

Notification of Pro Forma Assignment of Section 214 Authority

From Leading Edge Communications, LLC to Leading Edge Communications, Inc.

**ATTACHMENT 1**

Answer to Question 10:

*Section 63.18(c).* For both the assignor and assignee, the Commission should address correspondence regarding this application to:

Kristopher E. Twomey  
Law Office of Kristopher E. Twomey, P.C.  
1725 I Street, NW, Suite 300  
Washington, D.C. 20006  
Phone: (202) 681-1850  
Fax: (202) 517-9175  
kris@lokt.net  
*Counsel for Leading Edge Communications, LLC and Leading Edge Communications, Inc.*

with copies to:

June McKenzie  
Leading Edge Communications, Inc.  
Vice President, Regulatory Affairs  
2275 Corporate Circle, Suite 220  
Henderson, Nevada 89074  
Phone: 702 297-6900  
Fax: 702 938-4139  
jmckenzie@leadingedge.com

*Section 63.18(d).* The Commission previously has authorized Leading Edge Communications, LLC to provide global resale telecommunications services in the authorization that is the subject of this pro forma assignment notification. See FCC File ITC-214-20010213-00070 (March 14, 2001).

Answer to Question 11:

David J. Chadwick owns 100% of each entity involved in this transaction. He is an American citizen. His address:

President  
Leading Edge Communications, Inc.  
2275 Corporate Circle, Suite 220  
Henderson, Nevada 89074

Answer to Question 13:

On April 18, 2011, Leading Edge Communications, LLC consummated a *pro forma* assignment to Leading Edge Communications, Inc. of its International Section 214 Authorization to provide global resale services and related common carrier operations.<sup>1</sup> Leading Edge Communications, LLC, federal registration number 0017839077, received its Section 214 authorization in docket ITC-214-20010213-00070 on March 14, 2001 for global authority to (1) operate as a facilities-based carrier pursuant to the terms and conditions of Section 63.18 (e)(1) of the Commission's Rules, 47 C.F.R. 63.18 (e)(1), to all foreign points as authorized by the Commission and (2) operates as a resale carrier pursuant to the terms and conditions of Section 63.18 (e)(2) of the Commission's Rules to all foreign points as authorized by the Commission. 47 C.F.R. 63.18 (e)(2). Leading Edge Communications, Inc., federal registration number 0020762134, a Delaware corporation, controlled the assets of Leading Edge Communications, LLC.

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<sup>1</sup> As appropriate, Leading Edge Communications, Inc. requests a waiver of the Commission's requirement that an International 214 authorization holder notify the FCC of a pro forma assignment of authorization within 30 days after the assignment is completed. 47 C.F.R. § 63.24(f)(2). Leading Edge Communications, Inc.'s failure to file this notification within the specified timeframe was inadvertent. Leading Edge Communications, Inc. apologizes for any inconvenience resulting from its failure to file this notification in a timely manner.

Management formed a new entity, also named Leading Edge Communications, Inc. in Nevada on April 12, 2011. On that same day, Leading Edge Communications, Inc. (the Delaware corporation) filed articles of merger with the Delaware Division of Corporations merging the assets of the Delaware corporation into the Nevada corporation. This resulted in the merger of the assets of Leading Edge Communications, LLC into the new Nevada corporation. On April 18, 2011, the articles of merger were filed with the Nevada Secretary of State resulting in a single surviving Nevada corporation with the name of Leading Edge Communications, Inc.

Leading Edge Communications, Inc. intends to continue providing international telecommunications services for the operations transferred from Leading Edge Communications, LLC for global or limited global resale service.

This is a pro forma assignment because, prior to April 18, 2011, Leading Edge Communications, LLC and Leading Edge Communications, Inc. were independently incorporated entities under 100% common ownership and control by their president, David Chadwick. As of April 18, 2011, Leading Edge Communications, LLC merged into Leading Edge Communications, Inc. Thus, the assignment of the international 214 authorization and common carrier operations is “an assignment from a corporation to a corporation owned or controlled by the assignor stockholders without substantial change in their interests.” 47 C.F.R. § 63.24(d), Note 2. Therefore, Leading Edge Communications, Inc. certifies in the attachment to this letter that the assignment is pro forma as defined by Section 63.24(a) of the Commission’s rules and has not resulted in a

change of the authorization's ultimate control. Leading Edge Communications, Inc. retained ultimate control of the international Section 214 authorization both before and after the consummation of the assignment. As such, no change in ownership has occurred.