

**Application for Consent to Transfer of Control  
of International 214 Authorized Carrier**

**I. INTRODUCTION**

The Estate of Martin J. Tibbitts (“Transferee” or “Applicant”) hereby requests approval of the Federal Communications Commission (“FCC” or “Commission”) pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, and Section 63.24 of the Commission’s Rules, 47 C.F.R. § 63.24, to the involuntary international 214 transfer of control of LCR Telecommunications, LLC, a Michigan limited liability company, (“Licensee”) from Martin J. Tibbitts (“Transferor”).

For the reasons stated herein, Applicant respectfully submits that this Application is subject to the Commission’s “streamlined” processing rules found in Section 63.12 of the Commission’s Rules, 47 C.F.R. § 63.12, and thus prompt approval can be accomplished because there are no competitive concerns that could delay Commission approval of the transfer.

**II. DESCRIPTION OF THE TRANSACTION**

On July 20, 2018, Transferor unexpectedly passed away. The Wayne County (Michigan) Probate Court appointed Belinda G. Tibbitts as Special Personal Representative of the Estate of Martin J. Tibbitts, the Transferee in this Application, on July 26, 2018.<sup>1</sup> Transferor’s interest in Licensee has been transferred to the Estate.

Licensee no longer provides service, and accordingly Transferee is in the process of withdrawing the international 214 authorization for Licensee. Approval of the transfer serves the public interest, as the transfer has not had a negative impact on the public interest, consumers, or competition.

**III. ANSWER TO QUESTION 10**

**§ 63.18(c) – Contact Information for Transferor and Transferee:**

Cheng-yi Liu, Esq.  
Mark C. DeSantis, Esq.  
1300 N. 17th Street  
Suite 1100  
Arlington, VA 22209  
(703) 812-0478  
Legal Counsel

With a copy to:

---

<sup>1</sup> See Letters of Authority for Special Personal Representative, State of Michigan Probate Court County of Wayne, File No. 2018-840033-DE.

The Estate of Martin J. Tibbitts  
Belinda G. Tibbitts, Special Personal Representative  
714 Grand Marais Street  
Grosse Pointe, MI 48230  
(248) 353-7620

**§ 63.18(d) – Section 214 Authority**

Licensee has previously received international Section 214 authorizations to provide resold and facilities-based services.<sup>2</sup> Licensee also holds domestic 214 authority pursuant to Section 63.01 of the Commission's Rules. Transferee has not previously received international or domestic Section 214 authorizations.

**IV. ANSWER TO QUESTION 13**

A description of the transfer is provided in Section II, *supra*.

**V. REQUEST FOR STREAMLINED PROCESSING**

Applicant requests streamlined processing pursuant to Section 63.12 of the Commission's Rules, 47 C.F.R. § 63.12. Licensee is a U.S. carrier that has no affiliation with a foreign carrier in any particular country, and would presumptively be considered non-dominant for the provision of international communications services pursuant to Section 63.10(a)(1) of the Commission's rules, 47 C.F.R. § 63.10(a)(1). Licensee previously provided international service solely through the resale of an unaffiliated U.S. facilities-based carrier's international switched services (either directly or indirectly through the resale of another U.S. resale carrier's international switched services) and would also presumptively be classified as non-dominant for the provision of international service pursuant to Section 63.10(a)(4) of the Commission's rules, 47 C.F.R. § 63.10(a)(4). Accordingly, Applicant qualifies for the streamlined processing procedures under Sections 63.12(a) & (b) of the Commission's rules, 47 C.F.R. §§ 63.12(a) & (b).

---

<sup>2</sup> See File No. ITC-214-19980313-00189.