



Federal Communications Commission  
Washington, D.C. 20554

January 29, 2024

DA-24-83

**By Certified Mail, First-Class Mail, and Email**

Miguel Vazquez  
President and Chief Executive Officer  
Phonetime Inc.  
1250 E Hallandale Beach Blvd.  
Hallandale, FL 33009  
[mike@phonetime.com](mailto:mike@phonetime.com)

**Re: Proposed Transfer of Control of Phonetime Inc. from Tellza, Inc. to Mexedia, Inc.,  
File No. ITC-T/C-20230327-00041**

Dear Mr. Vazquez:

On March 24, 2023, Phonetime Inc. (Phonetime), Mexedia, Inc. (Mexedia), and Tellza, Inc. (Tellza, and together, the “Applicants”) filed the above referenced application with the Federal Communications Commission (Commission or FCC) seeking consent to the proposed transfer of control of Phonetime from Tellza to Mexedia.<sup>1</sup> On April 7, 2023, the Office of International Affairs found the application acceptable for filing and referred the application to the Committee for the Assessment of Foreign Participation in the United States Telecommunications Sector (Committee) for review of any national security or law enforcement concerns related to the foreign ownership of the Applicants.<sup>2</sup> On November 2, 2023, the Committee returned the above referenced application to the Commission stating that based “upon [the Committee’s] consideration of the application, the information provided by the involved parties, and publicly available information,”<sup>3</sup> the Applicants “appear to have engaged in an unauthorized transfer of control of an international facilities-based section 214 authorization” and the Committee “is informing the FCC so that the FCC may take any appropriate action in accordance with FCC rules and regulations.”<sup>4</sup>

The Committee states that, in January 2023, prior to filing the above referenced application with the Commission, “Tellza appears to have transferred control of Phonetime and its international section 214 authorization, ITC-214-19970516-00274, to Mexedia without FCC approval.”<sup>5</sup> The Committee asserts that Mexedia and Phonetime are holding Phonetime out to the public as a Mexedia company, despite not yet receiving approval from the Commission.<sup>6</sup>

Phonetime must respond to this letter and the Committee’s allegations by **February 28, 2024**. We ask that you address in detail whether the transaction has been consummated prior to FCC approval in violation the

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<sup>1</sup> FCC Transfer of Control Application, FCC File No. ITC-T/C-20230327-00041 (Mar. 24, 2023).

<sup>2</sup> *Non Streamlined International Applications/Petitions Accepted for Filing*, Public Notice, Report No. TEL-02264NS at 1 (OIA April 7, 2023).

<sup>3</sup> Letter from Makenzie B. Skopowski, Attorney Advisor, Foreign Investment Review Section, National Security Division, U.S. Department of Justice, to Marlene H. Dortch, FCC at 1 (Nov. 2, 2023) (on file in ITC-T/C-20230327-00041) (DOJ Letter).

<sup>4</sup> *Id.*

<sup>5</sup> *Id.* at 3.

<sup>6</sup> *Id.* (for example, stating that on September 16, 2022, Mexedia posted a press release on its website titled, “Phonetime and Matchcom Acquisition.”).

Communications Act of 1934, as amended (Act) and the Commission's transfer of control rules.<sup>7</sup> If so, we ask that you identify the date on which the transaction was consummated and whether Mexedia currently controls Phonetime. We note that we have referred this matter to the FCC's Enforcement Bureau.

Sincerely,

*/Denise Coca/*  
Denise Coca, Chief  
Telecommunications Analysis Division  
Office of International Affairs

Enclosures: DOJ Letter Redacted

cc:

By Certified Mail, First-Class Mail, and Email:

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<sup>7</sup> 47 CFR § 63.24.



U.S. Department of Justice

National Security Division

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*Foreign Investment Review Section*

*Washington, D.C. 20530*

November 2, 2023

*By Electronic Mail*

Ms. Marlene H. Dortch  
Federal Communications Commission  
445 12th St. SW, Room TW-B204  
Washington, DC 20554

**Re: Notice of Apparent Violation and Return of Application; Phonetime Inc./Tellza, Inc./Mexedia, Inc.; TT Case No. TT-2023-016; FCC Docket No. ITC-T/C-20230327-00041.**

Dear Ms. Dortch:

The Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (hereinafter the “Committee”) hereby notifies the Federal Communications Commission (“FCC”) that the above-referenced application is being returned to the FCC for further review under the FCC’s rules and regulations.<sup>1</sup> Specifically, the applicants in the above-described application appear to have engaged in an unauthorized transfer of control of an international facilities-based section 214 authorization. The Committee is informing the FCC so that the FCC may take any appropriate action in accordance with FCC rules and regulations.

## **I. Background and Procedural History**

On March 24, 2023, Phonetime Inc. (“Phonetime”), Mexedia, Inc. (“Mexedia”), and Tellza, Inc. (“Tellza”) filed an application to the FCC seeking consent to the proposed transfer of control of Phonetime from Tellza to Mexedia.<sup>2</sup> Phonetime is a Florida corporation that holds an international section 214 facilities-based authorization from the FCC (ITC-214-19970516-00274).<sup>3</sup> Phonetime was granted international section 214 authority on July 3, 1997, to operate as a facilities based-carrier in accordance with the provisions of 47 C.F.R. § (e)(1) of the FCC’s rules.<sup>4</sup> Phonetime is a supplier of long-distance services, and holds itself out to the public as such

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<sup>1</sup> See attached notification from the Chair.

<sup>2</sup> FCC Transfer of Control Application, FCC File No. ITC-T/C-20230327-00041 (Mar. 24, 2023) (the “2023 FCC Application”) (PUBLIC EXHIBIT 1), at PHONETIME-PUBLIC-001 to 012.

<sup>3</sup> *Id.* at PHONETIME-PUBLIC-001 to 002.

<sup>4</sup> *Id.* at PHONETIME-PUBLIC-004 to 005.

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a provider.<sup>5</sup> The applicants stated that Phonetime’s parent company at the time of the application was Tellza, a publicly traded Canadian company (TSX: TEL).<sup>6</sup> Tellza, the Canadian entity, also owns another entity called Tellza, Inc. that is incorporated in Florida company and a supplier of long-distance telecommunications services, as well as Matchcom Telecommunications (“Matchcom”).<sup>7</sup> In their 2023 FCC Application, the applicants listed the Chief Executive Officer (“CEO”) of both Phonetime and Tellza as Mike Vazquez.<sup>8</sup>

Mexedia, Inc. (f/k/a Airtime Technologies USA, Inc.) is a Florida-based corporation.<sup>9</sup> The applicants describe Mexedia as a “technology company that offers innovative solutions, and consolidated tools encapsulated in a single integrated technology ecosystem, enabling companies to manage all customer communications activities.”<sup>10</sup> Mexedia is owned by Mexedia Societa Per Azioni SB (“Mexedia SPA”), which is incorporated in Italy.<sup>11</sup> Mexedia SPA is a subsidiary of an Ireland-based entity called Heritage Ventures, Limited (“Heritage Ventures”).<sup>12</sup> Orlando Taddeo, an Italian citizen, is the sole owner of Heritage Ventures which holds an 89.5 percent interest in Mexedia SPA.<sup>13</sup>

The requested transfer of control does not involve a transfer of operating authority, assets, or customers.<sup>14</sup> Once complete, the transaction would allow Phonetime to continue to provide service to its existing customers under existing service arrangements.<sup>15</sup> The applicants assert that the transfer of control will serve the public interest by allowing the companies to offer less expensive services, better enabling them to serve both international and domestic customers.<sup>16</sup>

On April 7, 2023, the FCC found the application to be acceptable for filing. The FCC then referred the application to the Committee for its views on any national security, law enforcement, foreign policy, or trade policy concerns related to the foreign ownership of the applicants.<sup>17</sup> The Committee has reviewed Phonetime’s application, as well as the applicants’ responses to the Committee’s triage questions. Upon consideration of the application, the information provided by the involved parties, and publicly available information, the Committee

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<sup>5</sup> See *id.* at PHONETIME-PUBLIC-002; see also *Who We Are*, PHONETIME, <https://www.phonetime.com/-/phonetime-tabs-vertical> (last visited Oct. 11, 2023) (PUBLIC EXHIBIT 3), at PHONETIME-PUBLIC-014.

<sup>6</sup> 2023 FCC Application, at PHONETIME-PUBLIC-002; Supplemental Information for Application ITC-T/C-20230327-00041 (Apr. 11, 2023) (PUBLIC EXHIBIT 2), at PHONETIME-PUBLIC-013.

<sup>7</sup> 2023 FCC Application, at PHONETIME-PUBLIC-002; *About Us*, MATCHCOM, <https://matchcoms.com/> (last visited Oct. 16, 2023) (PUBLIC EXHIBIT 4), at PHONETIME-PUBLIC-015 (explaining that Matchcom is an international wholesale business company that provides value throughout their business partnerships.); Supplemental Information for Application ITC-T/C-20230327-00041, at PHONETIME-PUBLIC-013.

<sup>8</sup> See 2023 FCC Application, at PHONETIME-PUBLIC-004.

<sup>9</sup> *Id.* at PHONETIME-PUBLIC-002.

<sup>10</sup> *Id.*

<sup>11</sup> *Id.* PHONETIME-PUBLIC-006.

<sup>12</sup> *Id.*

<sup>13</sup> *Id.* at PHONETIME-PUBLIC-002.

<sup>14</sup> *Id.*

<sup>15</sup> *Id.* at PHONETIME-PUBLIC-009.

<sup>16</sup> *Id.*

<sup>17</sup> FCC Non Streamlined International Applications/Petitions Accepted For Filing Section 214 Applications, Public Notice, Report No. TEL-02264NS (Apr. 7, 2023), <https://docs.fcc.gov/public/attachments/DOC-392404A1.pdf> (PUBLIC EXHIBIT 5), at PHONETIME-PUBLIC-016 to 017.

is returning the application to the FCC for further review under its rules and regulations for the reasons outlined below.

## II. Relevant FCC Rules

International mergers and acquisitions are subject to 47 C.F.R. § 63.24.<sup>18</sup> Pursuant to 47 C.F.R. § 63.24(a), “[A]n international section 214 authorization may be assigned, or control of such authorization may be transferred by the transfer of control of any entity holding such authorization, to another party, whether voluntarily or involuntarily, directly or indirectly, *only upon application to and prior approval by the Commission* (emphasis added).<sup>19</sup>

Pursuant to 47 C.F.R. § 63.24(b):

[A] transfer of control is a transaction in which the authorization remains held by the same entity, but there is a change in the entity or entities that control the authorization holder. *A change from less than 50 percent ownership to 50 percent or more ownership shall always be considered a transfer of control. A change from 50 percent or more ownership to less than 50 percent ownership shall always be considered a transfer of control* (emphasis added).<sup>20</sup>

## III. Apparent Violations

In January 2023, Tellza appears to have transferred control of Phonetime, and its international section 214 authorization, ITC-214-19970516-00274, to Mexedia without FCC approval. A review of available information suggests that the transfer of control has already taken place.

Mexedia and Phonetime are holding Phonetime out to the public as a Mexedia company. On September 16, 2022, Mexedia posted a press release on its website titled, “Phonetime and Matchcom Acquisition” indicating that it had closed agreements to purchase Phonetime and Matchcom.<sup>21</sup> When asked about the press release on Mexedia’s website which indicates that Mexedia has already closed on its acquisition of Phonetime, Mexedia stated, [REDACTED].<sup>22</sup> The company also stated that [REDACTED].<sup>23</sup> Mexedia’s website lists both Phonetime and Matchcom Telecommunications as recent additions to its list of Mexedia owned companies.<sup>24</sup>

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<sup>18</sup> *Transfer of Control*, FEDERAL COMMUNICATIONS COMMISSION, <https://www.fcc.gov/general/transfer-control>.

<sup>19</sup> 47 C.F.R. § 63.24(a).

<sup>20</sup> 47 C.F.R. § 63.24(c).

<sup>21</sup> *Phonetime and Matchcom Acquisition*, MEXEDIA, <https://mexedia.com/en/press-releases/> (“Italian tech company Mexedia SpA SB closes agreements to purchase Phonetime Inc. and Matchcom Telecommunications Inc. (together, the US companies) as part of the 2025 medium term plan which the company has set out last May.”) (last visited Oct. 11, 2023) (PUBLIC EXHIBIT 6), at PHONETIME-PUBLIC-018.

<sup>22</sup> Phonetime Inc./Tellza, Inc./Mexedia, Inc. Triage Response, Round III, Question 11 (Sept. 28, 2023) (CONFIDENTIAL EXHIBIT 1).

<sup>23</sup> *Id.*

<sup>24</sup> *About Us*, MEXEDIA, <https://mexedia.com/en/the-group/> (PUBLIC EXHIBIT 7), at PHONETIME-PUBLIC-019.

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Phonetime’s website specifically states, “Phonetime is part of Mexedia S.p.A. SB.”<sup>25</sup> Similar to Phonetime’s website, Matchcom’s website also states, “Matchcom is a company of Mexedia S.p.A. SB.”<sup>26</sup>

Additionally, Mexedia’s leadership and owners appear to already be in control of Phonetime. In June 2023, when asked to provide information about what Mexedia’s leadership role in Phonetime would be post-transaction, the applicants stated that [REDACTED].<sup>27</sup> According to Phonetime’s 2023 Foreign Profit Corporation Annual Report,<sup>28</sup> a public document filed with the Florida Secretary of State on April 14, 2023, Orlando Taddeo is listed as a director of Phonetime and Daniel Contreras is identified as the President and CEO of Phonetime.<sup>29</sup>

<b>2023 FOREIGN PROFIT CORPORATION ANNUAL REPORT</b> DOCUMENT# F19000003980 <b>Entity Name:</b> PHONETIME INC. <b>Current Principal Place of Business:</b> 1680 MICHIGAN AVENUE SUITE 700 MIAMI BEACH, FL 33139  <b>Current Mailing Address:</b> 1680 MICHIGAN AVENUE SUITE 700 MIAMI BEACH, FL 33139 US  <b>FEI Number:</b> NOT APPLICABLE <b>Name and Address of Current Registered Agent:</b> GRAYROBINSON, P.A. 401 EAST LAS OLAS BOULEVARD 10TH FLOOR FORT LAUDERDALE, FL 33301 US	<b>FILED</b> <b>Apr 14, 2023</b> <b>Secretary of State</b> <b>7226804386CC</b>
<b>Certificate of Status Desired:</b> No	
<i>The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.</i>	
<b>SIGNATURE:</b> CARLOS J. REYES, ESQ. Electronic Signature of Registered Agent	<u>04/14/2023</u> Date
<b>Officer/Director Detail :</b>	
<b>Title</b> PRESIDENT, CEO <b>Name</b> CONTRERAS, DANIEL <b>Address</b> 1680 MICHIGAN AVENUE SUITE 700 <b>City-State-Zip:</b> MIAMI BEACH FL 33139	<b>Title</b> DIRECTOR <b>Name</b> TADDEO, ORLANDO <b>Address</b> 1680 MICHIGAN AVENUE SUITE 700 <b>City-State-Zip:</b> MIAMI BEACH FL 33139

In September 2023, when asked why Daniel Contreras is now listed as the CEO of Phonetime if the transaction has not yet occurred, Phonetime explained: [REDACTED].<sup>30</sup>

<sup>25</sup> *Who We Are*, at PHONETIME-PUBLIC-014.

<sup>26</sup> *See About Us*, MATCHCOM <https://matchcoms.com/> (PUBLIC EXHIBIT 4), at PHONETIME-PUBLIC-015.

<sup>27</sup> Phonetime Inc./Tellza, Inc./Mexedia, Inc. Triage Response, Section II, Question 9(b)(ii) (June 14, 2023) (CONFIDENTIAL EXHIBIT 2).

<sup>28</sup> Each year, the Florida Secretary of State requires all Florida businesses to file an Annual Report for the previous year to maintain an “active status.”

<sup>29</sup> 2023 Foreign Profit Corporation Annual Report, Florida Department of State (April 14, 2023) <https://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquiryType=DocumentNumber&aggregateId=forp-f19000003980-6055fe81-bb04-44e2-a4ff-9d6e699c2631&directionType=Initial&searchNameOrder=PHONETIME%20F190000039800&searchTerm=F1900003980> (last visited Oct. 11, 2023) (PUBLIC EXHIBIT 8), at PHONETIME-PUBLIC-021.

<sup>30</sup> Phonetime Inc./Tellza, Inc./Mexedia, Inc. Triage Response, Round III, Question 11 (Sept. 28, 2023); CONFIDENTIAL EXHIBIT 1.

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The applicants further explained that these corporate leadership changes are [REDACTED].<sup>31</sup> Moreover, the applicants contended that transaction had not yet been completed because [REDACTED].<sup>32</sup>

[REDACTED].<sup>33</sup> As noted above, FCC rules state, “A change from 50 percent of more ownership to less than 50 percent ownership shall always be considered a transfer of control.”<sup>34</sup> [REDACTED].

Separately, the Committee notes that Phonetime appears to have been previously involved in an unauthorized transfer of control of an international section 214 authorization several years ago. On November 10, 2009, as related to a review of Phonetime’s application to the FCC to acquire control of Symphony Telecommunications, LLC (“Symphony”) (FCC IB File No. ITC-T/C-20080206-00088) by the ad hoc group of Executive Branch agencies formerly known as Team Telecom, Phonetime provided a Letter of Agreement to the U.S. Department of Justice (“DOJ”) and the U.S. Department of Homeland Security (“DHS”) outlining obligations Phonetime agreed to undertake to mitigate risks to U.S. national security and law enforcement interests.<sup>35</sup> The Letter of Agreement—signed by Phonetime’s then-President and CEO, as well as its Chief Financial Officer—stated that “[t]he [FCC] granted Symphony’s section 214 authority in 2004 in IB File No. ITC-214-20041201-00472. Phonetime acquired Symphony in late 2007 without the required FCC transfer-of-control authorization.”<sup>36</sup>

## I. Conclusion

The facts above suggest that the applicants may have engaged in a transfer of control within authorization from the FCC. Phonetime and Mexedia are communicating to the public that Phonetime is a Mexedia company; Phonetime identifies Mexedia corporate leaders and owners as its own; and [REDACTED]. There is no record of a corresponding FCC approval for a transfer of control of Phonetime’s international Section 214 authorization. Accordingly, the

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<sup>31</sup> *Id.*

<sup>32</sup> *Id.*

<sup>33</sup> Phonetime Inc./Tellza, Inc./Mexedia, Inc. Triage Response, Round III, Exhibit B (Sept 28, 2023); CONFIDENTIAL EXHIBIT 1. [REDACTED]. Phonetime Inc./Tellza, Inc./Mexedia, Inc. Triage Response, Round I, Question 27 (July 28, 2023) (CONFIDENTIAL EXHIBIT 3).

<sup>34</sup> 47 CFR § 63.24(c) (“A change from 50 percent or more ownership to less than 50 percent ownership shall always be considered a transfer of control.”).

<sup>35</sup> Petition to Adopt Conditions to Authorizations and Licenses, *In the Matter of Phonetime, Inc. Application for consent to transfer control of Section 214 authorization under the Communications Act of 1934, as amended*, FCC File No. ITC-T/C-20080206-00088 (Nov. 18, 2009), including the Phonetime, Inc. Letter of Agreement (Nov. 10, 2009) (PUBLIC EXHIBIT 9), at PHONETIME-022 to 026.

<sup>36</sup> *See id.* at PHONETIME-PUBLIC-024. Phonetime’s November 10, 2009 Letter of Agreement to DOJ and DHS was later superseded by a June 5, 2018 Letter of Agreement made by Tellza Inc. to DOJ, signed by Mike Vazquez as CEO of Tellza. Petition to Adopt Conditions to Authorizations and Licenses, *In the Matter of Matchcom Telecommunications and Phonetime, Inc. Application for Global and Limited Facilities-based Authority and Global and Limited Global Resale Authority Pursuant to Section 214 of the Communications Act of 1934, as amended*, FCC File No. ITC-214-20170227-00054, including the Tellza, Inc. Letter of Agreement (June 5, 2018) (PUBLIC EXHIBIT 10), at PHONETIME-PUBLIC-027 to 035. Matchcom later voluntarily surrendered the international Section 214 authorization related to the June 5, 2018 Letter of Agreement. *See Matchcom Telecommunications, Inc., Voluntary Surrender of International Section 214 Authorization*, IBFS File No. ITC-214-20170227-00054 (Dec. 2, 2020) (PUBLIC EXHIBIT 11), at PHONETIME-PUBLIC-036.

application is being returned to the FCC so that the FCC may take any appropriate action in accordance with FCC rules and regulations.

Thank you for your consideration.

Sincerely,

/s/

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**Makenzie B. Skopowski**  
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(202) 305-5835

**Tyler J. Wood**  
Deputy Chief  
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2	Supplemental Information for Application ITC-T/C-20230327-00041 (Apr. 11, 2023), <a href="https://licensing.fcc.gov/myibfs/download.do?attachment_key=21502087">https://licensing.fcc.gov/myibfs/download.do?attachment_key=21502087</a> .	PHONETIME-PUBLIC-013
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5	FCC Non Streamlined International Applications/Petitions Accepted For Filing Section 214 Applications, Public Notice, Report No. TEL-02264NS (Apr. 7, 2023), <a href="https://docs.fcc.gov/public/attachments/DOC-392404A1.pdf">https://docs.fcc.gov/public/attachments/DOC-392404A1.pdf</a> .	PHONETIME-PUBLIC-016
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8	2023 Foreign Profit Corporation Annual Report, Florida Department of State (Apr. 14, 2023) <a href="https://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquiryType=DocumentNumber&amp;aggregateId=forp-f19000003980-6055fe81-bb04-44e2-a4ff-9d6e699c2631&amp;directionType=Initial&amp;searchNameOrder=PHONETIME%20F190000039800&amp;searchTerm=F19000003980">https://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquiryType=DocumentNumber&amp;aggregateId=forp-f19000003980-6055fe81-bb04-44e2-a4ff-9d6e699c2631&amp;directionType=Initial&amp;searchNameOrder=PHONETIME%20F190000039800&amp;searchTerm=F19000003980</a> .	PHONETIME-PUBLIC-021
9	Petition to Adopt Conditions to Authorizations and Licenses, <i>In the Matter of Phonetime, Inc. Application for consent to transfer control of Section 214 authorization under the Communications Act of 1934, as amended</i> , FCC File No. ITC-T/C-20080206-00088 (Nov. 18, 2009), including the Phonetime, Inc. Letter of Agreement (Nov. 10, 2009), <a href="https://licensing.fcc.gov/myibfs/download.do?attachment_key=782144">https://licensing.fcc.gov/myibfs/download.do?attachment_key=782144</a> .	PHONETIME-PUBLIC-022

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<b>Ex. No.</b>	<b>Description</b>	<b>Start Page</b>
10	Petition to Adopt Conditions to Authorizations and Licenses, <i>In the Matter of Matchcom Telecommunications and Phonetime, Inc. Application for Global and Limited Facilities-based Authority and Global and Limited Global Resale Authority Pursuant to Section 214 of the Communications Act of 1934, as amended</i> , FCC File No. ITC-214-20170227-00054, including the Tellza, Inc. Letter of Agreement (June 5, 2018), <a href="https://licensing.fcc.gov/myibfs/download.do?attachment_key=1427170">https://licensing.fcc.gov/myibfs/download.do?attachment_key=1427170</a> .	PHONETIME-PUBLIC-027
11	Matchcom Telecommunications, Inc., Voluntary Surrender of International Section 214 Authorization, IBFS File No. ITC-214-20170227-00054 (Dec. 2, 2020), <a href="https://licensing.fcc.gov/myibfs/download.do?attachment_key=2863519">https://licensing.fcc.gov/myibfs/download.do?attachment_key=2863519</a> .	PHONETIME-PUBLIC-036

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<b>Ex. No.</b>	<b>Description</b>
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2	Phonetime Inc./Tellza, Inc./Mexedia, Inc. Triage Response (June 14, 2023).
3	Phonetime Inc./Tellza, Inc./Mexedia, Inc. Triage Response (July 28, 2023).



**U.S. Department of Justice**

**National Security Division**

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*Foreign Investment Review Section*

*Washington, D.C. 20530*

**Phonetime Inc., FCC File No. ITC-T/C-20230327-00041 (TT 23-016)**

Pursuant to Executive Order 13913 (Apr. 4, 2020), the Chair of the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (“Committee”) returns the above-referenced application for further review under the Commission’s rules and regulations.

A handwritten signature in black ink that reads "Devin A. DeBacker".

Digitally signed by DEVIN  
DEBACKER  
Date: 2023.11.01 11:52:34  
-04'00'

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Devin A. DeBacker  
Chief  
Foreign Investment Review Section  
National Security Division  
U.S. Department of Justice