



What Does Formalizing Team Telecom Mean for Telecommunications Licensees in the U.S.?

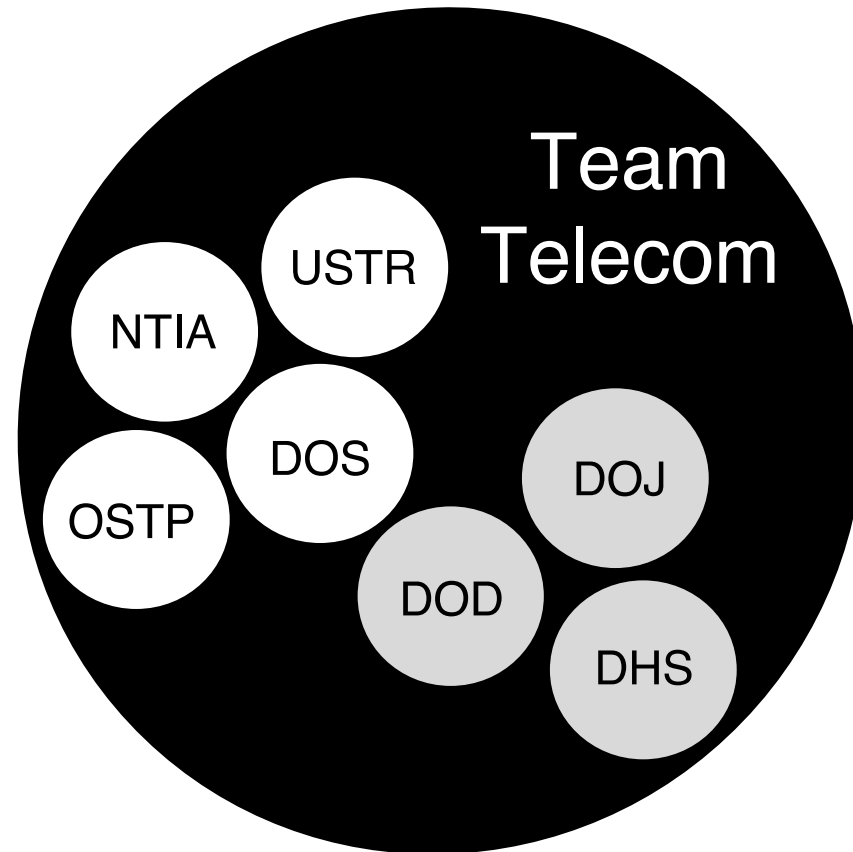
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An interagency group that reviews applications for telecommunications licenses involving **national security**.

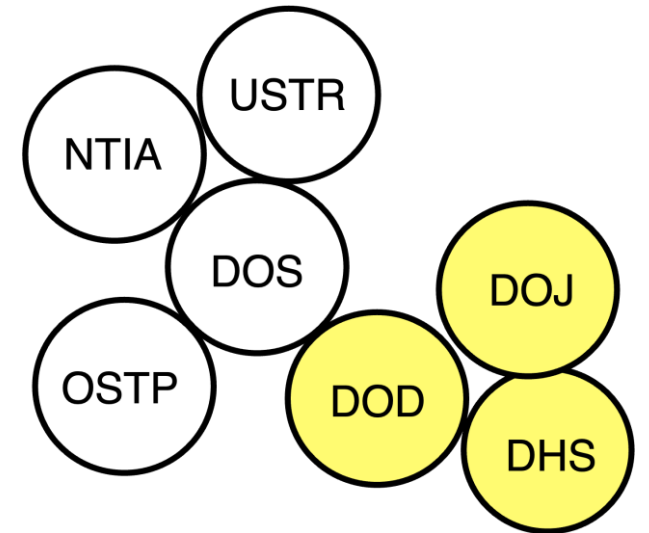
Team Telecom



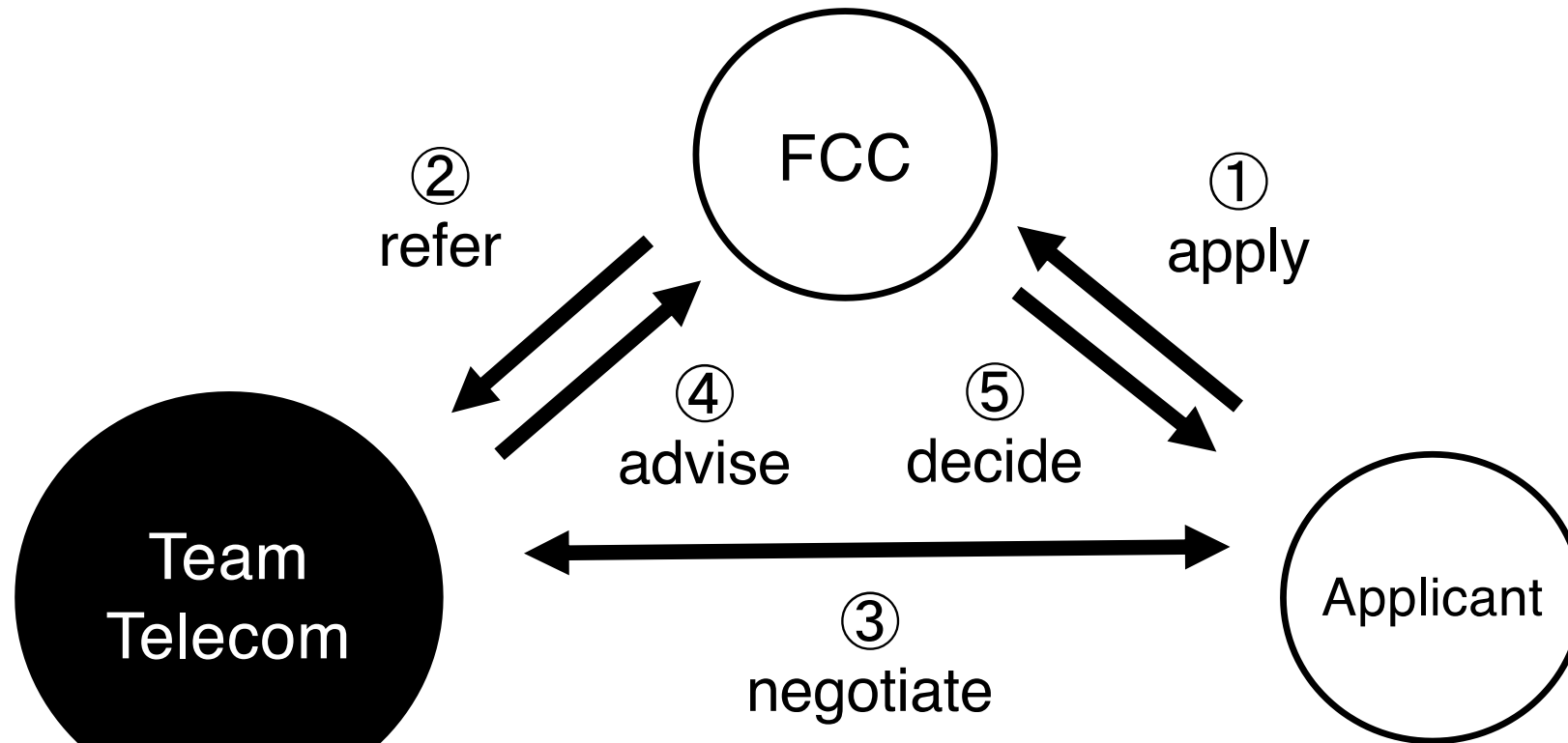
Team Telecom?

- The Federal communication commission (FCC) is responsible for the U.S Telecom licensing review.
- Team Telecom has long advised the FCC on security aspects of its reviews **informally** for over twenty years.

1. Department of Justice (DOJ)
2. Department of Defense (DOD)
3. Department of Homeland Security (DHS)



Team Telecom Review ? - 5 STEP



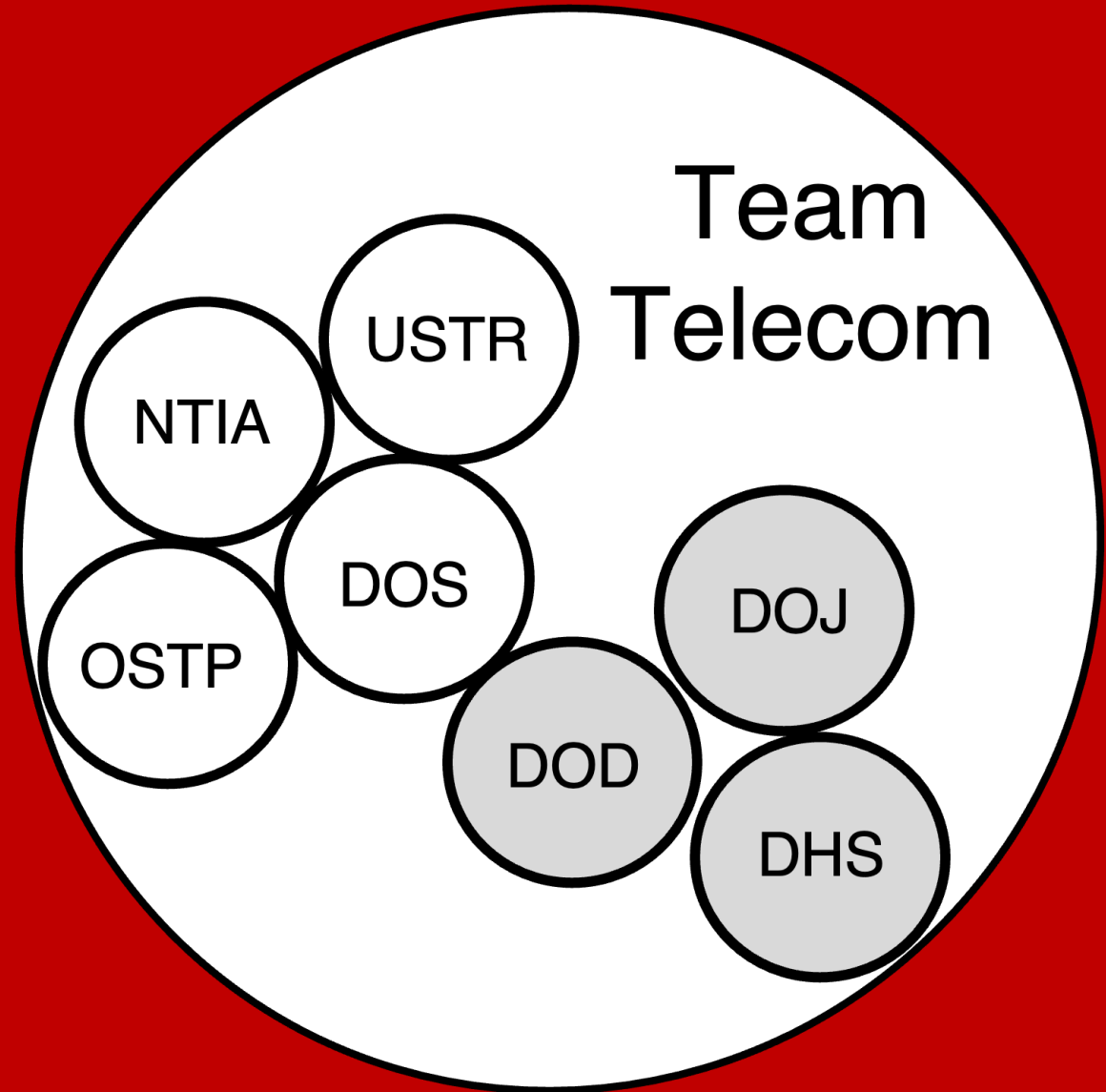
a mitigation agreement



1. Background

April 2020

Formalization of
Team Telecom



1. Background : Formalization of Team Telecom

- Executive Order (EO) 13913 of April 4, 2020.
- The new formalized Team Telecom comprises five features:
 1. Chaired by the DOJ;
 2. Threat assessment by the Director of National Intelligence;
 3. Two-step review;
 4. Annual report to the President;
 5. Authority to review existing licenses

2. Problem :

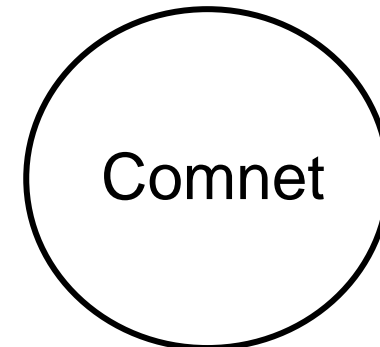
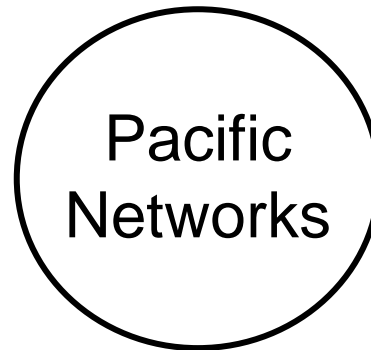
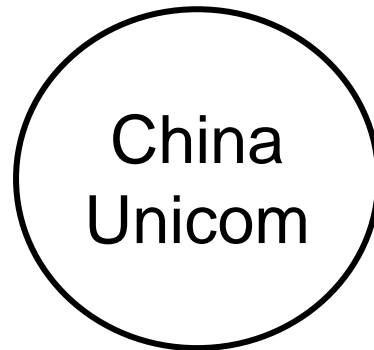
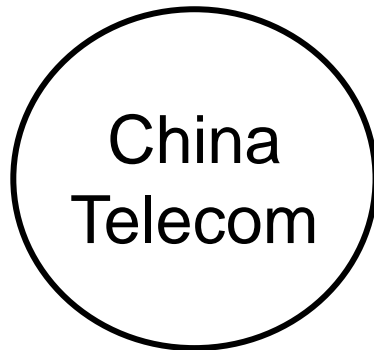
Unknown Impact on Applicants

2. Problem : Unknown Impact on Applicants

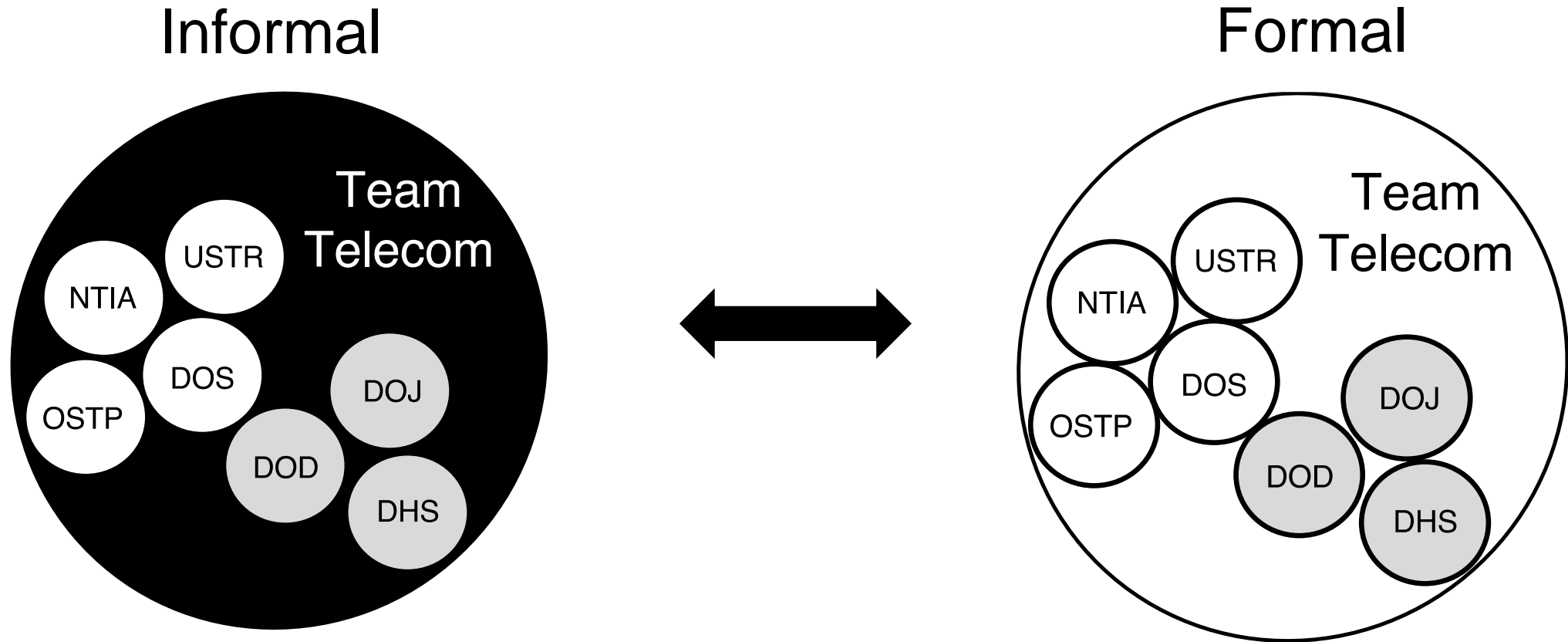
- Section 214 (of the Communications Act of 1934) licenses for international services between the U.S. and a foreign country.
- The existing 214 licenses of **Chinese telecom carriers** were **revoked**.

2021: China Telecom

2022: China Unicom, Pacific Networks, Comnet



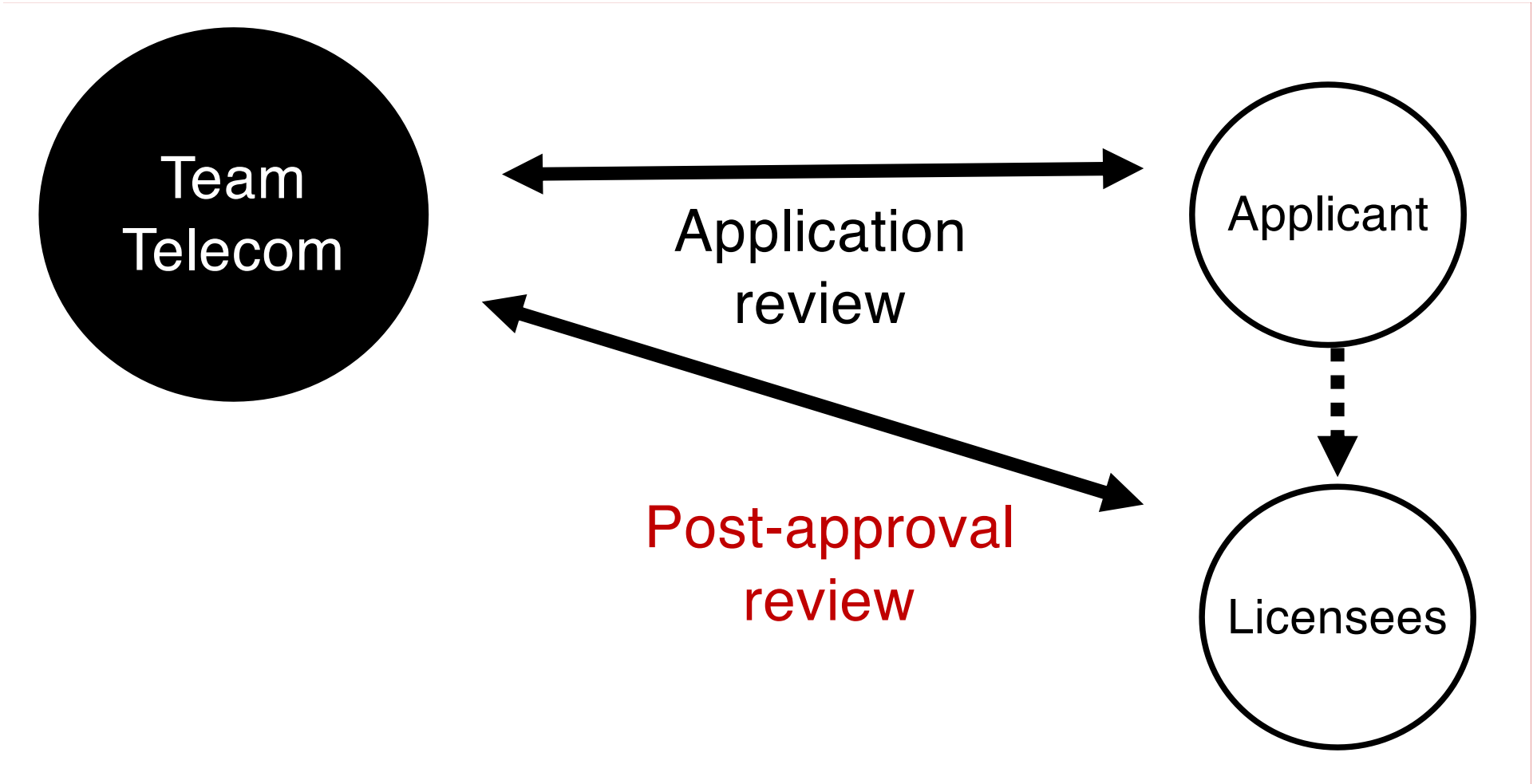
2. Problem : Unknown Impact on Applicant



3 . Research Question

What has the Executive Branch gained
by formalizing Team Telecom?

Take Away!



Increased Risks of Retroactive Revocation

China
Telecom

China
Unicom

?

4 . Method : Analysis of FCC Filing Records

File Number	Stream- lined	Name	Date Filed	Aff Pub Notice Date	Date Grant	Act Pub Notice Date
ITC-214-20010122-00033	Y	QTECH COMPUTERS & NETWORKS, INC.	01/22/2001	01/31/2001	02/14/2001	02/15/2001
ITC-214-20010122-00037	Y	AES COMMUNICATIONS, LLC	01/22/2001	02/02/2001	02/16/2001	02/22/2001
ITC-214-20010122-00051	Y	IDT NETWORK INTERNATIONAL, INC.	01/22/2001	02/07/2001	02/21/2001	02/22/2001
ITC-214-20010123-00031	Y	L.D. WHOLESALE INC.	01/23/2001	01/31/2001	02/14/2001	02/15/2001
ITC-214-20010123-00036	Y	APOLLO COMMUNICATIONS INTERNATIONAL CORPORATION	01/19/2001	02/09/2001	02/23/2001	03/01/2001
ITC-214-20010124-00026	Y	BBH CORP	01/23/2001	01/31/2001	02/14/2001	02/15/2001
ITC-214-20010124-00038	Y	HANARO CORP.	01/23/2001	02/07/2001	02/21/2001	02/22/2001
ITC-214-20010124-00039	Y	ASIA ACCESS TELECOM, INC.	01/23/2001	02/07/2001	02/21/2001	02/22/2001
ITC-214-20010125-00027	Y	TELEPAK NETWORKS, INC.	01/25/2001	01/31/2001	02/14/2001	03/01/2001
ITC-214-20010125-00044	Y	WHOLESALE AIRTIME, INC.	01/25/2001	02/02/2001	02/16/2001	02/22/2001
ITC-214-20010125-00060	Y	Jaguar Communications LLC	01/25/2001	02/09/2001	02/23/2001	04/28/2022
ITC-214-20010126-00049	Y	NORTHEASTERN UNIVERSAL SOFTWARE, INC.	01/26/2001	02/02/2001	02/16/2001	02/22/2001
ITC-214-20010126-00050	Y	MOUNTAIN VIEW TELEPHONE COMPANY	01/26/2001	02/02/2001	02/16/2001	02/22/2001
ITC-214-20010126-00053	Y	Border to Border Communications, Inc.	01/26/2001	02/07/2001	02/21/2001	02/22/2001
ITC-214-20010126-00058	Y	DOYLESTOWN COMUUNICATIONS, INC.	01/25/2001	02/09/2001	02/23/2001	03/01/2001
ITC-214-20010129-00040	Y	PROVECTUS COMMUNICATIONS, INC.	01/23/2001	02/02/2001	02/16/2001	02/22/2001
ITC-214-20010129-00055	Y	CALTEL LONG DISTANCE	01/29/2001	02/07/2001	02/21/2001	02/22/2001
ITC-214-20010130-00043	Y	MOMTEL, INC.	01/30/2001	02/02/2001	02/16/2001	02/22/2001
ITC-214-20010130-00056	Y	NETVOICE TECHNOLOGIES, INC.	01/30/2001	02/07/2001	02/21/2001	02/22/2001
ITC-214-20010130-00061	Y	CUTTER COMMUNICATIONS, INC.	01/30/2001	02/09/2001	02/23/2001	03/01/2001
ITC-214-20010131-00064	Y	CATALYST NETWORK, INC.	01/31/2001	02/21/2001	03/07/2001	03/08/2001
ITC-214-20010204-00052	Y	STAR DIRECT TELECOM, INC.	02/03/2001	02/07/2001	02/21/2001	02/22/2001
ITC-214-20010206-00065	Y	GLOBAL PREPAID ALLIANCE, INC.	02/06/2001	02/21/2001	03/07/2001	03/08/2001
ITC-214-20010207-00073	Y	INTERNET VIP INC.	02/07/2001	02/23/2001	03/09/2001	03/15/2001
ITC-214-20010208-00067	Y	YELL COUNTY TELEPHONE COMPANY	02/08/2001	02/21/2001	03/07/2001	03/08/2001
ITC-214-20010208-00074	Y	CALL US, INC.	02/08/2001	02/23/2001	03/09/2001	03/15/2001
ITC-214-20010208-00111	Y	LIGHTRADE, INC.	02/08/2001	02/09/2001	02/09/2001	02/09/2001

4 . Method : Analysis of FCC Filing Records

- Three Periods of Analysis (Jan 2001 – Apr 2022)
 1. Jan 2001 – Dec 2010 : China's Entry into the U.S. Market
 2. Jan 2011 – Apr 2020 : China Mobile's Application and Rejection
 3. Apr 2020 – Apr 2022 : Revoking Chinese Companies' Licenses
- Application Review & **Post-Approval Review.**
- Compare the first two informal periods with the third formalized period to clarify **What is New for Team Telecom Review.**

January 2001 – December 2010 : China's Entry into the U.S. Market

As Chinese companies entered the U.S. market after 2001, combined with the establishment of the Executive Branch review, the response to Chinese companies became stricter.

Jan 2001 – Dec 2010 : ① Application Review

- **DHS** Participation and Leadership – **34 / 3237** Applications

Grant Year	Applicant Name	Mitigation Agreements	Executive Branch in Mitigation Agreements	Grant Year	Applicant Name	Mitigation Agreements	Executive Branch in Mitigation Agreements
2001	China Telecom	×	×	2008	Intelsat USA	NSA *	DOJ, FBI
	Reach	NSA *	DOJ, FBI		Ekofon	LOA	DOJ, DHS
2002	China Telecom	×	×		Pacific Networks Corp.	LOA	DHS, DOJ
	China Unicom	×	×		Cablemas	LOA	DHS
	China Unicom	×	×	Horizon	NSA *	DOJ, DHS	
2004	Tata Communications	NSA	DOJ, DHS, FBI	Pacific Networks Corp.	LOA	DHS, DOJ	
2006	Intelsat USA	LOA	DOJ, DHS, FBI	2009	FastIPCalls	LOA	DOJ, DHS
	BTI America	LOA	DOJ, DHS, FBI		ComNet	LOA	DHS, DOJ
	Belgacom	LOA	DOJ, DHS, FBI		WX	LOA	DOJ, DHS
	T-Mobile USA	NSA *	DOJ, FBI		Inmarsat Group	NSA *	DOJ, DHS
2007	Reach	NSA *	DOJ, FBI		ACT	LOA	DHS, DOJ
	Del Castillo	LOA	DOJ, DHS, FBI		2010	Stanacard	LOA
	Redes Modernas	LOA	DOJ, DHS, FBI	GTI		LOA	DOJ
	Sage VOIP	LOA	DOJ, DHS, FBI	VIZADA		NSA *	-
	JuBe	LOA	DOJ, DHS, FBI	Comsat		NSA *	-
	Space Net	LOA	DOJ, DHS, FBI	Cable & Wireless		LOA	DHS
	RebTel Services	LOA	DOJ, DHS, FBI	Hibernia Atlantic		LOA	DHS, DOD,DOJ
	Air Channel	LOA	DOJ, DHS, FBI	Alrus		LOA	DOJ, DHS
	Zed Telecom	LOA	DHS, DOJ, FBI	OPT		NSA *	DHS,DOJ

LOA : Letters of Assurance, NSA : National Security Agreements

*Diversion of another license's mitigation agreement

Jan 2001 – Dec 2010 : ② Post-Approval Review

- The DHS renegotiated to enter into an agreement for **China Telecom's** licenses approved **without agreements**.

	Applicant Name	Grant Year	Mitigation Agreements
1	China Telecom	2001	LOA (2007 Signed)
2	China Telecom	2002	LOA (2007 Signed)
3	China Unicom	2002	×
4	China Unicom	2002	×
5	ComNet	2009	LOA
6	Pacific Networks	2009	LOA

- The Executive Branch could not renegotiate the agreement **unless the applicant filed a new application** (Abbot, 2013).

January 2011 – April 2020 : China Mobile's Application and Rejection

In addition to China's economic threats, the Executive Branch became increasingly concerned about cyber threats to national security.

Jan 2011 – Apr 2020 : ① Application Review

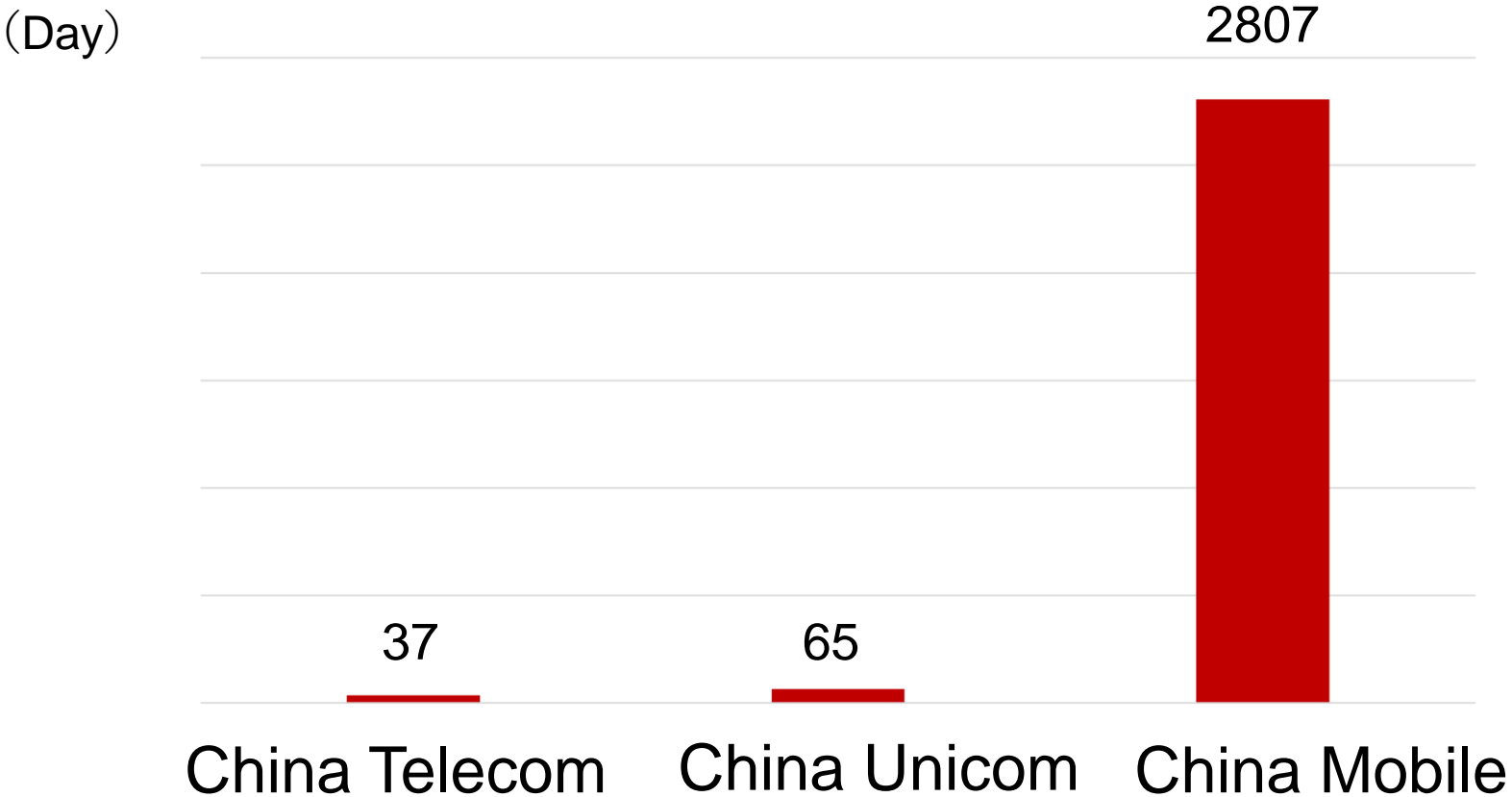
- The **DOJ & FBI** Leadership — **80 / 978** Applications with Agreements

Grant Year	Applicant Name	Mitigation Agreements	Executive Branch in Mitigation Agreements	Grant Year	Applicant Name	Mitigation Agreements	Executive Branch in Mitigation Agreements	Grant Year	Applicant Name	Mitigation Agreements	Executive Branch in Mitigation Agreements
2011	Rules Telecomm	LOA	DOJ	2014	Quickly Phone USA	LOA	DOJ, FBI	2015	Five9	LOA	FBI
	Antel USA	LOA	DOJ		iTellum	LOA	DOJ		Dharm	LOA	DOJ
	Homeland Phone	LOA	DOJ		Telediga	LOA	DOJ		US Matrix Telecommunications	LOA	DOJ
	IP To Go	NSA *	DOJ		Altex	LOA	DOJ		US Telephone & Telegraph	LOA	DOJ
2012	Communications Rey	LOA	DOJ		Flock FZ-LLC	LOA	DOJ	2016	Reliance	LOA	DOJ
	T-Mobile USA	NSA *	DOJ, FBI, DHS		3GTY	LOA	DOJ, FBI		Tampnet Inc.	LOA	DOJ
	GSH	LOA	DOJ		First Technology Development	LOA	DOJ, FBI		Telecom Services Network	LOA	DOJ, FBI
	Electrosoft Services	LOA	DOJ		VoxVision	LOA	DOJ, FBI		Telkom USA	NSA	DOJ
	Bright Packet	LOA	DOJ		KOL	LOA	DOJ, FBI		iTalk Mobile	NSA	DOJ
2013	Voiamo US	LOA	DOJ		Yatango	LOA	DOJ, FBI	2017	IP Network America	LOA	DOJ
	Itsoftel	LOA	DOJ	iTalk24	LOA	DOJ, FBI	HIGHCOMM		LOA	DOJ	
	TI Sparkle North America	LOA	DOJ	COMMKONEKT	LOA	FBI	Moxtel		LOA	DOJ	
	Glentel Corp.	LOA *	DOJ, FBI, DHS	Speed Telco	LOA	DOJ	Swisstek Telnet		LOA	DOJ	
	Cohere Communications	LOA	DOJ	Netuno	LOA	DOJ	Cyan Security USA		LOA	DOJ	
	Advanced Voice Technologies	LOA	DOJ	US Voicecom	LOA	DOJ	TX Voice Wholesale		LOA	DOJ	
	Ocean Technology	LOA	DOJ	One Allied Fund	LOA	FBI	TvF Cloud		LOA	DOJ	
	42COM	LOA	DOJ	Sheng Li	LOA	FBI	Lexitel		LOA	DOJ	
	Telefonica Digita	LOA	DOJ	AMERICA NET	LOA	FBI	NYXCOMM		LOA	DOJ	
	Moontius	LOA	DOJ	SHUF	LOA	FBI	MATCHCOM		LOA	DOJ	
2014	TELEDIREK	LOA	DOJ, DHS	Routetrader	LOA	FBI	2018	Zero Technologies	LOA	DOJ	
	Voice Trader	LOA	DOJ	ALCALLER	LOA	FBI		Ztar Mobile	LOA	DOJ	
	amaysim	LOA	DOJ	Nuvetel	LOA	DOJ		VRT USA	LOA	DOJ	
	TWare Connect	LOA	DOJ	011Now Technologies	LOA	FBI		Rebtel Networks	LOA	DOJ	
	Angel Americas	LOA	DOJ	Emsitel	LOA	FBI		eKaleo	LOA	DOJ	
2014	Angel Mobile	LOA	DOJ, FBI	emveno	LOA	DOJ, FBI	2019	Neutral Networks USA	LOA	DOJ	
				Vista Latina	LOA	FBI		SORACOM	LOA	DOJ	
				My Fi	LOA	FBI					

Jan 2011 – Apr 2020 : ① Application Review

- Sep 2011 – China Mobile filed for Section 214 License
- July 2018 – Team Telecom recommended FCC to **Deny**

Review period for applications by Chinese companies



Jan 2011 – Apr 2020 : ② Post-Approval Review

- From **as early as 2012**, we observed that Team Telecom started to confirm the existing licenses.
- Revoked **with the Mitigation Agreement** or Surrendered

	Applicant Name	Grant Year	Mitigation Agreements	Last Action Year	Last Action		Applicant Name	Grant Year	Mitigation Agreements	Last Action Year	LastAction
1	Intelsat USA	2006	NSA *	2016	Surrendered	16	Alrus	2010	LOA	2018	Surrendered
2	Belgacom	2006	LOA	2018	Surrendered	17	IP To Go	2011	LOA	2016	Revoked
3	Redes Modernas	2007	LOA	2016	Revoked	18	GSH	2012	LOA	2014	Surrendered
4	Sage VOIP	2007	LOA	2014	Revoked	19	Ocean Technology	2013	LOA	2016	Revoked
5	JuBe	2007	LOA	2016	Revoked	20	42COM	2013	LOA	2019	Surrendered
6	Space Net	2007	LOA	2018	Revoked	21	Telefonica Digita	2013	LOA	2018	Surrendered
7	Air Channel	2007	LOA	2018	Revoked	22	Angel Americas	2013	LOA	2019	Revoked
8	Zed Telecom	2007	LOA	2018	Surrendered	23	TELEDIREK	2014	LOA	2018	Surrendered
9	Intelsat USA	2008	NSA*	2019	Surrendered	24	amaysim	2014	LOA	2015	Surrendered
10	Cablemas	2008	LOA	2019	Revoked	25	Angel Mobile	2014	LOA	2019	Revoked
11	Horizon	2009	NSA	2016	Surrendered	26	Altex	2014	LOA	2017	Surrendered
12	FastIPCalls	2009	LOA	2019	Surrendered	27	Speed Telco	2014	LOA	2016	Surrendered
13	WX	2009	LOA	2018	Revoked	28	Routetrader	2015	LOA	2018	Surrendered
14	ACT	2009	LOA	2014	Revoked	29	Swisstok Telnet	2017	LOA	2018	Surrendered
15	Hibernia Atlantic	2010	LOA	2015	Surrendered	30	TvF Cloud	2017	LOA	2018	Surrendered

April 2020 to April 2022 : Revoking Chinese Companies' Licenses

On April 4, 2020, President Trump signed Executive Order 13913 to formalize both Team Telecom and its process.

Apr 2020 to Apr 2022 : ① Application Review

- DOJ as Chair of New Team Telecom – 17 /76 Applications

Grant Year	Applicant Name	Mitigation Agreements	Executive Branch in Mitigation Agreements
2020	AFRIX Telecom	LOA	DOJ
	Pivotel America	LOA	DOJ
	Reach Mobile	LOA	DOJ
	FIDELITEL	LOA	DOJ
	Itel Networks	LOA	DOJ
	Tadiran Telecom	LOA	DOJ
	Liberty	LOA	DOJ
	ARIA TEL	LOA	DOJ
	Telecom2Go	LOA	DOJ
2021	Plintron	LOA	DOJ
	Wuru Telecom	LOA	DOJ
	Marcatel	LOA	DOJ
	InfiCloud	LOA	DOJ
	Interoute	LOA	DOJ,DHS
2022	Oktacom	LOA	DOJ
	Rakuten	LOA	DOJ
	Vocus Group	LOA	DOJ

Apr 2020 to Apr 2022 : ② Post-Approval Review

- Revoked **without a mitigation agreement** given national security.

	Applicant Name	Grant Year	Mitigation Agreements	Last Action Year	Last Action
1	China Telecom	2001	LOA	2021	Revoked
2	China Telecom	2002	LOA	2021	Revoked
3	China Unicom	2002	×	2022	Revoked
4	China Unicom	2002	×	2022	Revoked
5	ComNet	2009	LOA	2022	Revoked
6	Pacific Networks	2009	LOA	2022	Revoked

- This was the first time a license without arrangement at the time of approval was **retroactively revoked for security reasons**.

Apr 2020 to Apr 2022 : ② Post-Approval Review

- **Voluntary Surrender** with the Mitigation Agreement

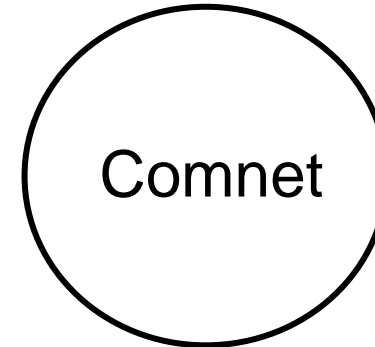
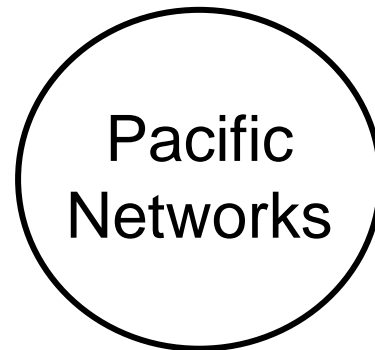
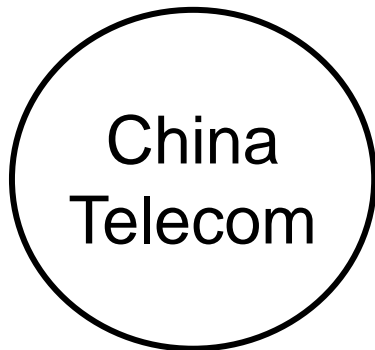
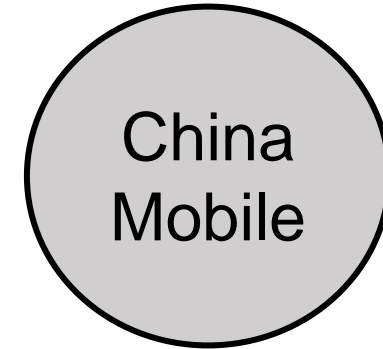
	Applicant Name	Grant Year	Mitigation Agreements	Last Action Year	Last Action		Applicant Name	Grant Year	Mitigation Agreements	Last Action Year	LastAction
1	Rebtel Services	2007	LOA	2020	Surrendered	22	011Now Technologies	2015	LOA	2020	Voluntary Surrender
2	Ekofon	2008	LOA	2020	Surrendered	23	Emsitel	2015	LOA	2021	Voluntary Surrender
3	Rules Telecomm	2011	LOA	2020	Voluntary Surrender	24	emveno	2015	LOA	2020	Voluntary Surrender
4	Homeland Phone	2011	LOA	2020	Voluntary Surrender	25	Vista Latina	2015	LOA	2020	Voluntary Surrender
5	Voiamo US	2012	LOA	2020	Voluntary Surrender	26	MyFi	2015	LOA	2020	Surrendered
6	Itsoftel	2013	LOA	2020	Voluntary Surrender	27	Dharm	2015	LOA	2020	Voluntary Surrender
7	Moontius	2013	LOA	2020	Voluntary Surrender	28	US Telephone & Telegraph	2015	LOA	2020	Voluntary Surrender
8	Voice Trader	2014	LOA	2021	Voluntary Surrender	29	Telecom Services Network	2016	LOA	2021	Voluntary Surrender
9	TWare Connect	2014	LOA	2020	Surrendered	30	iTalk Mobile	2016	NSA	2021	Surrendered
10	iTellum	2014	LOA	2020	Voluntary Surrender	31	IP Network America	2016	LOA	2021	Voluntary Surrender
11	Telediga	2014	LOA	2020	Voluntary Surrender	32	Moxtel	2017	LOA	2020	Voluntary Surrender
12	Flock FZ-LLC	2014	LOA	2021	Surrendered	33	Cyan Security USA	2017	LOA	2020	Surrendered
13	3GTY	2014	LOA	2021	Voluntary Surrender	34	TX Voice Wholesale	2017	LOA	2020	Surrendered
14	VoxVision	2014	LOA	2020	Voluntary Surrender	35	Lexitel	2017	LOA	2020	Voluntary Surrender
15	KOL	2014	LOA	2020	Voluntary Surrender	36	NYXCOMM	2018	LOA	2022	Surrendered
16	Yatango	2014	LOA	2020	Voluntary Surrender	37	MATCHCOM	2018	LOA	2020	Voluntary Surrender
17	COMMKONEKT	2014	LOA	2022	Voluntary Surrender	38	Zero Technologies	2018	LOA	2020	Voluntary Surrender
18	Netuno	2015	LOA	2020	Voluntary Surrender	39	Ztar Mobile, Inc.	2018	LOA	2022	Voluntary Surrender
19	US Voicecom	2015	LOA	2020	Voluntary Surrender	40	VRT USA	2018	LOA	2022	Surrendered
20	AMERICA NET	2015	LOA	2022	Voluntary Surrender	41	eKaleo	2019	LOA	2020	Voluntary Surrender
21	SHUF	2015	LOA	2022	Voluntary Surrender	42	Wuru Telecom	2021	LOA	2022	Surrendered

5 .Result : **Terminate existing licenses** more easily

Type		Informal		Formalized
Grant Year		January 2001 - January 2010	January 2011 - April 2020	April 2020 - April 2022
Lead Agency		DHS from 2006	DOJ, FBI	DOJ as Chair of Team Telecom
Mitigation Agreement		34 Licenses	80 Licenses	17 Licenses
Surrendered	With Mitigation Agreement	2 Licenses	19 Licenses	11 Licenses
Revoked	With Mitigation Agreement	0	12 Licenses	4 Licenses
Revoked	Without Mitigation Agreement	0	0	2 Licenses
Voluntary Surrender	With Mitigation Agreement	0	0	31 Licenses
Expired (Surrendered + Revoked + Voluntary Surrender)		2 Licenses	31 Licenses	48 Licenses

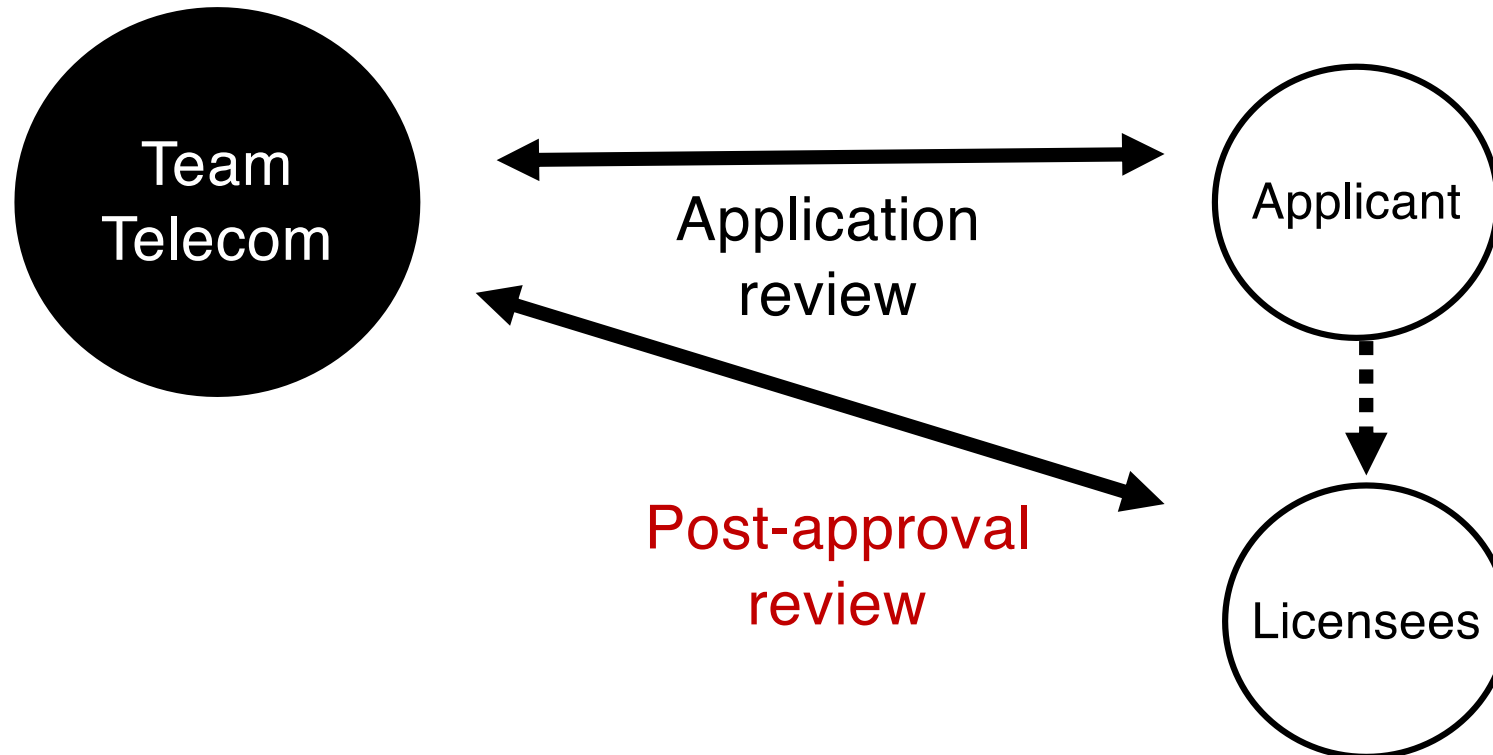
6 .Discussion : China Mobile & China Unicom

- September 1, 2011
 - China Mobile filed for Section 214 license
- May 10, 2019
 - FCC issued Order Denying Application



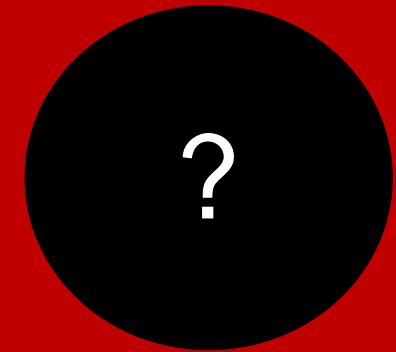
6 .Discussion : China Mobile & China Unicom

- When Team Telecom faced with limitations in dealing with Chinese licenses, They recognized **the need for and cost of post-approval review.**



7 .Conclusion:

Increased Risks of Retroactive Revocation



7 .Conclusion: Increased Risks of Retroactive Revocation

- From April 2020, the licensing review results did not guarantee a future outcome **for non-national licensees.**
- Recent literature analyzed the Executive Branch review at the time of **approval as a point of concern.**
- However, this study reveals **that post-approval reviews** were identified as a new concern going forward.



Thank you!

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