

DOCKET FILE COPY ORIGINAL

ACCEPTED/FILED

SEP 26 2013

Federal Communications Commission  
Office of the Secretary

Jennifer Hindin  
202.719.4975  
jhindin@wileyrein.com

February 5, 2013



1776 K STREET NW  
WASHINGTON, DC 20006  
PHONE 202.719.7000  
FAX 202.719.7049

7925 JONES BRANCH DRIVE  
McLEAN, VA 22102  
PHONE 703.905.2800  
FAX 703.905.2820

www.wileyrein.com

**VIA IBFS**

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

Re: Applications for Assignment of Domestic and International Section 214  
Authorizations and Requests for Special Temporary Authority, File Nos.  
ITC-ASG-20130130-00035, ITC-ASG-20130130-00037, ITC-STA-  
20130130-00036, and ITC-STA-20130130-00038

Dear Ms. Dortch:

Next Angel LLC ("Next Angel"), by counsel, files this letter pursuant to Section 1.65 of the Federal Communications Commission's ("FCC" or "Commission") rules<sup>1</sup> to provide updated information for the above-referenced pending applications for assignment of domestic and international Section 214 authority from STi Prepaid, LLC ("STi Prepaid") and STi Telecom Inc. ("STi Telecom") to Next Angel and for Special Temporary Authority ("STA") to continue providing service to the customers of STi Prepaid and STi Telecom pending approval of the assignment application.

In the pending assignment applications, Next Angel acknowledges that STi Prepaid and STi Telecom are delinquent in certain debts owed to the Commission and seeks waiver of Section 1.1910 of the Commission's rules<sup>2</sup> to allow the FCC to process the applications. Next Angel supplements this waiver request to seek immediate grant of its applications for special temporary authority pursuant to Section 1.1910(c) of the Commission's rules, which states that "[a]pplications for emergency or special temporary authority . . . involving a brief transition period facilitating continuity of service to a substantial number of customers or end users, will not be subject to the provisions of . . . this section."<sup>3</sup> Currently, approximately 20 million calling cards sold by STi Prepaid and STi Telecom remain in the hands of customers who expect the continued ability to place domestic and international

<sup>1</sup> 47 C.F.R. § 1.65.

<sup>2</sup> 47 C.F.R. § 1.1910.

<sup>3</sup> 47 C.F.R. § 1.1910(c).



Ms. Marlene H. Dortch, Secretary  
February 5, 2013  
Page 2

calls using these cards. Although, Next Angel anticipates that the number of cards outstanding is declining as existing card are depleted, there can be no doubt that millions of customers—a “substantial” number—risk disruption of service if the special temporary authorizations are not processed and granted quickly. Because these cards are sold nationwide and, in fact, continue to be sold by STi Prepaid and STi Telecom, there is no means of contacting customers or providing refunds if these cards become non-operational. STi Prepaid and STi Telecom have informed Next Angel that due to financial realities, service to customers may be discontinued by the end of this week and no later than Friday February 15, 2013. Grant of Next Angel’s request for waiver of the redlight rule and for special temporary authority will facilitate continuity of service to these customers.

Next Angel is committed to providing quality service to these existing customers. As part of the Asset Purchase Agreement, Next Angel agreed to assume all of the liabilities of providing continued service to existing customers. As explained in the pending applications, Next Angel was recently formed by three experienced telecommunications companies that have the technical and financial expertise necessary to provide quality and even improved service to customers. Next Angel is aware of the 20 million calling cards outstanding and has all of the operational systems and capabilities necessary to provide uninterrupted service to these customers. Next Angel will provide notification to customers of the change in service provider through a recording that includes a telephone number that can be used to directly contact a Next Angel customer service representative.

Next Angel is aware of STi Prepaid and STi Telecom’s issues with regulatory compliance and is committed to ensuring that these issues do not continue under the management of Next Angel. Next Angel will retain 80 percent of the staff of STi Prepaid and STi Telecom to ensure there is a seamless transition for customers, but new management under Next Angel is committed to compliance with all regulatory requirements. Next Angel employs Matthew Shulman as in house regulatory counsel and has also engaged outside counsel to make staff aware of all regulatory requirements, including all regulatory fee obligations.



Ms. Marlene H. Dortch, Secretary  
February 5, 2013  
Page 3

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

*/s/ Jennifer Hindin*

Jennifer Hindin

cc: David Krech,  
Jodie May  
Tracey Wilson  
Myrva Charles  
Sally Stone