

Pursuant to Section 63.24(d) of the Commission's Rules (47 C.F.R. § 63.24(d)), Public Interest Network Services, Inc. ("Public Interest") hereby informs the Commission of the *pro forma* assignment of its International Section 214 Authorization, File No. ITC-214-20110131-00021, to its direct parent, CornerStone Telephone Company, LLC ("CornerStone"), effective as of November 17, 2015. Concurrently with this notification, CornerStone is also filing a notification pursuant to Section 63.21 of the Commission's Rules (47 C.F.R. § 63.21(h)), that Public Interest will provide international services through its parent's newly-assigned authorization. Accordingly, both CornerStone and Public Interest will be providing international services under the same authorization.

CornerStone respectfully informs the Commission of its recent discovery that it has been providing international services without authorization. In the course of a due diligence review in contemplation of a significant corporate transaction, CornerStone became aware that it had no Section 214 international authorization with respect to its minimal international telecommunications services (constituting, on average, less than one percent (1%) of its annual telecommunications revenues). CornerStone believes that it may have initiated international services as early as 2002 as an adjunct direct dial service to customers, but, unfortunately, overlooked its concomitant obligation to seek prior authorization to so do. CornerStone notes, however, that international revenues have consistently been reported on its annual FCC Form 499 filings.

To correct this oversight as quickly as possible, CornerStone has caused its direct subsidiary, Public Service, to assign its existing authorization up the corporate ladder (and share the authorization through the notification provisions of Section 63.21(h) of the Commission's Rules). Accordingly, CornerStone believes that it has taken appropriate remedial steps to protect its customers from any inconvenience or loss of service.

**Answer to Question 10**, providing contact information pursuant to Section 63.18(c):

**Transferor: Public Interest Network, Services, Inc.** (a New York corporation)

Richard W. Drake, Jr.  
VP of Finance  
2 Third Street  
Suite 303  
Troy, NY 12180  
Telephone: 518.272.1018  
Email: rdrake@cstel.com

**Transferee: CornerStone Telephone Company LLC** (a New York limited liability company)

Richard W. Drake, Jr.  
VP of Finance  
2 Third Street  
Suite 303  
Troy, NY 12180  
Telephone: 518.272.1018  
Email: rdrake@cstel.com

**Copies of all correspondence, notices, and inquiries should also be addressed to:**

Sylvia Lesse  
Communications Advisory Counsel, LLC  
5151 Wisconsin Avenue NW  
Suite 311  
Washington, DC 20016  
Telephone: (202) 333-5273  
Email: sylvia@independent-tel.com

**Answer to Question 10**, providing information regarding previous Section 214 authorizations pursuant to Section 63.18(d):

Transferee Public Interest holds Section 214 authority to provide international and domestic telecommunications services. *See* File No. ITC-214-20110131-00021 and 47 C.F.R. § 63.01. An indirect subsidiary of Transferor CornerStone, Richmond Connections, Inc. d/b/a Richmond Newtorx, holds Section 214 authority to provide international and domestic telecommunications services. *See* File No. ITC-214-19991019-00660 and 47 C.F.R. § 63.01.

**Answer to Question 11**, providing ownership information pursuant to Section 63.18(h):

**Transferor (owners of Public Interest):**

Public Interest is a wholly-owned subsidiary of Transferee Cornerstone.

**Transferee (owners of 10% or more of CornerStone):**

<u>Name &amp; Address</u>	<u>Equity</u>	<u>Citizenship</u>	<u>Principal Business</u>
Daniel Yamin 2 Third Street Suite 303 Troy NY 12180	16.40%	USA	Telecom
Donald Walsh 2 Third Street Suite 303 Troy NY 12180	16.40%	USA	Telecom
Stanley D. Russell 2 Third Street Suite 303 Troy NY 12180	16.40%	USA	Telecom
Jack A. Overton, Jr.  2 Third Street Suite 303 Troy NY 12180	12.50%	USA	Telecom
Wendy Doerr 2 Third Street Suite 303 Troy NY 12180	12.50%	USA	Retired

**Answer to Question 13**, providing information regarding the means of transfer:

On November 17, 2015, Public Interest assigned its International Section 214 Authorization, File No. ITC-214-20110131-00021, to its direct parent, CornerStone.