

**Answers to Questions 10, 11 and 13**

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BorderCOMM Partners, LP (“BorderCOMM”) holds authority under Section 214 of the Communications Act (File No. ITC-214-19940120-00019) to provide private line resale services, to lease and operate facilities for provision of non-interconnected international private line services, and to use its leased and operated facilities to provide authorized telecommunications services, including switched voice and data as well as private line services, between the United States and Mexico.

As part of a reorganization of its business, BorderCOMM is assigning its Section 214 authorization to its affiliated company Southwestern Caruth Management, Inc. (“SCM”). This assignment does not change the ultimate ownership or control of the authorization, as the current interest holders in BorderCOMM will hold identical interests in the Section 214 authorization through SCM, as outlined in the following section. Accordingly, the assignment is *pro forma* in nature. See 47 C.F.R. § 63.24, note 2.

BorderCOMM does not hold any other Section 214 authorizations. Other than the Section 214 authorization being acquired from BorderCOMM, SCM does not hold any Section 214 authorizations. (47 C.F.R. § 63.18(d))

Any communications regarding this application may be directed to the individuals identified as the contacts for each party in the application Form 214. (47 C.F.R. § 63.18(c))

**Answer to Question 11**

The following individuals and entities hold 10 percent (10%) or greater ownership interests in SCM; these interests are identical to the interests these parties previously held in BorderCOMM:

Thomas J. Spackman, Jr.  
4316 Bryan Street  
Dallas, TX 75204  
Citizenship: USA  
Principal Business: Telecommunications  
Ownership Interest: 23.95%

Bobby Lutz  
17300 Dallas Parkway, #3050  
Dallas, TX 75248  
Citizenship: USA  
Principal Business: Telecommunications  
Ownership Interest: 16.81%

Vs Comm Interest, L.P.  
411 North Akard Street  
Suite 900  
Dallas, TX 75201  
Jurisdiction: USA  
Principal Business: Telecommunications Investment  
Ownership Interest: 12.18%