

Federal Communications Commission Washington, D.C. 20554

May 23, 2022

DA 22-565

Jeffrey J. Carlisle Counsel for Pacific Networks Corp. and ComNet (USA) LLC Lerman Senter PLLC 2001 L Street NW, Suite 400 Washington, DC 20036 jcarlisle@lermansenter.com

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED AND EMAIL

Re: Reclamation of International Signaling Point Codes 3-191-6 and 3-193-4 (Los Angeles, CA)

Dear Mr. Carlisle:

This letter serves to notify you that, as of the date of this letter and in accordance with the *Pacific Networks/ComNet Order on Revocation and Termination*,¹ we reclaim and make available for reassignment the International Signaling Point Codes (ISPCs) that were provisionally assigned on June 1, 2001 (3-191-6) and June 13, 2003 (3-193-4)² to CM Tel (USA) LLC (CM Tel)—now known as ComNet (USA) LLC (ComNet).³ In the *Pacific Networks/ComNet Order on Revocation and Termination*, the Commission revoked and terminated Pacific Networks Corp.'s (Pacific Networks) and ComNet's section 214 authority given the significant national security and law enforcement concerns and directed them to discontinue any domestic or international services no later than sixty (60) days from the release date of the Order.⁴ The Commission also stated it will reclaim ComNet's ISPCs sixty (60) days from the release date of the Order because "their continued use presents national security and law enforcement risks."⁵

⁴ Pacific Networks/ComNet Order on Revocation and Termination at *1, para. 2.

⁵ *Id.* at *68, para. 157.

¹ Pacific Networks Corp. and ComNet (USA) LLC, GN Docket No. 20-111, File Nos. ITC-214-20090105-00006, ITC-214-20090424-00199, Order on Revocation and Termination, FCC 22-22, 2022 WL 905270, at *68, para. 157 (rel. Mar. 23, 2022) (*Pacific Networks/ComNet Order on Revocation and Termination*); see also International Telecommunication Union, 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, <u>https://www.itu.int/rec/recommendation.asp?lang=en&parent=T-REC-Q.708-199903-I</u> (ITU-T Recommendation Q.708).

² CM Tel (USA) LLC, File No. SPC-NEW-20010528-00019 (ISPC 3-191-6) (2001 ISPC Application); CM Tel (USA) LLC, File No. SPC-NEW-20030529-00021 (ISPC 3-193-4) (2003 ISPC Application); Letter from Cathy Hsu, Policy Division, FCC International Bureau, to Rob Leon, Senior Technical Manager, CM Tel (USA) (June 13, 2003) (on file in SPC-NEW-20030529-00021) (2003 Assignment Letter).

³ On March 25, 2010, the International Bureau issued a Public Notice of CM Tel's name change to ComNet. *International Authorizations Granted*; *Section 214 Applications (47 C.F.R. § 63.18)*; *Section 310(b)(4) Requests*, File No. ITC-214-20090424-00199, Public Notice, 25 FCC Rcd 2838, 2841-42 (IB 2010); *see also* International Telecommunication Union, List of International Signalling Point Codes (ISPC) (According to Recommendation ITU-T Q.708 (03/99)) (July 1, 2020), <u>https://www.itu.int/dms_pub/itu-t/opb/sp/T-SP-Q.708B-2020-PDF-E.pdf</u> (listing ComNet's ISPCs under the name ComNet (USA) LLC).

Accordingly, we reclaim ISPCs 3-191-6 (Los Angeles, CA) and 3-193-4 (Los Angeles, CA) as of the date of this letter and make them immediately available for reassignment. If you have any questions please contact me at <u>Denise.Coca@fcc.gov</u> or (202) 418-0574.

Sincerely,

/<u>Denise Coca</u>/ Chief, Telecommunications and Analysis Division International Bureau

cc:

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