

CAHILL GORDON & REINDEL LLP

SUITE 950

1990 K STREET, N.W.

WASHINGTON, D.C. 20006-1181

EIGHTY PINE STREET
NEW YORK, N.Y. 10005-1702
(212) 701-3000
FAX: (212) 269-5420

TELEPHONE (202) 862-8900
FACSIMILE (202) 862-8958

AUGUSTINE HOUSE
6A AUSTIN FRIARS
LONDON, ENGLAND EC2N 2HA
(011) 44.20.7920.9800
FAX: (011) 44.20.7920.9825

ANGELA F. COLLINS | 202-862-8930 | acollins@cahill.com

April 7, 2016

Via IBFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: IBFS File No. ITC-ASG-20160202-00051

Dear Secretary Dortch:

On February 2, 2016, Birch Communications, Inc. (“Birch”) and Primus Telecommunications, Inc., Debtor-in-Possession (“Primus”) filed a Joint Application (the “Application”) requesting authority from the Commission to assign and/or transfer control of Primus customers to Birch (the “Transaction”). Pursuant to a request from International Bureau staff, Birch files this supplement to clarify the ownership of Birch. In previous applications filed by Birch, Birch indicated that Mr. R. Kirby Godsey held a portion of his ownership interest in Birch Communications Holdings, Inc. (“Birch Holdings”) through his individual holdings and through the R. Kirby Godsey 2008 Grantor Retained Annuity Trust. That trust is no longer in place, and Mr. Godsey holds his ownership interest in Birch Holdings only through his individual holdings.

Please contact the undersigned if you have questions regarding this matter.

Respectfully submitted,



Angela F. Collins
Counsel for Birch Communications, Inc.