

**D. ETHAN JEFFREY**  
Email: dej@murphyking.com

March 5, 2013

VIA EMAIL TO:

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sumita.mukhoty@fcc.gov  
david.krech@fcc.gov

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Notification of *Pro Forma* Assignment of Section 214 Authorization from Trans National Communications International, Inc. (FRN 0004-3378-46) to Trans National Communications International, Inc., Debtor in Possession.

Dear Ms. Dortch:

Trans National Communications International, Inc. ("TNCI") (FRN 0004-3378-46), by undersigned counsel, notifies the Commission of its *pro forma* assignment to Trans National Communications International, Inc. Debtor in Possession ("TNCI DIP" and, together with TNCI, the "Parties") resulting from TNCI's Chapter 11 bankruptcy filing. TNCI's Chapter 11 bankruptcy case is currently pending and open in the United States Bankruptcy Court for the District of Massachusetts. The case number is 11-19595 and the case has been assigned to Judge William C. Hillman. TNCI's bankruptcy filing did not change the ultimate owners of TNCI.

**Description of TNCI**

TNCI is a Delaware corporation with principal offices located at 2 Charlesgate West Boston, MA 02215. TNCI is authorized to provide global facilities-based and resale services pursuant to authority granted in File No. ITC-20420030414-00187. TNCI also holds authority to provide communications services in 48 states and the District of Columbia.

TNCI DIP is the Debtor in Possession pursuant to Section 1101 of the United States Bankruptcy Code (the "Bankruptcy Code"). Pursuant to 11 U.S.C. §§ 1107, 1108, TNCI DIP has succeeded in interest to all of the assets and authorizations of TNCI and is authorized to operate the business of TNCI during the bankruptcy proceeding.

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### **Designated Contacts**

Questions or any correspondence, or other materials pertaining to this filing should be directed to the following:

D. Ethan Jeffrey  
Murphy & King, P.C.  
One Beacon Street  
Boston, MA 02108  
(617) 423-0400 (Phone)  
(617) 423-0498 (Fax)  
[dej@murphyking.com](mailto:dej@murphyking.com)

### **Description of the Pro Forma Assignment**

#### ANSWER TO QUESTION 13

By this filing, the Parties notify the Commission that TNCI filed for Chapter 11 bankruptcy protection on October 9, 2011. The Parties did not recognize that filing for Chapter 11 constituted a *pro forma* assignment pursuant to Sections 63.03(d)(2) and 63.24(g) of the Commission's Rules, 47 C.F.R. §§ 63.03(d)(2), 63.24(g), requiring notification to the Commission within 30 days after the event causing the assignment. Notice of TNCI's bankruptcy filing was provided to the FCC pursuant to applicable bankruptcy rules of procedure.

At all times, ownership of TNCI did not change. Therefore, following the assignment to TNCI DIP, along with all previous internal corporate restructurings, TNCI continued to be ultimately owned and controlled by the same entity.

### **Information Required by Sections 63.03(d)(2) & 63.24(f)(2)**

As required by Sections 63.03(d)(2) and 63.24(f)(2), the Parties provide the following information required by Sections 63.04(a)(1) through (a)(4) and 63.19(a) through (d) and (h) with respect to TNCI (the assignor and assignee).

- (a) Sections 63.04(a)(1) and 63.18(a): Name, address and telephone number of TNCI (same as that of TNCI DIP):

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Trans National Communications International, Inc.  
2 Charlesgate West  
Boston, MA 02215  
617-369-1059 (Phone)  
617-369-1195 (Fax)  
[erobinson@tncii.com](mailto:erobinson@tncii.com)

- (b) Sections 63.04(a)(2) and 63.18(b): TNCI is a company organized under the laws of Delaware.
- (c) Sections 63.04(a)(3) and 63.18(c): Correspondence concerning this filing should be sent to the contacts listed above.
- (d) Section 63.18(d): TNCI holds international Section 214 authority to provide global facilities-based and resold services granted by the Commission in FCC File No. ITC-204-20030414-00187. TNCI is also authorized to provide interstate service by virtue of blanket domestic Section 214 authority. 47 C.F.R. § 64.01.
- (e) Sections 63.04(a)(4) and 63.18(h): The following entities hold, directly or indirectly, a ten percent (10%) or greater interest<sup>1</sup> in TNCI as calculated pursuant to the Commission ownership rules for wireline and international telecommunications carriers:

#### ANSWER TO QUESTION 11

Name: Steven P. Belkin  
Address: 8 Rocky Ledge Rd. Weston, MA 02493  
Citizenship: United States  
Principal Business: Investor  
% Interest: 100%

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

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No other person or entity, directly or indirectly, owns or controls a ten percent (10%) or greater interest in TNCI

No entity that owns or controls ten percent (10%) or more of TNCI has an interlocking directorate with any foreign carrier.

TNCI hereby certifies that the intra-corporate change in structure was *pro forma* and did not and will not result in a change in the actual controlling party.

\* \* \* \*

An original and five (5) copies of this notification letter are enclosed for filing with the Wireline Competition Bureau. Please return the extra copy in the envelope provided. This notification letter is also being filed via MyIBFS. Please direct any questions to the undersigned.

Respectfully submitted,  
TRANS NATIONAL COMMUNICATIONS INTERNATIONAL, INC.  
By its attorneys

  
\_\_\_\_\_  
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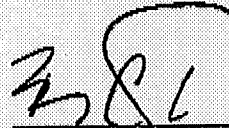
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### VERIFICATION

I, Brian Twomey, hereby declare that:

1. I am Chief Executive Officer of Trans National Communications International, Inc.
2. I am authorized to make this Verification on behalf of Trans National Communications International, Inc. and Trans National Communications International, Inc. Debtor in Possession.
3. The contents of the foregoing filing are true and accurate to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this  
\_\_\_\_\_ day of February, 2013.



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Brian Twomey  
Chief Executive Officer  
Trans National Communications  
International, Inc.