA's statement in its application that ERS USA currently provides IP Relay in the United States and through an affiliated entity in Europe (include names of such entities and source of compensation for IP Relay);

(1) We currently provide ERS USA IP Relay in the United States on a paying basis but this has not attracted anyone to use our services since they can of course use the FCC funded IP Relay Services. Our operation in the EU is called European Relay Services and is being funded by paying customers as the regulation and funding in the EU is completely different from the United States.

(2) a description of how the IP Relay provider will meet the following requirements:

- § 64.604(a)(1) Communication Assistant
- § 64.604(a)(2) Confidentiality and conversation content
- § 64.604(a)(3) Type of Calls
- § 64.604(b)(2) Speed of Answer
- § 64.604(b)(4) TRS Facilities
- § 64.604(c)(2) Consumer Compliant Logs
- § 64.604(c)(3) Public Access to Information
- § 64.604(c)(5) Jurisdictional Separation of Costs (Administrative Issues)
- § 64.604(c)(6) Consumer Complaint Resolution
- § 64.605(g) Annual Compliance Report;

Replies below:-

64.604 [A] 1 Communication Assistant – ERS Relay Services

[i] We, as a Deaf managed Company, are ensuring that all Communication Assistants are fully trained in understanding of Deaf culture, Deaf language and Deaf knowledge before taking up full time employment with the ERS Group.

[ii] We only employ Communication Assistants with good English language qualifications and as stated in [i] that they must pass tests to understand Deaf culture, its own language and knowledge of how can we help our Deaf customers to relay their calls through us smoothly using processes such as 'ERS Operator Assistance'. 'ERS Operator Assistance' gives the user the option to ask the Communication Assistant to

provide additional assistance where the user can choose to provide certain additional information about the purpose of their call prior to relay so that the Communication Assistant has all the details to hand (reference numbers, department the user wishes to speak with, names and addresses etc.) and can make sure that the call is processed as smoothly and quickly as possible.

[iii] As part of our testing policy, we require all newly recruited Communication Assistants to pass a minimum of 60 words per minute by using an audio system and also train in the VCO and HCO system to see the differences. We also provide typing software to polish and continue this training.

[iv] Not applicable for IP Relay Service.

[v] Not applicable for IP Relay Service.

[vi] We provide options to allow users to choose the gender of their CA and if a call is transferred to another CA then it will be the same gender wherever possible.

[vii] We use Flash software which enables the CA to converse with the user in real time and also to allow the user to converse with the hearing callers in real time.

64.604 [A] 2 Confidentiality and conversation content

[i] We have placed the strongest policy in place to make sure all of the calls are confidential. When the call is completed then the conversation screen is automatically wiped clear in real time before the next call comes in. Before any Communication Assistant takes up employment with us, we require them to sign a Confidentiality Agreement. This has always been the policy at ERS since the company began.

[ii] Our Communication Assistants are trained to just relay the call unless the User specifically states otherwise. We include the background noises, emotional sounds, regional accent and sound effects in the relay call wherever possible to make sure that the user is aware of what the hearing person is experiencing or expressing during the call. It is all about treating our customers with equality. As a Deaf managed Company, our CEO has always campaigned for a better access to communication needs and experiencing the 'entire' call is a high priority.

We provide a services called ERS Operator Assistance and it allows the users to provide us the requests or information and we have a policy in place not to interfere unless client ask us to interfere such as to repeat or to tell us what is wrong.

64.604 [A] 3 Type of Calls

[i] The users have ownership of the call and we do not have any policy or controls in place to refuse or restrict the user's calls in any way.

[ii] We provide the telecommunication services and our users have access to it anytime they wish to make a phone call and we will not block them.

[iii] We understand that we are permitted to decline to complete the User's call if credit authorization is denied.

[iv] We confirm that our users have access to pay-per-call calls.

[v] We do provide the following:

(1) Text to Voice Service and Voice to Text Service.

(2) VCO Service

(3) HCO Service

[vi] We do provide the following:

(1) Call Release Functionality

(2) Speed Dialing

(3) Three way call functionality

[vii] Our Communication Assistants are trained to use 'canned messages' where they use shortcut keys to send text to alert users whether it be a voicemail, IVR or other recording or interactive menu.

[viii] Our Communication Assistants are trained to do voicemail retrieval or answering machine retrieval.

64.604 [B] 2 Speed of Answer

[i] We aim to answer all calls within 10 seconds and we ensure that we have enough Communication Assistants to handle calls to meet the response policy.

64.604 [B] 4 TRS Facilities

[i] We are available 24 hours/7 days.

[ii] Our call centres have emergency power in place to switch over.

64.604 [C] Functional Standards – (1) Consumer Complaints Log

[i] We have a system in place that meets the FCC requirements to handle complaints and said system allows us to process the complaints in a timely manner until they are resolved and being available for review after they have been resolved.

[ii] We will ensure that our system complaints logs are passed to the FCC through our lawyers at year end, May 31st.

64.604 [C] Functional Standards – (2) Contact Persons

[i] ERS USA Inc, Suite #433, 3422 Old Capitol Trail, Wilmington, DE 19808

[ii] Voice – 877-ERS-USoA [377-8762], Fax – 302-256-5003, TTY – 302-256-5004, Customer.Services@ers-usoa.com, AIM [America online instant messaging] – ERSRelay and ask for Help

[iii] ERS USA Inc, Correspondence Centre, Suite 433, 3422 Old Capitol Trail, Wilmington, DE 19808.

64.604 [C] 3 Public Access to Information

We will ensure that our contact details and services are advertised in telephone directories and publicized in the media and with all applicable organizations to show the availability and capability of the service to as wide a segment of the population as possible.

64.604 [C] 5 Jurisdictional Separation of costs [Administrative Issues]

We will separate intrastate costs and interstate costs of providing TRS in accordance with the Commission's Rules.

Data Collection from TRS Providers

We shall provide the administrator with true and adequate data necessary to determine the TRS fund revenue requirements and payments. We shall provide the administrator with the following total TRS minutes of use, total TRS operating expenses and total TRS investment in general accordance with part 32 of the Communication Act and other historical or projected information reasonably requested by the administrator for purpose of computing payments and revenues requirements. The administrator and the Commission shall have the authority to examine, verify and audit data received from us as necessary to assure the accuracy and integrity of fund payments.

64.604 [C] 6 Consumer Complaints Resolution

We have reviewed the Commission's rules regarding Consumer complaints and will comply with them. Additional information about our complaint procedure is provided below.

64.605 [G] Annual Compliance Report

We will comply with the Commission's requirement to file an Annual Compliance Report demonstrating compliance with Section 64.604 of the Rules. We request that the Disability Rights Office provide a copy of any form used for such report, or a redacted version of another carrier's filing that was accepted by the Commission so we can ensure total compliance with the requirement.

(3) a description of the IP Relay provider's procedures for ensuring compliance with all applicable TRS rules; and

We have been aware of and are complying with all appliance TRS rules. We monitor the TRS rules regularly, and our attorney monitors the Commission's Daily Digest for changes in the rules.

(4) a description of the IP Relay provider's complaint procedures.

Our ERS Support Centre is available from our website to both registered users and visitors to the site. Our complaint procedures are clearly set out for customers and users within that Centre and are set out below for you:-

a) How to Complain.

We really value your feedback. Letting us know when you are not happy with our service gives us the opportunity to put matters right for you and improve our service for everybody.

To help us investigate and resolve your complaint, we'll need the following information:

- * your name and address
- * your ERS Username (for confidentiality reasons, only send your ERS Username in an email)
- * a daytime telephone number or mobile number if you prefer SMS and any times you would prefer us to contact you
- * details of what you are concerned about, including references and copies of any relevant letters and emails.

You can share your complaint with any of our helpful ERS Specialists:-

Telephone us anytime 24/7

ERS USA - 877-ERS-USoA (877-377-8762 - TOLL FREE)

Contact us by mail.

ERS USA Complaint Team
3422 Old Capitol Trail
Suite #433
Wilmington
DE 19808
United States of America

You can go to [ERS Postal Services](#), to send us a letter for free in the post.

Communication with us via email.

Click on '[Submit a ticket here](#)' or above.

b) How we'll respond.

Getting back to you.

Once you've contacted us, we'll do our best to resolve any complaints immediately. If we need more time to complete our investigations, we will:

- * Let you know who will be looking after your complaint.
- * Provide you with a reference number.
- * Keep you regularly updated with our progress.

If it looks like our investigations will take more than eight weeks from when you originally contact us, we will provide you with a written update on our progress.

If you're still not happy.

If for any reason you are not happy with our response, please let the person or team who handled your complaint know so that we have the opportunity to see if there is anything further we can do.

Once we're satisfied we've considered all aspects of your complaint, your case will then be passed onto the ETT Group for their final response.

c) I am a customer of ERS USA Inc and my complaint has not been resolved.

If your concerns are not adequately addressed by ERS USA Inc, you have the right to file a complaint with the Federal Communications Commission pursuant to Section 47 CFR §64.604(c)(6)(v). ERS will respond to any such complaints as required by the FCC's Rules.

In addition, ERS USA must provide a copy of the license referenced in the application that demonstrates its status as a common carrier. Finally, ERS USA must include an acknowledgement that ERS USA will comply with the Commission's June 24, 2008, Order that requires the implementation of new numbering and emergency call handling plan by December 31, 2008, for VRS and IP Relay services.

Attached as Exhibit 3 is a copy of the license referred to in our application demonstrating our status as a common carrier.

We can confirm that we will comply with the Commission's June 24 2008 Order regarding the implementation of new numbering and emergency call handling plan by December 31 2008 for both VRS and IP Relay services. We already have in place our own numbering policy which allows users to obtain phone numbers with local area codes and clients can receive incoming calls via their own phone line. We have provided this service to our EU customers for some two years now.

We will comply with the emergency call handling by giving the user access to an emergency button which will connect direct to a free CA. If there is no free CA available, the emergency call will take precedence and the existing non-emergency call will be transferred to another CA and situation explained to the non-emergency user and Receiving Party. We believe that our system is unique!

EXHIBIT 3



PUBLIC NOTICE

FEDERAL COMMUNICATIONS COMMISSION
445 12th STREET S.W.
WASHINGTON D.C. 20554

News media information 202-418-0500
Fax-On-Demand 202-418-2830; Internet: <http://www.fcc.gov> (or <ftp.fcc.gov>)
TTY (202) 418-2555

DA No. 08-1947

Report No. TEL-01299

Thursday August 21, 2008

INTERNATIONAL AUTHORIZATIONS GRANTED

Section 214 Applications (47 C.F.R. § 63.18); Section 310(b)(4) Requests

The following applications have been granted pursuant to the Commission's streamlined processing procedures set forth in Section 63.12 of the Commission's rules, 47 C.F.R. § 63.12, other provisions of the Commission's rules, or procedures set forth in an earlier public notice listing applications accepted for filing.

Unless otherwise noted, these grants authorize the applicants (1) to become a facilities-based international common carrier subject to 47 C.F.R. § 63.22; and/or (2) to become a resale-based international common carrier subject to 47 C.F.R. § 63.23; or (3) to exceed the 25 percent foreign ownership benchmark applicable to common carrier radio licensees under 47 U.S.C. § 310(b)(4).

THIS PUBLIC NOTICE SERVES AS EACH NEWLY AUTHORIZED CARRIER'S SECTION 214 CERTIFICATE. It contains general and specific conditions, which are set forth below. Newly authorized carriers should carefully review the terms and conditions of their authorizations. Failure to comply with general or specific conditions of an authorization, or with other relevant Commission rules and policies, could result in fines and forfeitures.

Petitions for reconsideration under Section 1.106 or applications for review under Section 1.115 of the Commission's rules in regard to the grant of any of these applications may be filed within thirty days of this public notice (see Section 1.4(b)(2)).

An updated version of Sections 63.09–.25 of the rules, and other related sections, is available at <http://www.fcc.gov/ib/pd/pf/telecomrules.html>.

For additional information, please contact the FCC Reference and Information Center, Room CY-A257, 445 12th Street SW, Washington, D.C. 20554, (202) 418-0270.

ISP-PDR-20080630-00014

P

Cellco Partnership

Petition for Declaratory Ruling

Grant of Authority

Date of Action: 08/20/2008

Cellco Partnership d/b/a Verizon Wireless (Verizon Wireless or "Petitioner") requests that the Commission extend Verizon Wireless' existing authority to hold interests in common carrier radio licenses under section 310(b)(4) of the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. § 310(b)(4), to encompass: (1) the broadband personal communications service ("PCS") licenses that will be assigned from Vista License Holdings, L.L.C. ("Vista License") to Vista (Mirror 2) PCS License Holding, L.L.C. ("Mirror 2 Sub"), and (2) Mirror 2 Sub, which will be transferred from Valley Communications, LLC to Verizon Wireless. As a result of the proposed transaction, Verizon Wireless will indirectly wholly own Mirror 2 Sub. See ULS File No. 0003461200.

Verizon Wireless is a Delaware general partnership of which 55 percent is indirectly owned by Verizon Communications, Inc. ("Verizon") and the remaining 45 percent is indirectly owned by Vodafone Group Plc ("Vodafone"). Verizon and Vodafone hold their partnership interests in Verizon Wireless through numerous intermediate subsidiaries organized under the laws of Luxembourg, the Netherlands, the United Kingdom, and the United States, all of which are World Trade Organization Member countries. Verizon is a widely held, publicly traded company organized in the United States. Vodafone is a widely held, publicly traded company organized in the United Kingdom.

The International Bureau has previously granted a declaratory ruling approving up to 65.1% indirect foreign ownership of Verizon Wireless by Vodafone. See Applications of Vodafone AirTouch Plc and Bell Atlantic Corporation for Consent to Transfer Control or Assignment of Licenses and Authorizations, Memorandum Opinion and Order, 15 FCC Rcd 16507 (WTB/Int'l Bur. 2000). Petitioner represents no changes have occurred in its foreign ownership since that authorization was granted. Thus, according to Petitioner, the proposed transaction raises no new foreign ownership issues, and the Commission should extend its previous section 310(b)(4) ruling to the subject broadband PCS licenses and to Mirror 2 Sub.

Pursuant to the rules and policies established in the Foreign Participation Order, 12 FCC Rcd 23891 (1997), Order on Reconsideration, 15 FCC Rcd 18158 (2000), we find that the public interest would be served by granting the Petitioner's request. We therefore extend the existing foreign ownership ruling for Cellco Partnership d/b/a Verizon Wireless to cover the subject PCS licenses and Mirror 2 Sub. This authorization is without prejudice to the Commission's action in any other related pending proceedings.

ITC-214-20080724-00344

E

ERS USA Inc.

International Telecommunications Certificate

Service(s): Global or Limited Global Facilities-Based Service, Global or Limited Global Resale Service

Grant of Authority

Date of Action: 08/20/2008

Application for authority to provide facilities-based service in accordance with section 63.18(e)(1) of the Commission's rules, and also to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(1), (2).

ITC-214-20080725-00345

E

East Buchanan Telephone Cooperative

International Telecommunications Certificate

Service(s): Global or Limited Global Resale Service

Grant of Authority

Date of Action: 08/15/2008

Application for authority to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(2).

ITC-214-20080728-00349

E

Farmers Mutual Telephone Company

International Telecommunications Certificate

Service(s): Global or Limited Global Resale Service

Grant of Authority

Date of Action: 08/15/2008

Application for authority to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(2).

ITC-214-20080728-00350

E

Mechanicsville Telephone Co

International Telecommunications Certificate

Service(s): Global or Limited Global Resale Service

Grant of Authority

Date of Action: 08/15/2008

Application for authority to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(2).

ITC-214-20080728-00351

E

Clear Lake Independent Telephone Company

International Telecommunications Certificate

Service(s): Global or Limited Global Resale Service

Grant of Authority

Date of Action: 08/15/2008

Application for authority to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(2).

ITC-214-20080730-00353 E Grand River Mutual Telephone Corp
International Telecommunications Certificate
Service(s): Global or Limited Global Resale Service
Grant of Authority Date of Action: 08/15/2008

Application for authority to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(2).

ITC-214-20080730-00354 E Grand Mound Cooperative Telephone Association
International Telecommunications Certificate
Service(s): Global or Limited Global Resale Service
Grant of Authority Date of Action: 08/15/2008

Application for authority to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(2).

ITC-214-20080730-00355 E Center Junction Telephone Company, Inc.
International Telecommunications Certificate
Service(s): Global or Limited Global Resale Service
Grant of Authority Date of Action: 08/15/2008

Application for authority to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(2).

ITC-214-20080730-00356 E Farmers Cooperative Telephone Company
International Telecommunications Certificate
Service(s): Global or Limited Global Resale Service
Grant of Authority Date of Action: 08/15/2008

Application for authority to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(2).

ITC-214-20080730-00357 E Opencambio.com LLC
International Telecommunications Certificate
Service(s): Global or Limited Global Resale Service
Grant of Authority Date of Action: 08/15/2008

Application for authority to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(2).

ITC-ASG-20080813-00374 E Valley Telephone Cooperative, Inc.
Assignment
Grant of Authority Date of Action: 08/20/2008

Current Licensee: VALLEY TELECOMMUNICATIONS COMPANY
FROM: VALLEY TELECOMMUNICATIONS COMPANY
TO: Valley Telephone Cooperative, Inc.

Notification filed August 13, 2008, of the pro forma assignment of international section 214 authorization, ITC-214-19960730-00353, from Valley Telecommunications Company (Valley) to Valley Telephone Cooperative, Inc. (VTCI) effective June 30, 2006. VTCI is the parent of Valley. This grant is without prejudice to any enforcement action by the Commission for non-compliance with the Communications Act of 1934, as amended, or the Commission's rules.

ITC-T/C-20080326-00155 E Controladora de Servicios de Telecomunicaciones, S.A. de C.V.
Transfer of Control
Grant of Authority Date of Action: 08/20/2008

Current Licensee: Controladora de Servicios de Telecomunicaciones, S.A. de C.V.

FROM: Telefonos de Mexico, S.A.B. de C.V.

TO: Telmex Internacional, S.A.B. de C.V.

Notification filed March 26, 2008, and amended August 6, 2008, of the pro forma transfer of control of international section 214 authorizations, ITC-214-19980813-00564 (Old File No. ITC-98-612) and ITC-214-20000519-00306, held by Controladora de Servicios de Telecomunicaciones, S.A. de C.V. (Consertel), from Telefonos de Mexico, S.A.B. de C.V. (Telmex) to Telemex Internacional, S.A.B. de C.V. (Telmex Internacional), effective February 25, 2008. Pursuant to a corporate reorganization, Telmex transferred 100% of its shares in Consertel to Telemex Internacional. After consummation, Telmex Internacional became Consertel's controlling shareholder. Telmex and Telemex Internacional are both subsidiaries of Carso Global Telecom, S.A.B. de C.V.

Consertel agrees to be classified as dominant on the U.S.-Brazil, U.S.-Dominican Republic, U.S.-El Salvador, U.S.-Guatemala, U.S.-Mexico and U.S.-Nicaragua routes pursuant to section 63.10 of the Commission's rules, 47 C.F.R. § 63.10.

ITC-T/C-20080326-00156 E Telmex USA, L.L.C.
Transfer of Control
Grant of Authority Date of Action: 08/20/2008

Current Licensee: Telmex USA, L.L.C.

FROM: Controladora de Servicios de Telecomunicaciones, S.A. de C.V.

TO: Integracion de Servicios TMX, S.A. de C.V.

Notification filed March 26, 2008, and amended August 6, 2008, of the pro forma transfer of control of international section 214 authorization, ITC-214-20030312-00131, held by Telmex USA, LLC (Telmex USA) from Controladora de Servicios de Telecomunicaciones, S.A. de C.V. (Consertel), to Integracion de Servicios TMX, S.A. de C.V. (Integracion de Servicios TMX), effective March 3, 2008. Pursuant to a corporate reorganization, Consertel transferred 100% of its membership interests in Telmex USA to Integracion de Servicios TMX. After consummation, Integracion de Servicios TMX became Telmex USA's controlling shareholder. Consertel and Integracion de Servicios TMX are both indirect subsidiaries of Carso Global Telecom, S.A.B. de C.V.

Telmex USA agrees to be classified as dominant on the U.S.-Brazil, U.S.-Dominican Republic, U.S.-El Salvador, U.S.-Guatemala, U.S.-Mexico and U.S.-Nicaragua routes pursuant to section 63.10 of the Commission's rules, 47 C.F.R. § 63.10.

ITC-T/C-20080326-00157 E Telmex Holdings, Inc.
Transfer of Control
Grant of Authority Date of Action: 08/20/2008

Current Licensee: Telmex Holdings, Inc.

FROM: Controladora de Servicios de Telecomunicaciones, S.A. de C.V.

TO: Integracion de Servicios TMX, S.A. de C.V.

Notification filed March 26, 2008, and amended August 6, 2008, of the pro forma transfer of control of international section 214 authorization, ITC-214-19970227-00124 (Old File No. ITC-97-127), held by Telmex Holdings, Inc. (Telmex Holdings) from Controladora de Servicios de Telecomunicaciones, S.A. de C.V. (Consertel) to Integracion de Servicios TMX, S.A. de C.V. (Integracion de Servicios TMX) effective March 3, 2008. Pursuant to a corporate reorganization, Consertel transferred 100% of its capital stock interests in Telmex Holdings to Integracion de Servicios TMX. After consummation, Integracion de Servicios TMX became Telmex Holdings' controlling shareholder. Consertel and Integracion de Servicios TMX are both indirect subsidiaries of Carso Global Telecom, S.A.B. de C.V.

Telmex Holdings agrees to be classified as dominant on the U.S.-Brazil, U.S.-Dominican Republic, U.S.-El Salvador, U.S.-Guatemala, U.S.-Mexico and U.S.-Nicaragua routes pursuant to section 63.10 of the Commission's rules, 47 C.F.R. § 63.10.

INFORMATIVE

ITC-214-19960730-00353 Valley Telephone Cooperative, Inc.

By letter filed August 15, 2008, Valley Telephone Cooperative, Inc. notified the Commission that effective July 1, 2006, its wholly-owned subsidiary, Valley Connections, LLC, is providing service under authority of the international section 214 authorization, ITC-214-19960730-00353, held by Valley Telephone Cooperative, Inc. pursuant to section 63.21(h) of the Commission's rules, 47 C.F.R. § 63.21(h).

CONDITIONS APPLICABLE TO INTERNATIONAL SECTION 214 AUTHORIZATIONS

(1) These authorizations are subject to the Exclusion List for International Section 214 Authorizations, which identifies restrictions on providing service to particular countries or using particular facilities. The most recent Exclusion List is attached to this Public Notice. The list applies to all U.S. international carriers, including those that have previously received global or limited global Section 214 authority, whether by Public Notice or specific written order. Carriers are advised that the attached Exclusion List is subject to amendment at any time pursuant to the procedures set forth in Streamlining the International Section 214 Authorization Process and Tariff Requirements, IB Docket No. 95-118, 11 FCC Rcd 12884 (1996), para. 18. A copy of the current Exclusion List will be maintained in the FCC Reference and Information Center and will be available at <http://www.fcc.gov/ib/pd/pf/telecomrules.html#exclusionlist>. It also will be attached to each Public Notice that grants international Section 214 authority.

(2) The export of telecommunications services and related payments to countries that are subject to economic sanctions may be restricted. For information concerning current restrictions, call the Office of Foreign Assets Control, U.S. Department of the Treasury, (202) 622-2520.

(3) Carriers shall comply with the requirements of Section 63.11 of the Commission's rules, which requires notification by, and in certain circumstances prior notification by, U.S. carriers acquiring an affiliation with foreign carriers. A carrier that acquires an affiliation with a foreign carrier will be subject to possible reclassification as a dominant carrier on an affiliated route pursuant to the provisions of Section 63.10 of the rules.

(4) Carriers shall comply with the Commission's International Settlements Policy and associated filing requirements contained in Sections 43.51, 64.1001 and 64.1002 of the Commission's Rules, 47 C.F.R. §§ 43.51, 64.1001, 64.1002. The Commission modified these requirements most recently in International Settlements Policy Reform: International Settlement Rates, First Report and Order, FCC 04-53, 19 FCC Rcd 5709 (2004). In addition, any carrier interconnecting private lines to the U.S. public switched network at its switch, including any switch in which the carrier obtains capacity either through lease or otherwise, shall file annually with the Chief, International Bureau, a certified statement containing, on a country-specific basis, the number and type (e.g., 64 kbps circuits) of private lines interconnected in such manner. The Commission will treat the country of origin information as confidential. Carriers need not file their contracts for interconnection unless the Commission specifically requests. Carriers shall file their annual report on February 1 (covering international private lines interconnected during the preceding January 1 to December 31 period) of each year. International private lines to countries which the Commission has exempted from the International Settlements Policy at any time during a particular reporting period are exempt from this requirement. See 47 C.F.R. § 43.51(d). The Commission's list of U.S. international routes that are exempt from the International Settlements Policy may be viewed at http://www.fcc.gov/ib/pd/pf/isp_exempt.html.

(5) Carriers authorized to provide private line service either on a facilities or resale basis are limited to the provision of such private line service only between the United States and those foreign points covered by their referenced applications for Section 214 authority. A carrier may provide switched services over its authorized resold private lines in the circumstances specified in Section 63.23(d) of the rules, 47 C.F.R. § 63.23(d).

(6) A carrier may engage in "switched hubbing" to countries that do not appear on the Commission's list of U.S. international routes that are exempt from the International Settlements Policy, set forth in Section 64.1002, 47 C.F.R. § 64.1002, provided the carrier complies with the requirements of Section 63.17(b) of the rules, 47 C.F.R. § 63.17(b). The Commission's list of U.S. international routes that are exempt from the International Settlements Policy may be viewed at http://www.fcc.gov/ib/pd/pf/isp_exempt.html.

(7) Carriers shall comply with the "No Special Concessions" rule, Section 63.14, 47 C.F.R. § 63.14.

(8) Carriers regulated as dominant for the provision of a particular communications service on a particular route for any reason other than a foreign carrier affiliation under Section 63.10 of the rules shall file tariffs pursuant to Section 203 of the Communications Act, as amended, 47 U.S.C. § 203, and Part 61 of the Commission's Rules, 47 C.F.R. Part 61. Carriers shall not otherwise file tariffs except as permitted by Section 61.19 of the rules, 47 C.F.R. § 61.19. Except as specified in Section 20.15 with respect to commercial mobile radio service providers, carriers regulated as non-dominant, as defined in Section 61.3, and providing detariffed international services pursuant to Section 61.19, must comply with all applicable public disclosure and maintenance of information requirements in Sections 42.10 and 42.11.

(9) Carriers shall file the annual reports of overseas telecommunications traffic required by Section 43.61(a). Carriers shall also file the quarterly reports required by Section 43.61 in the circumstances specified in paragraphs (b) and (c) of

that Section.

(10) Carriers shall file annual reports of circuit status and/or circuit additions in accordance with the requirements set forth in Rules for Filing of International Circuit Status Reports, CC Docket No. 93-157, Report and Order, 10 FCC Rcd 8605 (1995). See 47 C.F.R. § 43.82. See also §§ 63.22(e), 63.23(e). These requirements apply to facilities-based carriers and private line resellers, respectively. See also <http://www.fcc.gov/ib/pd/pf/csmanual.html>.

(11) Carriers should consult Section 63.19 of the rules when contemplating a discontinuance, reduction or impairment of service. Further, the grant of these applications shall not be construed to include authorization for the transmission of money in connection with the services the applicants have been given authority to provide. The transmission of money is not considered to be a common carrier service.

(12) If any carrier is reselling service obtained pursuant to a contract with another carrier, the services obtained by contract shall be made generally available by the underlying carrier to similarly situated customers at the same terms, conditions and rates. 47 U.S.C. § 203.

(13) To the extent the applicant is, or is affiliated with, an incumbent independent local exchange carrier, as those terms are defined in Section 64.1902 of the rules, it shall provide the authorized services in compliance with the requirements of Section 64.1903.

(14) Except as otherwise ordered by the Commission, a carrier authorized here to provide facilities-based service that (i) is classified as dominant under Section 63.10 of the rules for the provision of such service on a particular route and (ii) is affiliated with a carrier that collects settlement payments for terminating U.S. international switched traffic at the foreign end of that route may not provide facilities-based switched service on that route unless the current rates the affiliate charges U.S. international carriers to terminate traffic are at or below the Commission's relevant benchmark adopted in International Settlement Rates, IB Docket No. 96-261, Report and Order, 12 FCC Rcd 19806 (1997). See also Report and Order on Reconsideration and Order Lifting Stay in IB Docket No. 96-261, FCC 99-124 (rel. June 11, 1999). For the purposes of this rule, "affiliated" and "foreign carrier" are defined in Section 63.09.

Exclusion List for International Section 214 Authorizations

-- Last Modified December 22, 1999 --

The following is a list of countries and facilities not covered by grant of global Section 214 authority under Section 63.18(e)(1) of the Commission's Rules, 47 C.F.R. § 63.18(e)(1). In addition, the facilities listed shall not be used by U.S. carriers authorized under Section 63.18 of the Commission's Rules unless the carrier's Section 214 authorization specifically lists the facility. Carriers desiring to serve countries or use facilities listed as excluded hereon shall file a separate Section 214 application pursuant to Section 63.18(e)(3) of the Commission's Rules. See generally 47 C.F.R. § 63.22.

Countries:

Cuba (Applications for service to Cuba shall comply with the separate filing requirements of the Commission's Public Notice Report No. I-6831, dated July 27, 1993, "FCC to Accept Applications for Service to Cuba.")

Facilities:

All non-U.S.-licensed satellite systems that are not on the Permitted Space Station List, maintained at <http://www.fcc.gov/ib/sd/se/permitted.html>. See International Bureau Public Notice, DA 99-2844 (rel. Dec. 17, 1999).

This list is subject to change by the Commission when the public interest requires. Before amending the list, the Commission will first issue a public notice giving affected parties the opportunity for comment and hearing on the proposed changes. The Commission may then release an order amending the exclusion list. This list also is subject to change upon issuance of an Executive Order. See Streamlining the Section 214 Authorization Process and Tariff Requirements, IB Docket No. 95-118, FCC 96-79, 11 FCC Rcd 12,884, released March 13, 1996 (61 Fed. Reg. 15,724, April 9, 1996). A current version of this list is maintained at <http://www.fcc.gov/ib/pd/pf/telecomrules.html#exclusionlist>.

For additional information, contact the International Bureau's Policy Division, (202) 418-1460.

EXHIBIT 4



Gregory Hlibok
Disability Rights Office
Federal Communications Commission
Washington
DC 20554

ERS USA Inc.
3422 Old Capitol Trail
Suite #433
Wilmington
DE 19808
Telephone: +1 302 256 5004
Fax: +1 302 261 7391

Your Ref:
Our Ref: MT
Date: 21 October 2008

Dear Mr Hlibok

ERS USA Inc.

Please accept this letter as my confirmation that the information contained in the attached Addendum is accurate and true to the best of my knowledge.

Yours sincerely

MARCUS TURLEY
PRESIDENT AND CEO OF ERS USA Inc

ERS USA Inc incorporated in the State of Delaware, USA.

Registered American Office: ERS USA Inc, 3422 Old Capitol Trail, Suite #433, Wilmington, DE 19808.

Federal Communication Commission granted ERS USA Inc an International Telecommunications Certificate to provide a Global or Limited Global Facilities-Based Service and Global or Limited Global Resale Service under issuing number ITC-214-20080724-00544.

