

**STATEMENT OF
COMMISSIONER GEOFFREY STARKS**

Re: *China Telecom (Americas) Corporation*, GN Docket No. 20-109; ITC-214-20010613-00346; ITC-214-20020716-00371; ITC-T/C-20070725-00285.

There are those out there who would attack our telecom networks. In just the last few months, we've learned about a hacker [stealing](#) the personal data of more than 50 million customers of a major American wireless carrier. We've read accounts of hackers penetrating the systems of a critical U.S. telecom backbone [provider](#), gaining access to cellphone data for millions of users over a five-year period. And just last week, a cybersecurity research firm [disclosed](#) that hackers have been breaking into the computer networks of telecom companies across the world since 2016.

One of the reasons Congress created the FCC was to protect our networks from attacks like these. But even as hackers continue to attack our networks through the "back door," we face another threat from the "front door" – carriers that are owned or otherwise associated with adversary states. These companies seek or possess Commission authorizations to interconnect with U.S. networks and provide services within the U.S. to American citizens and foreign nationals. According to the Executive Branch agencies, with access to our networks and locations in our country, these companies can access, monitor, store, disrupt and misroute U.S. communications, misuse customer information, and facilitate espionage and other activities harmful to the United States.

Although we've acted against several such carriers, China Telecom Americas is a distinctly clear example of a company subject to the control of an adversary state. The company's parent is majority-owned and controlled by a Chinese government-owned enterprise. That parent company is directly accountable to the Chinese Communist Party and must consult with its representatives prior to making any decisions on material issues. And like other Chinese carriers, China Telecom Americas must disclose sensitive customer information whenever the Chinese government demands it.

Based on the information presented by the Executive Branch agencies, these risks are not theoretical. China Telecom Americas' U.S. records are already available to its non-U.S. affiliates abroad.¹ Moreover, according to public accounts, China Telecom Americas' network has misrouted large amounts of information and communications traffic outside of the United States over long periods, often for several months, and sometimes involving U.S. government traffic.² In addition, as detailed in this item, China Telecom Americas has a record of inaccurate representations to the FCC and other U.S. government agencies that demonstrates that it lacks the candor, trustworthiness, and reliability that we demand of our telecommunications carriers.³ Based on the totality of these circumstances, our decision to revoke China Telecom Americas' section 214 authorizations is well-founded.

Thank you to the International Bureau and all the Commission staff that worked on this item for their hard work on this proceeding.

¹ See Order on Revocation and Termination at para. 69.

² See *id.* at para. 88.

³ See *id.* at para. 2.