

NOWALSKY, BRONSTON & GOTHARD

A Professional Limited Liability Company

Attorneys at Law

Leon L. Nowalsky
Edward P. Gothard

1420 Veterans Memorial Blvd.
Metairie, Louisiana 70005
Telephone: (504) 832-1984
Facsimile: (504) 831-0892

Philip R. Adams, Jr.
Of Counsel
Benjamin W. Bronston

February 9, 2012

BY ECFS

Federal Communications Commission
Wireline Competition Bureau
9300 E. Hampton Drive
Capitol Heights, MD 20743

RE: Combined application for consent to the transfer of control of a business which has Blanket Domestic Interstate 214 Authority - Transfer of Keywest Communications (USA) Inc. From Key West Global Telecommunications Berhad to Sifa Technology Limited
Docket No. WC-12-7

Dear Sir or Madam:

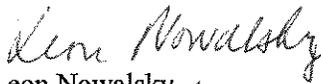
Please find below responses to Staff's question regarding what type of services are provided by KCUSA, interstate or intrastate domestic services.

The language used in the original application concerning providing intrastate and interstate services is technically correct. In the provision of international wholesale services, the international calls originated by the Carrier customers of KCUSA are either routed directly to KCUSA's switch by the Carrier or are picked up by KCUSA at a meet-me point.

In situations where the traffic is picked up by KCUSA at a meet-point in a state other than California and transported to KCUSA's switch in California over KCUSA facilities the resultant transport would be deemed interstate. The same would hold true on an intrastate basis where traffic is originated by the wholesale Carrier customer in California, sent to a meet-point and picked up by KCUSA from the meet-point and transported to KCUSA's switch in California.

Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,


Leon Nowalsky *LN*

Enclosures