Morgan Lewis

Morgan, Lewis & Bockius LLP 2020 K Street NW Washington, DC 20006-1806 Tel. +1.202.373.6000 Fax: +1.202.373.6001 www.morganlewis.com

Brett P. Ferenchak

Of Counsel +1.202.373.6697 brett.ferenchak@morganlewis.com

August 21, 2015

Via IBFS

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554 Attn: International Bureau

Re: Notification Regarding Change in Corporate Form Resulting in *Pro Forma* Assignment of the International Section 214 Authorization of ACN Communication Services, Inc.

Dear Ms. Dortch:

ACN Communication Services, LLC ("Assignee"), by undersigned counsel and pursuant to 47 C.F.R. § 63.24(f), notifies the Commission that, effective July 24, 2015, it converted to a Michigan limited liability company from a Michigan corporation resulting in the assignment of the International Section 214 Authorization of ACN Communication Services, Inc. ("Assigner") (Assignee and Assignor together, the "Company") to Assignee.¹

Information Required by Section 63.24(f)(2)

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

 $[\]frac{1}{1}$ The Company notes that the conversion was completed by filing Articles of Conversion and did not entail a merger or other transaction that extinguished the existence of Assignor. As such, Assignee is the same entity as Assignor, except that it is a limited liability company rather than a corporation.

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Sections 63.18(a): Name, address and telephone number of the Company:

ACN Communication Services, LLC (Assignee) ACN Communication Services, Inc. (Assignor) 1000 Progress Place Concord, NC 28025 Tel: 877-226-1010

Sections 63.18(b): Organization of the Company:

Assignor was a Michigan corporation prior to its conversion. As a result of the conversion, Assignee is a Michigan limited liability company

<u>Section 63.18(c)</u>: Correspondence concerning this filing should be sent to the Company's counsel:

Eric J. Branfman Brett P. Ferenchak Morgan, Lewis & Bockius LLP 2020 K Street, N.W. Washington, DC 20006-1806 202-373-6000 (Tel) 202-373-6001 (Fax) eric.branfman@morganlewis.com brett.ferenchak@morganlewis.com

<u>Section 63.18(d)</u>: The Company holds international Section 214 authority to provide global facilities-based and resale services granted in IB File No. ITC-214-2000203-00052.

Sections 63.18(h): See Attachment 1 for the ownership of the Company.

The Company certifies that the conversion was *pro forma* and that, together with all previous *pro forma* transactions, did not result in a change in the actual controlling party of the Company.

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

Respectfully submitted,

/s/ Brett P. Ferenchak

Eric J. Branfman Brett P. Ferenchak

Counsel for the Company

ATTACHMENT 1

Answer to Question 11 - Section 63.18(h) Ownership Information

The following entities currently hold, directly or indirectly, a 10% or greater interest¹ in

the Company (ACN Communication Services, LLC) as calculated pursuant to the Commission

ownership attribution rules for international telecommunications carriers:

a) <u>Ownership of the Company</u>

The following entities hold a ten percent (10%) or greater, direct or indirect, interest in **ACN Communication Services, LLC**:

Name:	LKN Communications, Inc. ("LKN Comm")		
Address:	1000 Progress Place		
	Concord, NC 28025		
Citizenship:	U.S. (Michigan)		
Principal Business:	Direct Selling of Telecommunications and Other Services		
% Interest:	100% (directly in the Company)		
Name:	LKN Global Holdings, Inc. ("LKN GH")		
Address:	1000 Progress Place		
	Concord, NC 28025		
Citizenship:	U.S. (Delaware)		
Principal Business:	Holding Company		
% Interest:	100% (indirectly in the Company as the 100% owner of		
	LKN Comm)		

 $^{^{\}perp}$ Unless otherwise indicated, the ownership interests provided herein represent both equity and voting interests.

a) <u>Ownership of the LKN Global Holdings, Inc.</u>

Name: Address: Citizenship: Principal Business: % Interest:	Dave Stevanovski c/o LKN Global Holdings, Inc. 1000 Progress Place Concord, NC 28025 Attn: Legal Department U.S. Individual Approx. 20.8% (indirectly in LKN GH as the sole trustee or a co-trustee of trusts that directly or indirectly own LKN GH) ²
Name: Address:	Lynn Stevanovski c/o LKN Global Holdings, Inc. 1000 Progress Place Concord, NC 28025 Attn: Legal Department
Citizenship: Principal Business: % Interest:	U.S. Individual Approx. 15.8% (indirectly in LKN GH as the sole trustee or a co-trustee of trusts that directly or indirectly own LKN $GH)^{3}$
Name: Address:	Robert Stevanovski c/o LKN Global Holdings, Inc. 1000 Progress Place Concord, NC 28025 Attn: Legal Department
Citizenship: Principal Business: % Interest:	U.S. Individual Approx. 19.2% (indirectly in LKN GH as the sole trustee of trusts and as the manager of a limited liability company that directly or indirectly own LKN GH) ^{4}

 $[\]frac{2}{2}$ None of those trusts individually own 10 percent or more of LKN GH.

 $[\]frac{3}{2}$ None of those trusts individually own 10 percent or more of LKN GH.

⁴ One of those trusts (a U.S. entity) directly owns approximately 15.6 percent of LKN GH. The limited liability company indirectly owns less than 1 percent of LKN GH.

Name: Address: Citizenship:	Greg Provenzano c/o LKN Global Holdings, Inc. 1000 Progress Place Concord, NC 28025 Attn: Legal Department U.S.
Principal Business: % Interest:	Individual Approx. 16.2% (indirectly in LKN GH as the sole trustee of a trust and the manager of a limited liability company that directly or indirectly own LKN GH) ⁵
Name: Address:	Michael Cupisz c/o LKN Global Holdings, Inc. 1000 Progress Place Concord, NC 28025 Attn: Legal Department
Citizenship: Principal Business: % Interest:	U.S. Individual Approx. 14.9% (indirectly in LKN GH as the sole trustee of trusts that directly or indirectly own LKN GH) ⁶
Name: Address:	Tony Cupisz c/o LKN Global Holdings, Inc. 1000 Progress Place Concord, NC 28025 Attn: Legal Department
Citizenship: Principal Business: % Interest:	U.S. Individual Approx. 17.3% (indirectly in LKN GH as the sole trustee of trusts that directly or indirectly own LKN GH) ²

To the Company's knowledge, no other person or entity, directly or indirectly, owns or controls a 10% or greater interest in Company through LKN GH.

 $[\]frac{5}{10}$ Neither the trust nor limited liability company individually owns 10 percent or more of LKN GH.

 $[\]frac{6}{10}$ One of those trusts (a U.S. entity) owns approximately 11.3 percent of LKN GH.

 $[\]frac{7}{2}$ One of those trusts (a U.S. entity) owns approximately 11.3 percent of LKN GH.

Answer to Question 12 - Section 63.18(h) Interlocking Directorates

The Company has interlocking directorates with the following affiliated non-dominant

foreign carriers:

Country Where Service	Foreign Carrier	
Provided ⁸	Affiliate Name	Type of License(s)
Austria	ACN Communications Services GmbH	General Authorization for Public Communications Services
Belgium	ACN Communications Belgium BVBA	Authorization for Carrier Pre-Selection Services
Canada	All Communications Network of Canada Co.	 (1) Basic International Telecommunications Services (BITS) License (2) Non-Facilities-Based Digital Subscriber Line
		Providers Registration (3) Resellers of Telecommunications Services
		Registration
		(4) Resellers of High Speed Retail Internet Service Registration
Czech Republic	ACN Communications Czech Republic s.r.o.	Authorization for Line Rental Services
Denmark	ACN Danmark A/S	Not applicable (No licensing requirements)
Finland	ACN Communications Finland Oy	Not applicable (No licensing requirements)
France	ACN Communications	General Authorization for Electronic
	France SAS	Communications and Authorization for Mobile Services
Germany	ACN Communications GmbH	General Authorization for Public Communication Services
Hungary	ACN Communications Hungary Kft.	Authorization for Fixed Line and Carrier Pre- Selection Services
Ireland	All Communications Network (ACN) Ireland Limited	General Authorization for Public Communications Services and Authorization for Line Rental Services
Italy	ACN Italia Communications Srl	General Authorization for Public Communication Services

 $[\]frac{8}{2}$ Each of the countries listed is a WTO Member.

Country Where		
Service Provided ⁸	Foreign Carrier Affiliate Name	Type of License(s)
Korea (South)	ACN Korea, Inc.	Special Category Telecommunications Service #2
Netherlands	ACN Europe BV	General Authorization for Public Communication Services
Norway	ACN Norway AS	General Authorization for Public Communication Services
Poland	ACN Communications Polska sp.z.o.o.	General Authorization for Public Communication Services
Portugal	Nacacomunik - Serviços de Telecomunicações, Lda.	Authorization for the Resale of Voice Telephony Services
Spain	ACN Marketing y Servicios de Telecomunicaciones SL	Authorization for the Resale of Voice Telephony Services and Authorization for Broadband Services
Sweden	ACN Communications Sweden AB	General Authorization for Public Communication Services
Switzerland	ACN Communications Schweiz GmbH	General Authorization for Public Communication Services
United Kingdom	ACN European Services Ltd.	Not applicable (No licensing requirements)

One or more of the following officers and directors of the Company are hold similar

positions with the foreign carriers listed above:

Directors:

Dave Stevanovski Charles Barker

Officers:

Dave Stevanovsk, President Rick Dunn, Treasurer Paul Gagnier, Secretary

Answer to Question 13 - Description of Assignment

Effective July 24, 2015, Assignor converted from a Michigan corporation to a Michigan limited liability company resulting in the assignment of Assignor's International Section 214 Authorization to Assignee. The conversion was completed by filing an Articles of Conversion and did not entail a merger or other transaction that extinguished the existence of Assignor.⁹ As such, Assignee is the same entity as Assignor, except that it is a limited liability company rather than a corporation.

⁹ See Mich. Comp. Laws § 450.4709(3)(f) & (h) (stating that "The surviving business organization is considered to be the same entity that existed before the conversion and is considered to be organized on the date that the domestic corporation was originally incorporated. . . . [T]he domestic corporation is not required to wind up its affairs or pay its liabilities and distribute its assets on account of the conversion, and the conversion does not constitute a dissolution of the domestic corporation." (emphasis added)).

VERIFICATION

I, Paul O. Gagnier, state that I am Secretary of ACN Communication Services, LLC (the "Company"); that I am authorized to make this Verification on behalf of the Company; that the foregoing filing was prepared under my direction and supervision; and that the contents are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this

20_ day of August, 2015.

_ & Paul O. Gagnier Secretary ACN Communication Services, LLC

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