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VIA HAND DELIVERY

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

Re: Request for Special Temporary Authority of Min-Su Kang

Dear Ms. Dortch:

Pursuant to section 214(a) of the Communications Act of 1934, as amended,[1] and Section 63.04 of the Commission's rules,[2] Mr. Min-su Kang hereby requests, through the undersigned counsel, Special Temporary Authority ("STA") for a period of 60 days to allow RightLink USA, Inc. ("Licensee") to continue to provide interstate telecommunications services pending Commission action on the application to transfer control of the Licensee to Mr. Kang.

Licensee is a non-dominant telecommunications carrier holding blanket domestic Section 214 authorization from the Commission to provide interstate telecommunications services under Section 63.01 of the Commission's rules,[3] and is a competitive local exchange carrier in Florida with eleven end users. Mr. Kang and the former 100% owner of Licensee, Mr. Michael Ukwendu, signed an agreement on January 18, 2012 to sell 100% of the stock of Licensee to Mr. Kang. Based on representations made by Mr. Ukwendu, Mr. Kang believed that any long distance services, including interstate long distance services, were provided by a separate legal entity, not the Licensee. After investigating the matter, Mr. Kang has learned that there is only one entity associated with Mr. Ukwendu that is registered with the Commission and that entity is the Licensee. Mr. Ukwendu did, however, obtain two FCC Registration Numbers ("FRNs") for RightLink USA, Inc., 0017116849 and 0018621706.[4] Commission staff has orally confirmed that these two FRNs are both associated with the same

[1] 47 U.S.C. § 214(a).

[2] 47 C.F.R. §§ 63.04.

[3] 47 C.F.R. § 63.01.

[4] Licensee only has one FCC Form 499 filer identification number, which is 826862.

federal tax identification number ("TIN").[5] All indications, therefore, are that there is only one legal entity that simply has two FRNs. Unfortunately, prior to discovery of this information by Mr. Kang, Mr. Ukwendu made filings with the Florida Secretary of State indicating that Mr. Kang is the new "CEO" of the Licensee, and indicated that Mr. Kang needed to take over operations of the company including paying a pending invoice to AT&T for wholesale services, and signing an amendment to the company's interconnection agreement with AT&T. Mr. Kang took these actions with the belief that if he did not take such actions, service to the end users may have been interrupted. At the same time, Mr. Ukwendu has not fully extracted himself from the Licensee's relationship with AT&T, leading to confusion on the part of Mr. Kang as to the status of control over the company. Mr. Kang, therefore, has sent a cease and desist letter to Mr. Ukwendu to direct him to stop engaging in any business on behalf of the Licensee and to provide all information and materials necessary for Mr. Kang to manage and control all aspects of the company. The earliest date on which control may be said to have been transferred would be on or about April 20, 2012, which is the date on which the last portion of the purchase price was paid to Mr. Ukwendu. Mr. Kang did not sign the amendment to the interconnection agreement, however, until July 18, 2012.

The parties filed an application to transfer control of the Licensee on September 6, 2012. In light of the foregoing, Mr. Kang, and to the extent he is able to obtain the cooperation of Mr. Ukwendu, will withdraw that application and file a new application that explains the premature closing of this transaction. This new application will be filed as soon as possible.

Mr. Kang acknowledges that grant of the STA request will not prejudice any action the Commission may take on the underlying application for Commission authorization, nor will it preclude any enforcement action. Licensees further acknowledge that the STA may be revoked by the Commission upon its own motion without a hearing. Finally, Mr. Kang commits to complying with the Commission's rules pertaining to Section 214 of the Communications Act.

Sincerely,

Danielle Frappier

[5] Staff confirmed that the last four digits of the TIN are the same for both FRNs and indicated that Commission policy would not permit staff to release the full TIN.