

ATTACHMENT 1

Notification of a *Pro Forma* Assignment of International Section 214 Authorization Held by International Telcom, LTD

Answer to Question 10 – Section 63.18(c)-(d):

Section 63.18(c) Information for International Telcom, Ltd.: Applicant International Telcom, Ltd. is a corporation organized under the laws of the State of Delaware.

Officer Contact Information:

Kevin Alward
Chief Executive Officer
International Telcom, Ltd.
14 Industrial Ave.
Suite 4
Mahwah, NJ 07430
Ph: (206) 479-2600
Email: Kevin.Alward@dial800.com

With a copy to:

James C. Falvey
Lawler, Metzger, Keeney & Logan, LLC
1717 K Street NW
Suite 1075
Washington, DC 20006
Ph: (202) 777-7732
Email: jfalvey@lawlermetzger.com

And to:

Leon Nowalsky
Nowalsky & Gothard, APLLC
1420 Veterans Memorial Blvd.
Metairie, LA 70005
Ph: (504) 832-1984
Email: lnowalsky@nbglaw.com

Section 63.18(d) International Telcom, Ltd. International Section 214 Authorization: International Telcom, Ltd. holds FCC 214 license ITC-214-19961031-00548 to provide global facilities-based service. This international Section 214 authorization is the subject of this *pro forma* assignment.

Answer to Question 11 – Section 63.18(h) – Direct and Indirect Ownership Interests:

The following persons and entity hold a 10% or greater direct interest in Transferee:

Name: Kevin Alward
Address: 14 Industrial Avenue, Suite 4
Mahwah, New Jersey 07430
Citizenship: U.S.
Principal Business: International telecommunications
Percent Interest: 38%

Name: Nicholas Felmlee
Address: 14 Industrial Avenue, Suite 4
Mahwah, New Jersey 07430
Citizenship: U.S.
Principal Business: International telecommunications
Percent Interest: 12%

Name: Afognak Holdings, LLC
Address: 14 Industrial Avenue, Suite 4
Mahwah, New Jersey 07430
Citizenship: U.S.
Principal Business: Holding company
Percent Interest: 50%

The following persons hold a 10% or greater direct interest in Afognak Holdings, LLC:

Name: Kevin Alward
Address: 14 Industrial Avenue, Suite 4
Mahwah, New Jersey 07430
Citizenship: U.S.
Principal Business: International telecommunications
Percent Interest: 36.5%

Name: Nicholas Felmlee
Address: 14 Industrial Avenue, Suite 4
Mahwah, New Jersey 07430
Citizenship: U.S.
Principal Business: International telecommunications
Percent Interest: 24%

Name: Jeffrey Alward
Address: 14 Industrial Avenue, Suite 4
Mahwah, New Jersey 07430

Citizenship: U.S.
Principal Business: International telecommunications
Percent Interest: 36.5%

Answer to Question 13 – Narrative Description of *Pro Forma* Assignment:

On October 19, 2017, International Telecom, Ltd. (“ITLD”) changed its corporate form from a business corporation to a limited liability company to become International Telecom, LLC (“ITLLC”). The change of corporate form did not result in any change in the ownership of ITLD. The shareholders, and their respective ownership interests in ITLD, were transferred into a corresponding ownership percentage into ITLLC without modification. The officers, directors and management in ITLD maintained their respective positions in ITLLC without alteration. This transaction is appropriately considered a *pro forma* assignment under Commission precedent and policy because there was no change in ownership interests in connection with this change of corporate form and accompanying license assignment.¹

The purpose of this filing is to notify the Commission, pursuant to 47 C.F.R. § 63.24(f) of this pro forma change in corporate form and accompanying assignment of the international Section 214 authorization (FCC 214 license ITC-214-19961031-00548) from ITLD to ITLLC. This change of corporate form was mistakenly executed without timely notifying the Commission as required under the Communications Act of 1934, as amended (the “Act”) and the Commission’s rules. ITLD deeply regrets this oversight and, once this error came to its attention, it immediately undertook preparation of this application for *nunc pro tunc* approval. Going forward, ITLD will take all necessary actions to ensure full future compliance with the Commission’s rules.

¹ See, e.g., *Applications of SoftBank Corp., Starburst II, Inc., Sprint Nextel Corporation, and Clearwire Corporation; For Consent to Transfer Control of Licenses and Authorizations; Petitions for Reconsideration of Applications of Clearwire Corporation for Pro Forma Transfer of Control, Memorandum Opinion and Order, Declaratory Ruling, and Order on Reconsideration*, 28 FCC Rcd 9642, ¶¶ 142-145 (2013).