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August 16, 2010

VIA IBFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554
Attn: International Bureau

Re: Notification of the *Pro Forma* Assignment of the International Section 214 Authorizations of Norlight Telecommunications, Inc. to Norlight, Inc. (IB File Nos. ITC-214-19960826-00406 (Old File No. ITC-96-481), ITC-214-19960826-00407 (Old File No. ITC-97-478), and ITC-214-19940224-00080 (Old File No. ITC-94-179))

Dear Ms. Dortch:

Norlight Telecommunications, Inc. (“NTI”) and Norlight, Inc. (“Norlight”) (together, the “Parties”), by their undersigned counsel and pursuant to 47 C.F.R. § 63.03(d)(2), notify the Commission of the *pro forma* intracompany assignment of the international Section 214 authorizations of NTI to Norlight, which was completed on August 31, 2007. The *pro forma* assignment was undertaken shortly after the Parties’ direct parent company, Q-Comm Corporation (“Q-Comm”), acquired NTI.¹ As part of the integration of NTI into the Q-Comm corporate family, Q-Comm determined that international voice services of the Q-Comm operating subsidiaries would be provided by Norlight, and that NTI would focus primarily on providing intrastate and interstate high speed data services to enterprise customers. The Parties file this notification in order to formally effectuate the *pro forma* assignment of NTI’s international Section 214 authorizations to Norlight and emphasize that this intracorporate *pro forma* assignment did not change the ultimate ownership or control of the Parties.

¹ See IB File No. ITC-T/C-20061204-00545. Q-Comm completed the acquisition of NTI on February 26, 2007.

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Description of the Parties

Q-Comm Corporation is a privately held Nevada corporation with an executive office at 8829 Bond Street, Overland Park, Kansas 66214. Q-Comm provides telecommunications services through wholly-owned operating subsidiaries, including NTI and Norlight. Q-Comm and its operating subsidiaries have an executive office at 8829 Bond Street, Overland Park, KS 66214 and have an operations office at 3701 Communications Way, Evansville, IN 47715.

NTI primarily provides high-speed data services to large enterprise customers and school districts. NTI also provides certain private transport services to carrier customers, including certain of its affiliates.

Norlight provides a wide range of voice, data, and managed services to small and medium-sized businesses and residential customers in Indiana, Kentucky, Tennessee and Wisconsin.

Description of the Pro Forma Assignment

As described above, following Q-Comm's acquisition of NTI in 2007, Q-Comm undertook a review of the services offered by its various operating subsidiaries. As part of that review, Q-Comm determined that international services would be provided by Norlight. As a result, NTI assigned its international Section 214 authorizations to Norlight on August 31, 2007. It has recently come to the Parties' attention that they never formally completed that *pro forma* assignment by filing the required notification pursuant to the Commission's *pro forma* assignment procedures. This filing is intended to rectify that omission and therefore to complete the *pro forma* assignment.

Information Required by Section 63.24(f)(2)

As required by Section 63.24(f)(2), the Parties provides the following information required by 63.18(a) through (d) and (h):

Section 63.18(a): Name, address and telephone number of the Parties:

Norlight Telecommunications, Inc.	FRN 0002704682
Norlight, Inc.	FRN 0007345754
8829 Bond St.	
Overland Park, KS 66214	
913-754-3339 (Tel)	

Section 63.18(b): The Parties are organized as follows:

NTI is a Wisconsin corporation.

Norlight is a Kentucky corporation.

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Section 63.18(c): Correspondence concerning this filing should be sent to the Parties counsel:

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with a copy to:

John Chuang
Corporate Counsel
Q-Comm Corporation
8829 Bond St.
Overland Park, KS 66214
913-754-3339 (Tel)
812-759-1647 (Fax)
john.chuang@qservicesco.com

Section 63.18(d): The Parties hold the following International and Domestic Section 214 Authorizations:

NTI is authorized to provide (1) global facilities-based services pursuant to international Section 214 authorization granted in IB File No. ITC-214-19960826-00406 (Old File No. ITC-96-481); (2) global resale services pursuant to international Section 214 authorization granted in IB File No. ITC-214-19960826-00407 (Old File No. ITC-97-478); and (3) facilities-based private line, point-to-point or point-to-multipoint voice and data services between the United State and Canada pursuant to international Section 214 authorization granted in IB File No. ITC-214-19940224-00080 (Old File No. ITC-94-179).² NTI is authorized to provide interstate service by virtue of blanket domestic Section 214 authorization pursuant to 47 C.F.R. § 64.01.

² These international Section 214 authorizations were granted in the name of Norlight, Inc., which name was subsequently changed to Norlight Telecommunications, Inc.

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Norlight does not formally hold international Section 214 authorization, but is seeking to have the international Section 214 authorizations of NTI listed above formally assigned to it. Norlight is authorized to provide interstate service by virtue of blanket domestic Section 214 authorization pursuant to 47 C.F.R. § 64.01.

Sections 63.18(h): Please see Attachment A for the ownership information of the Parties.

The Parties certify that the intracorporate assignment of the international Section 214 authorization of NTI to Norlight was *pro forma* in nature and that, together with all previous *pro forma* transactions, did not result in a change in the actual controlling party of the Parties.

This notification letter is being filed electronically via MyIBFS. Please direct any questions to the undersigned.

Respectfully submitted,



Jean L. Kiddoo
Brett P. Ferenchak

Counsel for
Norlight Telecommunications, Inc. and Norlight, Inc.

Attachment

ATTACHMENT A

Ownership

The following entities hold, directly or indirectly a 10% or greater interest¹ in the Parties as calculated pursuant to the Commission ownership attribution rules for international telecommunications carriers:

- 1) The following entity holds a ten percent (10%) or greater direct interest in **Norlight Telecommunications, Inc.** and **Norlight, Inc.**:

Name: Q-Comm Corporation ("Q-Comm")
Address: 8829 Bond St.
Overland Park, KS 66214
Citizenship: U.S.
Interest Held: 100% (directly held in NTI and Norlight)
Principal Business: Holding Company

- 2) The following entity currently holds a ten percent (10%) or greater direct interest in **Q-Comm**:

Name: Al Cinelli
Address: 1300 Gulf Blvd
South Padre Island, TX 78957
Citizenship: U.S.
% Interest: 50.51% (directly in Q-Comm)
Principal Business: Individual

Name: John Cinelli
Address: 9910 Oglesby Dr.
Evansville, IN 47720
% Interest: 11.66% (directly in Q-Comm)
Citizenship: U.S.
Principal Business: Individual

¹ Unless otherwise indicated, the ownership interests provided herein represent both equity and voting interests.

Name: Duke Communications Holdings, Inc. (“Duke Holdings”)
Address: 526 South Church St.
Charlotte, NC 28202-1904
% Interest: 32.59% (directly in Q-Comm)
Citizenship: U.S.
Principal Business: Holding Company

Name: Cinergy Investments, Inc. (“CII”)
Address: 139 East 4th St.
Cincinnati, OH 45201
Ownership Interest: 32.59% (indirectly in Q-Comm through Duke Holdings)
Citizenship: U.S.
Principal Business: Holding Company

Name: Cinergy Corp. (“Cinergy”)
Address: 139 East 4th St.
Cincinnati, OH 45201
Ownership Interest: 32.59% (indirectly in Q-Comm through CII)
Citizenship: U.S.
Principal Business: Energy

Name: Duke Energy Corporation (“Duke Energy”)
Address: 526 South Church St.
Charlotte, NC 28202-1904
Ownership Interest: 32.59% (indirectly in Q-Comm through Cinergy)
Citizenship: U.S.
Principal Business: Energy

Duke Energy is a widely held public corporation and, to the Parties’ knowledge, no shareholder of Duke Energy Corporation has a 10% or greater interest in Q-Comm (calculated using the FCC’s attribution rules). In addition and to the Parties’ knowledge, Duke Energy does not hold a 10% direct or interest in any entity holding a domestic or international Section 214 authorization except for Duke Energy’s subsidiary DukeNet Communications, Inc. (FRN 0007736853).

None of the Parties have interlocking directorates with a foreign carrier.

VERIFICATION

I, John Chuang, am Corporate Counsel of Q Services Company, a subsidiary of Q-Comm Corporation (“Q-Comm”) and affiliate of Kentucky Data Link, Inc. (“KDL”), Norlight Telecommunications, Inc. (“NTI”) and Norlight, Inc. (“Norlight”) (Q-Comm, KDL, NTI and Norlight collectively, the “Company”). I am authorized to represent Q-Comm, KDL, NTI and Norlight to make this verification on their behalf. The statements in the foregoing document relating to the Company and their affiliates are true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct. Dated this 16th day of August, 2010.



John Chuang
Corporate Counsel
Q Services Company