



Federal Communications Commission  
Washington, D.C. 20554

November 1, 2023

DA 23-1031

Mr. Carlos Cuellar  
Chief Engineer  
UniPlex Telecom Technologies, Inc.  
848 Brickell Avenue, Suite 1120  
Miami, FL 33131

*Via First Class Mail and Certified Mail, Return Receipt Requested*

**Re: Potential Reclamation of UniPlex Telecom Technologies, Inc.'s International Signaling Point Code, 3-028-5 (Miami, FL)**

Dear Mr. Cuellar:

By this letter, the Telecommunications and Analysis Division of the Office of International Affairs (OIA) informs you of our intent to reclaim the above-captioned International Signaling Point Code (ISPC), which was provisionally assigned to UniPlex Telecom Technologies, Inc. (UniPlex) on December 8, 2000.<sup>1</sup> We will take this action unless you respond to this letter within thirty (30) days, by **December 1, 2023**, and indicate whether UniPlex is still using the code.

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>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 carrier.”<sup>3</sup> Finally, 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>

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<sup>1</sup> UniPlex Telecom Technologies, Inc., File No. SPC-NEW-20001208-00074 (filed Dec. 8, 2000) (UniPlex ISPC Application); Letter from Cathy Hsu, FCC to Mr. Carlos Cuellar, Chief Engineer, UniPlex Telecom Technologies, Inc. (Dec. 8, 2000) (UniPlex Grant Letter).

<sup>2</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.708-199903-1> (ITU-T Recommendation Q.708).

<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, 35 FCC Rcd 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.

In its letter granting the provisional assignment of ISPC 3-028-5 to UniPlex, the Telecommunications Division (Division) of the International Bureau (Bureau) of the Federal Communications Commission required UniPlex to inform the Division of the date the code was implemented.<sup>5</sup> In granting the UniPlex ISPC Application, the Division also stated that requests for ISPCs must “strictly fit the [ITU-T Recommendation Q.708] guidelines and that ‘warehousing’ of ISPC assignments be avoided. . . .”<sup>6</sup> Additionally, UniPlex was subject to annual traffic and revenue reporting requirements at the time of its ISPC assignment.<sup>7</sup> We have no record that UniPlex informed the Division of the date the code was implemented or filed any international Traffic and Revenue reports for the years 2007-2015.<sup>8</sup>

In March 2020, Division staff<sup>9</sup> made several attempts to contact UniPlex to ascertain whether it is using its assigned ISPC. On March 5, 2020, the staff sent an inquiry to the email address on file, which was returned due to an unknown user error.<sup>10</sup> Additionally, on March 5, 2020 and November 16, 2021, the staff called UniPlex’s phone number on record, but the call could not be completed.<sup>11</sup> The FCC 499 Filer Database indicates that UniPlex has not been active since November 30, 2006, and that it “has gone out of business in it’s [*sic*] entirety (no sale of assets involved).”<sup>12</sup> Finally, according to Florida’s Department of State, Division of Corporations website, UniPlex has been inactive since 2008, when it was dissolved.<sup>13</sup> Based on our inability to contact a representative of UniPlex, our records, and the

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<sup>5</sup> UniPlex Grant Letter at 2.

<sup>6</sup> *Id.* at 1.

<sup>7</sup> See generally *Amendment of Section 43.61 of the Commission’s Rules*, CC Docket No. 91-22, Report and Order, 7 FCC Rcd 1379 (1992) (establishing the traffic and revenue reporting requirements that were in effect at the time of UniPlex’s ISPC assignment).

<sup>8</sup> In 2017, the Commission eliminated the requirement that U.S. providers of international telecommunications services file annual Traffic and Revenue Reports. See *Section 43.62 Reporting Requirements for U.S. Providers of International Services; 2016 Biennial Review of Telecommunications Regulations*, IB Docket Nos. 17-55, 16-131, Report and Order, 32 FCC Rcd 8115 (2017). Providers, including UniPlex, were required to file the final traffic and revenue data for calendar year 2015.

<sup>9</sup> The Telecommunications Division, also known in the past as the Policy Division, was renamed the Telecommunications and Analysis Division in 2015 as a result of an International Bureau reorganization. See *International Bureau Reorganization*, FCC New Release, December 14, 2015 (<https://docs.fcc.gov/public/attachments/DOC-336832A1.pdf>). In 2023, the Commission adopted an order that reorganized the International Bureau into: (1) a Space Bureau and (2) an Office of International Affairs (OIA). See *Establishment of the Space Bureau and the Office of International Affairs and Reorganization of the Consumer and Governmental Affairs Bureau and the Office of the Managing Director*, Order, MD Docket No. 23-12, FCC 23-1 (rel. Jan. 9, 2023). As a result of this reorganization, the Telecommunications and Analysis Division became a division within OIA.

<sup>10</sup> Email from Arthur Lechtman, Attorney-Advisor, Telecommunications and Analysis Division, International Bureau, to Cecilia Zurita, UniPlex Telecom Technologies, Inc. (lwhan@uniplex.net) (March 5, 2020, 6:14 PM); Return email from Mail Delivery Subsystem to Arthur Lechtman, Attorney-Advisor, Telecommunications and Analysis Division, International Bureau (March 5, 2020, 6:15 PM). These emails are reprinted in the Attachment.

<sup>11</sup> Staff called the following telephone number: (305) 858-6700.

<sup>12</sup> FCC Form 499 Filer Database, UniPlex Telecom Technologies, Inc., <https://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=819879> (last visited Oct. 11, 2023).

<sup>13</sup> See Florida, Department of State, Division of Corporations, Search Records, <https://dos.myflorida.com/sunbiz/search/> (last visited Oct. 11, 2023).

records of Florida's Department of State, we believe UniPlex may no longer be providing service and is no longer using its assigned ISPC.

We request that you respond to this letter by **December 1, 2023**, and indicate the date the code was implemented and describe the current use of UniPlex's ISPC (3-028-5). A failure to respond to this letter will serve as confirmation that UniPlex is no longer using its provisionally assigned ISPC and has failed to comply with our ISPC requirements. If you fail to respond to this letter as requested, we will reclaim the ISPC (3-028-5) and immediately thereafter make the code available for reassignment consistent with the terms of ITU-T Recommendation Q.708. We are addressing this letter to the most recent contacts and addresses of record provided by UniPlex.

If you have any questions, please contact me at (202) 418-7370 or [Francis.Gutierrez@fcc.gov](mailto:Francis.Gutierrez@fcc.gov) or my colleague 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  
Office of International Affairs

cc:

Leonard Whan  
Ramon Ramirez  
848 Brickell Avenue, Suite 1120  
Miami, FL 33131

Washington Vasconez  
Cecilia Zurita  
UniPlex Telecom Technologies, Inc.  
168 S.E. 1st Street, Suite 1101  
Miami, FL 33131

National Registered Agents, Inc.  
c/o UniPlex Telecom Technologies, Inc.  
1090 Vermont Avenue NW, Suite 910  
Washington, DC 20005

**Attachment**

Email Exchange with UniPlex Telecom Technologies, Inc.

-----Original Message-----

From: Mail Delivery Subsystem <MAILER-DAEMON@mx0a-0024ed01.pphosted.com>  
Sent: Thursday, March 5, 2020 6:15 PM  
To: prvs=0333312e3c=arthur.lechtman@fcc.gov  
Subject: Returned mail: see transcript for details

The original message was received at Thu, 5 Mar 2020 23:13:53 GMT from m0102173.ppop.net [127.0.0.1]

----- The following addresses had permanent fatal errors ----- <lwhan@uniplex.net>  
(reason: 550 No Such User Here)

----- Transcript of session follows ----- ... while talking to mail.uniplex.net.:  
>>> DATA  
<<< 550 No Such User Here  
550 5.1.1 <lwhan@uniplex.net>... User unknown <<< 503-All RCPT commands were rejected with this error:  
<<< 503-No Such User Here  
<<< 503 Valid RCPT command must precede DATA

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From: Arthur Lechtman <Arthur.Lechtman@fcc.gov>  
Sent: Thursday, March 5, 2020 6:14 PM  
To: lwhan@uniplex.net  
Cc: Francis Gutierrez <Francis.Gutierrez@fcc.gov>; Stacey Ashton <Stacey.Ashton@fcc.gov>  
Subject: UniPlex ISPC inquiry

Hello-

I am writing to inquire whether UniPlex Telecom Technologies is still using the international signaling point code that it was assigned in 2000 (3-028-5). Please let me know 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