

**DESCRIPTION OF *PRO FORMA* TRANSFER OF CONTROL
AND PUBLIC INTEREST STATEMENT**

This application is filed in connection with the planned conversion as of December 31, 2019 of Securus Technologies, Inc. (“Securus”), the immediate parent corporation of CellBlox Acquisitions, LLC (“Licensee” or “CellBlox”), from a Delaware corporation to a Delaware limited liability company (the “Conversion”). The Conversion will occur through the execution and filing of a Certificate of Conversion and Certificate of Formation as prescribed under Delaware law and will not involve any merger or other action that will extinguish the existence of Securus. Pre- and post-Conversion ownership structure charts for Licensee are attached. To the extent that such a change in form of the business entity by the immediate parent corporation of Licensee is considered by the Commission to be a *pro forma* transfer of control of Licensee, approval is sought for the resulting *pro forma* transfer of control of all Special Temporary Authorities for Experimental Services (“STAs”) held by CellBlox.¹

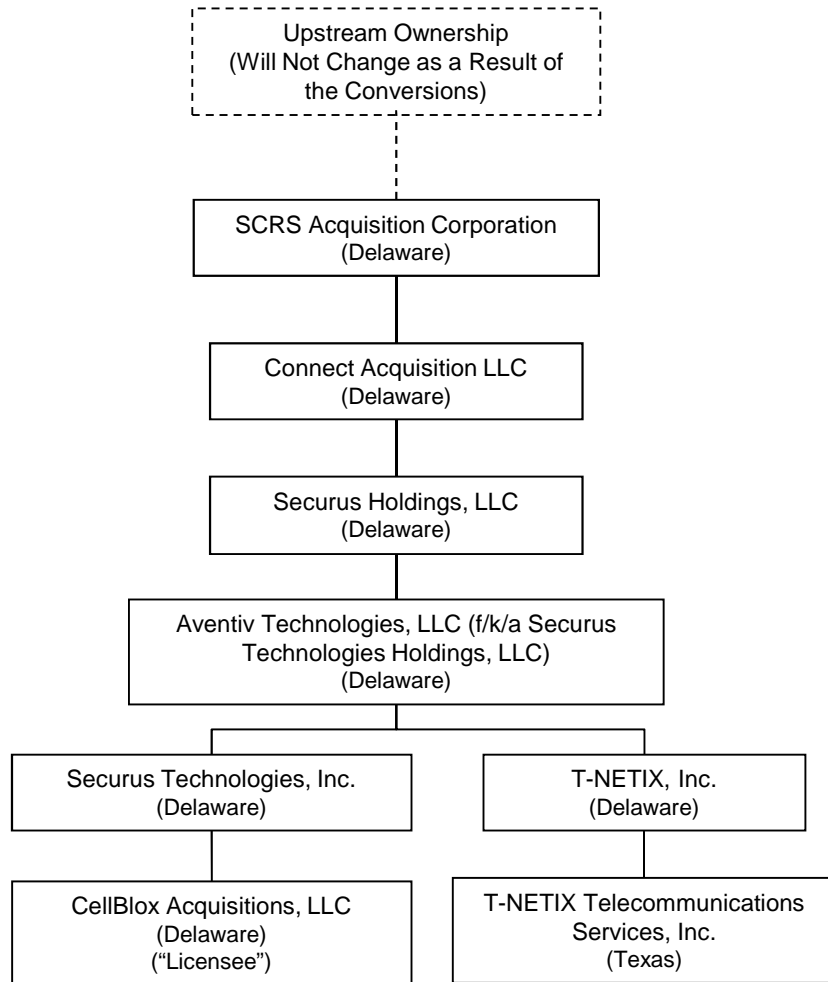
Licensee is a wholly-owned subsidiary of Securus, which is in turn a wholly-owned, indirect subsidiary of SCRS Acquisition Corporation. Since after the Conversion Licensee will continue to be a wholly-owned subsidiary of Securus, the resulting transfer of control is *pro forma* in nature.

The Conversion is being implemented for tax and other business reasons. Further, the Conversion will not affect the ongoing and safe operation of the facilities and services provided by Licensee. Upon completion of the Conversion, Licensee will remain technically, managerially, and financially qualified to provide the wireless services authorized by the STAs. At the same time, the Conversion will have no adverse impact on the customers of Licensee. Immediately following the Conversion, Licensee will continue to provide services to the same extent and at the same rates and on the same terms and conditions as are currently in effect. Since the Conversion is occurring at the parent company level, the Conversion will be wholly transparent to customers. The Conversion does not require a waiver of any of the Commission’s rules. Consequently, prompt action granting this application will serve the public interest, convenience, and necessity.

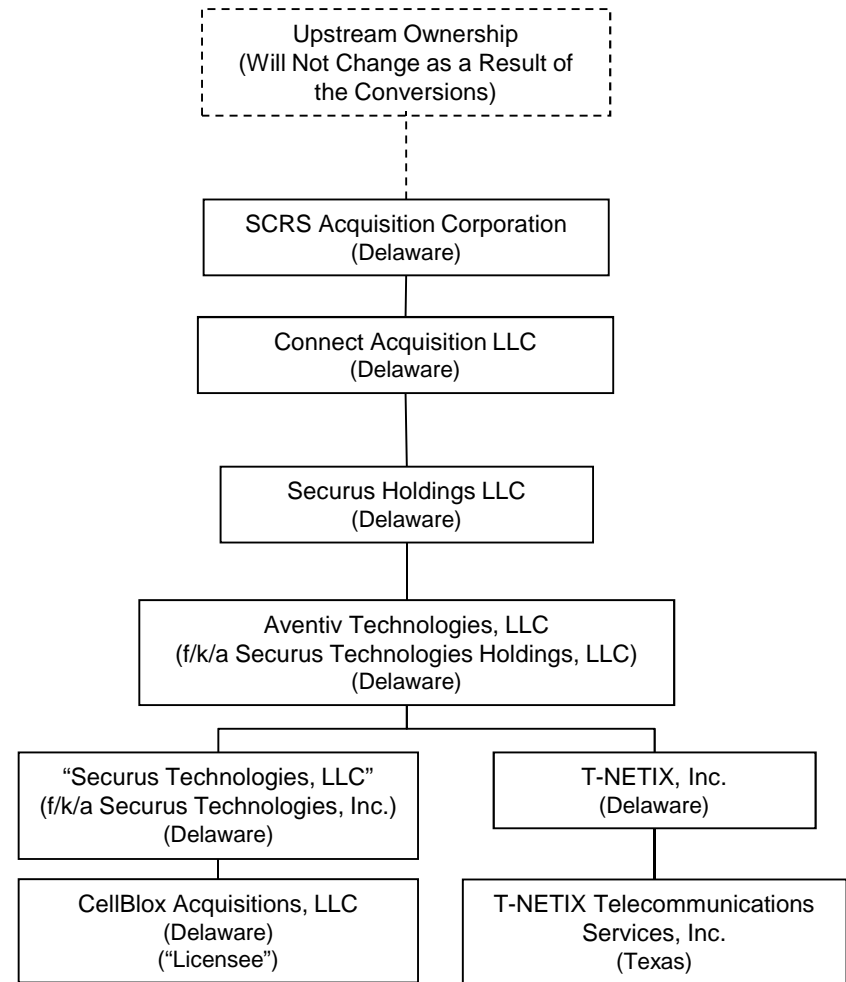
To the extent the Conversion is considered by the Commission to be a *pro forma* transfer of control, the Conversion does involve the *pro forma* transfer of control of CellBlox’s spectrum leases for which prior Commission approval is required. An application seeking approval for the *pro forma* transfer of control of CellBlox with respect to its *de facto* transfer spectrum leases was filed on November 22, 2019 and assigned ULS File No. 0008877373 (the “Wireless Application”). Licensee will notify the Office of Engineering and Technology when the Wireless Application is approved.

¹ For Call Sign WP9XQB, the application is pending coordination. However, we are including it in this application in anticipation of approval and any approval of the *pro forma* transfer is of course contingent on such underlying approval.

Pre-Conversion Corporate Structure of Licensee



Post-Conversion Corporate Structure of Licensee



Unless indicated all ownership percentages are 100%.