



Federal Communications Commission
Washington, D.C. 20554

February 7, 2024

DA 24-107

By First Class and Certified Mail, Return Receipt Requested

Robert M. Leon
Director, Engineering/IT
Unified Worldwide Transport, LLC
1620 26th Street, Suite 2040 N
Santa Monica, CA 90404

Re: Potential Reclamation of Unified Worldwide Transport, LLC's International Signaling Point Code, 3-181-7 (Los Angeles, CA)

Dear Mr. Leon:

By this letter, the Telecommunications and Analysis Division of the FCC's Office of International Affairs notifies you of our intent to reclaim the above-captioned International Signaling Point Code (ISPC), which was provisionally assigned to Unified Worldwide Transport, LLC (Unified Worldwide) on June 4, 2004.¹ We will take this action unless you respond to this letter within 30 days, by **March 8, 2024**, and indicate whether Unified Worldwide 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.708.² 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."³ 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.⁴

¹ Unified Worldwide Transport, LLC, File No. SPC-NEW-20040530-00019 (filed May 30, 2004) (Unified Worldwide ISPC Application). Letter from Cathy Hsu, Policy Division, International Bureau, FCC to Robert Leon, Director, Engineering/IT, Unified Worldwide Transport, LLC (June 4, 2004) (*Unified Worldwide ISPC Grant Letter*).

² 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).

³ *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.").

⁴ ITU-T Recommendation Q.708 at 6.

Pursuant to ITU-T Recommendation Q.708, the Commission required Unified Worldwide to make several certifications in its application for the ISPC. *First*, Unified Worldwide certified that the “[c]ode assignments held in excess of 12 months without implementation must be returned to this Administrator for reassignment.”⁵ In its letter granting the provisional assignment of ISPC 3-181-7 to Unified Worldwide on June 4, 2004, the Policy Division (Division) of the International Bureau⁶ required Unified Worldwide to inform the Division of the implementation date of the code within one year, by June 4, 2005.⁷ *Second*, Unified Worldwide certified “[it is] aware that all ISPC assignments are provisional and that nobody has a property right in [an] ISPC [and it is] aware that the Commission may take an assigned ISPC and reassign it to another person.”⁸ *Third*, Unified Worldwide was subject to the annual traffic and revenue reporting requirements at the time of its ISPC assignment. Unified Worldwide certified that its failure to file this report would “be interpreted as inactive operation and could, therefore, result in the loss of the carrier’s point code assignment.”⁹ Despite these certifications, we have no record that Unified Worldwide informed the Division of the date the code was implemented or filed any International Traffic and Revenue Reports for the years 2004-2015.¹⁰

Since April 2020, Division staff have made several attempts to contact Unified Worldwide to ascertain whether it is using its assigned ISPC. On April 2, 2020 and March 11, 2022, the staff sent inquiries to the email addresses on file, which were returned as undeliverable.¹¹ On March 9, 2022, the staff called Unified Worldwide’s phone number on record and determined that it is no longer in service or

⁵ Unified Worldwide ISPC Application, Question 4.

⁶ The Policy Division was renamed the Telecommunications and Analysis Division in 2015 as part of the reorganization of the FCC’s International Bureau. See FCC News Release, International Bureau Reorganization, (Dec. 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.

⁷ *Unified Worldwide Grant Letter* at 2.

⁸ Unified Worldwide ISPC Application, Question 5.

⁹ *Id.*, Question 6.

¹⁰ 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 Unified Worldwide, were required to file the final traffic and revenue data for calendar year 2015.

¹¹ Email from Arthur Lechtman, Attorney-Advisor, Telecommunications and Analysis Division, International Bureau, to Robert Leon, Unified Worldwide Transport, LLC (rob@uwttlc.com) and to Teresa Baer, Latham & Watkins (teresa.baer@lw.com) (Apr. 2, 2020, 4:26 PM); Return email from Mail Delivery Subsystem to Arthur Lechtman, Attorney-Advisor, Telecommunications and Analysis Division, International Bureau (Apr. 2, 2020, 4:26 PM); Email from Arthur Lechtman, Attorney-Advisor, Telecommunications and Analysis Division, International Bureau, to Randy Sherman, Unified Worldwide Transport, LLC (randy@uwttlc.com) (Mar. 11, 2022, 10:51 AM); Return email from Mail Delivery Subsystem to Arthur Lechtman, Attorney-Advisor, Telecommunications and Analysis Division, International Bureau (Mar. 11, 2022, 2:56 PM and Mar. 16, 2022, 11:52 AM). These emails are reprinted in the Attachment below.

disconnected.¹² The FCC 499 Filer Database indicates that Unified Worldwide has not been active since April 5, 2006 and that its account was “closed because the administrator could not contact the filer.”¹³ Finally, according to California’s Secretary of State, Business Search website, Unified Worldwide has been suspended, and inactive since August 1, 2011.¹⁴ Based on our inability to contact a representative of Unified Worldwide, our records, Unified Worldwide’s apparent failure to file any International Traffic and Revenue Reports for 2004-2015, and the records of California’s Secretary of State, we believe Unified Worldwide may no longer be providing service and is no longer using its assigned ISPC.

We request that you respond to this letter by **March 8, 2024**, and indicate the date the code was implemented and describe the current use of Unified Worldwide’s ISPC (3-181-7).¹⁵ A failure to respond to this letter will serve as confirmation that Unified Worldwide 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, we will reclaim the ISPC (3-181-7) and immediately thereafter make the code available for reassignment consistent with the terms of the ITU-T Recommendation Q.708.

If you have any questions, please contact me at (202) 418-7370 or Francis.Gutierrez@fcc.gov or my colleague Arthur Lechtman at (202) 418-1465 or Arthur.Lechtman@fcc.gov.

Sincerely,

/Francis Gutierrez/
Francis Gutierrez
Deputy Chief
Telecommunications and Analysis Division
Office of International Affairs

cc:

By First Class and Certified Mail, Return Receipt Requested

Randy Sherman, President
Betty Howard, Chief Executive Officer
Ann Yanick, Chairwoman
1620 26th Street, Suite 2040 N
Santa Monica, CA 90404

¹² Staff called the following telephone number: (310) 264-4760.

¹³ Unified Worldwide Transport, LLC, FCC Form 499 Filer Database, <https://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=825818> (last visited Feb. 1, 2024).

¹⁴ See California, Secretary of State, Business Search, <https://www.sos.ca.gov/business-programs/business-entities/cbs-search-tips> (last visited Feb. 1, 2024).

¹⁵ We are addressing this letter to the most recent contacts and addresses of record provided by Unified Worldwide.

Teresa Baer
Latham & Watkins LLP
555 11th Street N.W. Suite 1000
Washington, DC 20004-1304

Attachment*Email Exchange 1*

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

From: Mail Delivery Subsystem <MAILER-DAEMON@mx0a-0024ed01.pphosted.com>
 Sent: Thursday, April 2, 2020 4:26 PM
 To: prvs=136195d29c=arthur.lechtman@fcc.gov
 Subject: Returned mail: see transcript for details

The original message was received at Thu, 2 Apr 2020 13:26:08 -0700 from m0196534.pops.net [127.0.0.1]

----- The following addresses had permanent fatal errors ----- <teresa.baer@lw.com>
 (reason: 550 #5.1.0 Address rejected.) <rob@uwtlc.com>
 (reason: 550 Host unknown)

----- Transcript of session follows ----- ... while talking to mx1.lw.com.:
 >>> RCPT To:<teresa.baer@lw.com>
 <<< 550 #5.1.0 Address rejected.
 550 5.1.1 <teresa.baer@lw.com>... User unknown
 >>> DATA
 <<< 503 #5.5.1 RCPT first
 550 5.1.2 <rob@uwtlc.com>... Host unknown (Name server: uwtlc.com.: host not found)

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From: Arthur Lechtman <Arthur.Lechtman@fcc.gov>
Sent: Thursday, April 2, 2020 4:26 PM
To: rob@uwtlc.com; teresa.baer@lw.com
Cc: Francis Gutierrez <Francis.Gutierrez@fcc.gov>; Stacey Ashton <Stacey.Ashton@fcc.gov>
Subject: International signaling point code, Unified Worldwide Transport, LLC

Hello,

I am writing to inquire whether Unified Worldwide Transport, LLC is still using the international signaling point code that it was assigned in 2004 (3-181-7 Los Angeles, CA). 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

Email Exchange 2

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

From: Mail Delivery Subsystem <MAILER-DAEMON@mx0a-0024ed01.pphosted.com>
 Sent: Wednesday, March 16, 2022 11:52 AM

To: prvs=40693f728e=arthur.lechtman@fcc.gov
Subject: [EXTERNAL]: Returned mail: see transcript for details

The original message was received at Fri, 11 Mar 2022 15:51:02 GMT from m0102173.pops.net [127.0.0.1]

----- The following addresses had permanent fatal errors ----- <randy@uwtllc.com>

----- Transcript of session follows ----- <randy@uwtllc.com>... Deferred: Connection timed out with uwtllc.com.
Message could not be delivered for 5 days Message will be deleted from queue

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

From: Mail Delivery Subsystem <MAILER-DAEMON@mx0a-0024ed01.pphosted.com>
Sent: Friday, March 11, 2022 2:56 PM
To: prvs=40693f728e=arthur.lechtman@fcc.gov
Subject: [EXTERNAL]: Warning: could not send message for past 4 hours

** THIS IS A WARNING MESSAGE ONLY **
** YOU DO NOT NEED TO RESEND YOUR MESSAGE **

The original message was received at Fri, 11 Mar 2022 15:51:02 GMT from m0102173.pops.net [127.0.0.1]

----- Transcript of session follows ----- <randy@uwtllc.com>... Deferred: Connection timed out with uwtllc.com.
Warning: message still undelivered after 4 hours Will keep trying until message is 5 days old

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From: Arthur Lechtman <Arthur.Lechtman@fcc.gov>
Sent: Friday, March 11, 2022 10:51 AM
To: randy@uwtllc.com
Cc: Francis Gutierrez <Francis.Gutierrez@fcc.gov>; Stacey Ashton <Stacey.Ashton@fcc.gov>
Subject: International signaling point code, Unified Worldwide Transport, LLC

Hello Mr. Sherman,

I am writing to inquire whether Unified Worldwide Transport, LLC is still using the international signaling point code that it was assigned in 2004 (3-181-7 Los Angeles, CA). Please let me know by email or call me at the number below if you have any questions. Thank you,

Arthur Lechtman
International Bureau/TAD
Federal Communications Commission
202.418.1465