

The instant filing is to notify the Federal Communications Commission (“Commission”) of a *pro forma* assignment of LCR Telecommunications, LLC’s (“LCR” or “Company”) customer base. LCR is a Michigan limited liability company with international 214 authorization, File No. ITC-214-19980313-00189.

This *pro forma* assignment occurred as the result of a reorganization among entities owned and controlled by the same stockholders without substantial change in their interests. LCR is wholly owned by the Estate of Martin J. Tibbitts. Belinda G. Tibbitts is the appointed Personal Representative of the Estate. She is also the President of LCR. Likewise, Network Service Billing, Inc. (“NSBI”), a Nevada corporation, is wholly owned by the Estate of Martin J. Tibbitts. Belinda G. Tibbitts is the appointed Personal Representative of the Estate and the President of NSBI. Pursuant to the terms of a January 31, 2021 Asset Purchase Agreement (“APA”), LCR’s entire customer base was assigned to NSBI.

Answer to Question 10

In response to 47 C.F.R. § 63.18(c), please direct all correspondence concerning this application to the following counsel for LCR:

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In response to 47 C.F.R. § 63.18(d), LCR and NSBI have previously been authorized under Section 214 of the Act to provide Global or Limited Global Facilities-Based and Resale Services. LCR was granted its international 214 authorization on May 13, 1998.¹ NSBI was granted its international 214 authorization on August 12, 2005.² LCR and NSBI are also

¹ See File No. ITC-214-19980313-00189. The Commission subsequently granted the involuntary transfer of control of LCR from Martin J. Tibbitts to the Estate of Martin J. Tibbitts on December 14, 2018. See *International Authorizations Granted*, Public Notice, DA No. 18-1278, (Rel. Dec. 20, 2018).

² See file No. ITC-214-20050726-00286. The Commission subsequently granted the involuntary transfer of control of NSBI from Martin J. Tibbitts to the Estate of Martin J. Tibbitts on December 14, 2018. See *International Authorizations Granted*, Public Notice, DA No. 18-1278, (Rel. Dec. 20, 2018).

authorized to provide domestic interstate service by virtue of blanket domestic Section 214 authority.³

Answers to Questions 11 and 12

Assignee, NSBI, is wholly owned by the Estate of Martin J. Tibbitts. Belinda G. Tibbitts is the appointed Personal Representative of the Estate.

| Name / Address | % Shares | Country | Principal Business |
|-------------------------------------------------------------------------------------------------------------------------------------|----------|---------------|-------------------------------|
| Estate of Martin J. Tibbitts Personal Representative: Belinda G. Tibbitts 4354 2 nd Street Pleasanton, CA 94566 | 100% | United States | Investment/Telecommunications |

The Assignee does not have any interlocking directorates with a foreign carrier.

Answer to Question 13

This *pro forma* assignment occurred in accordance with the APA. Pursuant to the APA, LCR's entire customer base was assigned to NSBI. For purposes of this notification, the APA closed on January 31, 2021. LCR and NSBI are wholly owned by the Estate of Martin J. Tibbitts. At all relevant times, Belinda G. Tibbitts has remained the Personal Representative of the Estate of Martin J. Tibbitts and the President of LCR and NSBI. She is responsible for and in control of the day-to-day operations of the both entities. Therefore, the transaction was *pro forma* in nature because the assignment constitutes an assignment from assignor to assignee "owned or controlled by the assignor stockholders without substantial change in their interests."⁴

³ See 47 C.F.R. § 63.01.

⁴ See 47 C.F.R. § 63.24, Note 2 to Paragraph (d).