



Federal Communications Commission  
Washington, D.C. 20554

February 1, 2022

DA 22-100

Agustin Rosso  
International Facilities Sub-Director  
Tricom USA, Inc.  
One Exchange Place Suite 400  
Jersey City, NJ 07302

Beatriz Beltranena  
General Counsel  
AMZAK Capital Management, LLC  
980 North Federal Highway, Suite 315  
Boca Raton, FL 33432  
bbeltranena@amzak.com

*Via Certified Mail, Return Receipt Requested, and E-mail*

**Re: Reclamation of Tricom USA, Inc.'s International Signaling Point Codes,  
3-184-0 (New York, NY) and 3-187-3 (Miami, FL)**

Dear Mr. Rosso and Ms. Beltranena:

By this letter, we inform you of our intent to reclaim the above-captioned International Signaling Point Codes (ISPCs) provisionally assigned to Tricom USA, Inc. (Tricom), unless you respond to this letter within thirty (30) days, by **March 3, 2022**, as directed below. It is our understanding that Tricom is no longer a going concern and that neither Tricom nor the company that acquired it—AMZAK Capital Management, LLC (AMZAK)—is using the above-referenced ISPCs. Consequently, we intend to reclaim the ISPCs and make them available for assignment to other operators.

The Federal Communications Commission (Commission), as the Administrator for the United States, assigns ISPCs for Signaling System No. 7 networks under ITU-T Recommendation Q.708.<sup>1</sup> In 2000, the Commission granted Tricom's applications for one ISPC in New York City, NY and one ISPC in Miami, FL, and provisionally assigned it codes 3-184-0 and 3-187-3, respectively.<sup>2</sup> The Commission has explained that ISPCs are a scarce resource and "[a]s a result, code assignments are conditional upon their being used within one year lead time, so that the Commission can reassign unused codes to another

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<sup>1</sup> International Telecommunication Union (ITU), ITU-T Recommendation Q.708 (03/99), Series Q: Switching and Signalling, Specifications of Signalling System No. 7 – Message Transfer Part (MTP), Assignment procedures for international signalling point codes, <https://www.itu.int/rec/recommendation.asp?lang=en&parent=T-REC-Q.708-199903-I> (ITU-T Recommendation Q.708).

<sup>2</sup> Tricom USA, Inc., File No. SPC-NEW-20000113-00005 (filed January 13, 2000) and File No. SPC-NEW-20000712-00039 (July 12, 2000) (Tricom ISPC Applications). *See also* Letter from Cathy Hsu, Policy Division, International Bureau, FCC to Mr. Agustin Rosso, Tricom USA, Inc. (Jan. 31, 2000) (*Tricom 3-184-0 Grant Letter*) and Letter from Cathy Hsu, Policy Division, International Bureau, FCC to Mr. Agustin Rosso, Tricom USA, Inc. (July 13, 2000) (*Tricom 3-187-3 Grant Letter*) (together, *Tricom Grant Letters*).

carrier.”<sup>3</sup> ITU-T Recommendation Q.708 provides that the Commission should withdraw an ISPC assignment if the code is “no longer in use or required” by the operator, among other reasons.<sup>4</sup>

Our research indicates that Tricom is no longer providing telecommunications services. In 2011, the International Bureau granted Tricom’s application for transfer of control of its international section 214 authorizations to AMZAK.<sup>5</sup> That application did not discuss the status of Tricom’s ISPC assignments. Shortly thereafter, the Commission’s Enforcement Bureau adopted a *Consent Decree* entered into between the Commission and Tricom.<sup>6</sup> The *Consent Decree* indicated that Tricom had “surrendered all of its domestic and international authorizations and licenses previously granted by the Commission for the provision of domestic and international telecommunications services. . . [and] ceased all telecommunications operations.”<sup>7</sup> The FCC Form 499 filer database indicates that Tricom went “out of business” by the end of 2010.<sup>8</sup> In March 2021, International Bureau staff sent an email to AMZAK inquiring about the status of Tricom’s two ISPC assignments. An AMZAK representative replied that Tricom had been liquidated and dissolved and that the ISPCs in question are not in use.<sup>9</sup>

For these reasons, we believe that Tricom no longer exists and is no longer providing telecommunications services or using its assigned ISPCs. Consequently, we hereby notify you of our intent to reclaim codes 3-184-0 and 3-187-3 on or after **March 3, 2022**. We will consider failure to respond to this letter by **March 3, 2022** as confirmation that codes 3-184-0 and 3-187-3 are not in use, and we will then reclaim these codes and make them available for re-assignment.

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<sup>3</sup> *Reporting Requirements for U.S. Providers of International Telecommunications Services; Amendment of Part 43 of the Commission’s Rules*, Notice of Proposed Rulemaking, 19 FCC Rcd 6460, 6474, para. 36, n.83 (2004); see also *China Telecom (Americas) Corporation*, GN Docket No. 20-109 *et al.*, Order Instituting Proceedings on Revocation and Termination and Memorandum Opinion and Order, 36 FCC Rcd at 15006, 15040, para. 58 (2020) (“ISPCs are a scarce resource that are used by international Signaling System 7 (SS7) gateways as addresses for routing domestic voice traffic to an international provider and anyone seeking an ISPC assignment is required by rule to file an application with the Commission and comply with its procedures.”).

<sup>4</sup> ITU-T Recommendation Q.708 at 6.

<sup>5</sup> *International Authorizations Granted, Section 214 Applications* (47 C.F.R. § 63.18); *Section 310(b)(4) Requests*, Public Notice, Report No. TEL-01520, 26 FCC Rcd. 13121 (Sept. 22, 2011) (grant of Tricom USA, Inc. application file no. ITC-T/C-20100719-00295 on Sept. 21, 2011).

<sup>6</sup> *Tricom USA, Inc.*, File No.: EB-11-IH-0059, NAL/Acct. No.: 201232080006, Order, 26 FCC Rcd. 16056 (2011) (*Consent Decree*).

<sup>7</sup> *Id.* at 16066. The *Consent Decree* also made no specific mention of Tricom’s ISPC assignments.

<sup>8</sup> FCC Form 499 Filer Database, <https://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=816834> (last visited October 19, 2021).

<sup>9</sup> Emails from Arthur Lechtman, Attorney-Advisor, Telecommunications and Analysis Division, International Bureau to Beatriz Beltranena, AMZAK Capital Management, LLC (bbeltranena@amzak.com) (March 16, 2021, 8:44 AM and 10:04 AM); Return emails from Beatriz Beltranena, AMZAK Capital Management, LLC to Arthur Lechtman, Attorney-Advisor, Telecommunications and Analysis Division, International Bureau (March 16, 2021, 11:11 AM and 12:19 PM). These emails are reprinted in the Attachment below.

If you have any questions or concerns regarding this matter, please contact me at (202) 418-0574 or [Francis.Gutierrez@fcc.gov](mailto:Francis.Gutierrez@fcc.gov) or Arthur Lechtman at (202) 418-1465 or [Arthur.Lechtman@fcc.gov](mailto:Arthur.Lechtman@fcc.gov).

Sincerely,

*/Francis Gutierrez/*

Francis Gutierrez  
Deputy Chief, Telecommunications and Analysis  
Division  
International Bureau

cc:

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## Attachment

**From:** Beatriz Beltranena <[bbeltranena@amzak.com](mailto:bbeltranena@amzak.com)>  
**Sent:** Tuesday, March 16, 2021 12:19 PM  
**To:** Arthur Lechtman <[Arthur.Lechtman@fcc.gov](mailto:Arthur.Lechtman@fcc.gov)>  
**Cc:** Francis Gutierrez <[Francis.Gutierrez@fcc.gov](mailto:Francis.Gutierrez@fcc.gov)>; Stacey Ashton <[Stacey.Ashton@fcc.gov](mailto:Stacey.Ashton@fcc.gov)>  
**Subject:** RE: Tricom USA, Inc. - international signaling point codes

No we are not in fact in 2014 we sold the Company and all interests in Tricom in the DR.

**Beatriz Beltranena**  
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**From:** Arthur Lechtman <[Arthur.Lechtman@fcc.gov](mailto:Arthur.Lechtman@fcc.gov)>  
**Sent:** Tuesday, March 16, 2021 10:04 AM  
**To:** Beatriz Beltranena <[bbeltranena@amzak.com](mailto:bbeltranena@amzak.com)>  
**Cc:** Francis Gutierrez <[Francis.Gutierrez@fcc.gov](mailto:Francis.Gutierrez@fcc.gov)>; Stacey Ashton <[Stacey.Ashton@fcc.gov](mailto:Stacey.Ashton@fcc.gov)>  
**Subject:** RE: Tricom USA, Inc. - international signaling point codes

Ms. Beltranena-

Thanks for replying. We are aware of the consent decree and the surrender of the international 214 authorizations. Still, there was no specific mention of the final disposition of the ISPCs, which were separately assigned to Tricom. It seems that the ISPCs are no longer in use and were not part of any assignment of customer accounts. As ISPCs are a scarce resource, we reclaim them when they are not being used, or operators return them when they no longer use them. Just to confirm then, Tricom no longer exists, and no successors or assigns of Tricom (or AMZAK) is/are using the referenced ISPCs? Thank you,

Artie Lechtman

Federal Communications Commission  
International Bureau  
202.418.1465

**From:** Beatriz Beltranena <[bbeltranena@amzak.com](mailto:bbeltranena@amzak.com)>  
**Sent:** Tuesday, March 16, 2021 11:11 AM  
**To:** Arthur Lechtman <[Arthur.Lechtman@fcc.gov](mailto:Arthur.Lechtman@fcc.gov)>  
**Cc:** Francis Gutierrez <[Francis.Gutierrez@fcc.gov](mailto:Francis.Gutierrez@fcc.gov)>; Stacey Ashton <[Stacey.Ashton@fcc.gov](mailto:Stacey.Ashton@fcc.gov)>  
**Subject:** RE: Tricom USA, Inc. - international signaling point codes

Mr. Lechtman,  
Hope all is well.  
Tricom USA, Inc. Is an entity that has been liquidated and dissolved.

We obtained the Order from the FCC as attached on December 2011 where we got the consent to the relinquish the use of any access point for submarine cables and all related activity.

Please let me know if you have comments or questions.

Rgds,

BB

**Beatriz Beltranena**

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**From:** Arthur Lechtman <[Arthur.Lechtman@fcc.gov](mailto:Arthur.Lechtman@fcc.gov)>

**Sent:** Tuesday, March 16, 2021 8:44 AM

**To:** Beatriz Beltranena <[bbeltranena@amzak.com](mailto:bbeltranena@amzak.com)>

**Cc:** Francis Gutierrez <[Francis.Gutierrez@fcc.gov](mailto:Francis.Gutierrez@fcc.gov)>; Stacey Ashton <[Stacey.Ashton@fcc.gov](mailto:Stacey.Ashton@fcc.gov)>

**Subject:** Tricom USA, Inc. - international signaling point codes

Hello Ms. Beltranena-

My office in the FCC's International Bureau is reviewing international signaling point code (ISPC) records. I am writing to inquire whether Tricom USA, Inc. is still using the two international signaling point codes that it was assigned in 2000:

File no. SPC-NEW-20000113-00005: 3-184-0 (Jersey City, NJ)

File no. SPC-NEW-20000712-00039: 3-187-3 (Miami, FL)

Please let me know the status of these ISPCs by email or call me at the number below if you have any questions. Thank you,

Artie Lechtman

Federal Communications Commission

International Bureau

202.418.1465