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VIA ECFS

September 10, 2021

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

Re: Joint Application for Consent to Assign Domestic and International Section 214  
Authority from Call One Inc. to Peerless Network, Inc.; WC Docket 21-354; File No.  
ITC-ASG-20210908-00129

Dear Ms. Dortch:

On September 7, 2021, Call One Inc. (“Call One”) and Peerless Network, Inc. (“Peerless”) submitted the above-captioned application for Commission consent to the assignment of domestic and international Section 214 authority in connection with the sale of assets and customers from Call One to Peerless. This submission provides additional information regarding the Assignee, Peerless in response to a request from Wireline Competition Bureau staff.

*U.S. Telecommunications Services Provided by Affiliates of Assignee.* Peerless has a number of subsidiaries that provide domestic telecommunications services in the United States. These subsidiaries are identified in the attached chart along with the areas in which they operate. All of these entities offer originating and terminating calling services (both local and long distance), local transit, switched access, and SIP trunking services. These subsidiaries also provide VoIP services and other non-telecommunications services.

Please direct any questions or requests for further information to the undersigned counsel for Peerless.

Respectfully submitted,

/s/ Nancy J. Victory

Nancy J. Victory

cc: Dennis Johnson  
Jodie May  
David Krech  
Adrienne McNeil

**SUBSIDIARIES OF PEERLESS NETWORK, INC.  
THAT PROVIDE U.S. DOMESTIC TELECOMMUNICATIONS SERVICES**

<b>Subsidiary</b>	<b>Region of Operation</b>
Airus, Inc.	AL, AZ, CA, CO, CT, DE, DC, GA, HI, ID, IL, IN, IA, KS, KY, LA, ME, MD, MA, MI, MN, MS, MO, MT, NE, NV, NH, NJ, NM, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VT, WA, WV, WI, WY
Airus of Arkansas, Inc.	Arkansas
Airus of Florida, Inc.	Florida
Airus of New York, Inc.	New York
Airus of Virginia, Inc.	Virginia
Peerless Network of Alabama, LLC	Alabama
Peerless Network of Arizona, LLC	Arizona
Peerless Network of Arkansas, LLC	Arkansas
Peerless Network of California, LLC	California
Peerless Network of Colorado, LLC	Colorado
Peerless Network of Connecticut, LLC	Connecticut
Peerless Network of Delaware, LLC	Delaware
Peerless Network of the District of Columbia, LLC	District of Columbia
Peerless Network of Florida, LLC	Florida
Peerless Network of Georgia, LLC	Georgia
Peerless Network of Idaho, LLC	Idaho
Peerless Network of Illinois, LLC	Illinois
Peerless Network of Indiana, LLC	Indiana

<b>Subsidiary</b>	<b>Region of Operation</b>
Peerless Network of Kansas, LLC	Kansas
Peerless Network of Kentucky, LLC	Kentucky
Peerless Network of Louisiana, LLC	Louisiana
Peerless Network of Maine, LLC	Maine
Peerless Network of Maryland, LLC	Maryland
Peerless Network of Massachusetts, LLC	Massachusetts
Peerless Network of Michigan, LLC	Michigan
Peerless Network of Minnesota, LLC	Minnesota
Peerless Network of Mississippi, LLC	Mississippi
Peerless Network of Missouri, LLC	Missouri
Peerless Network of Montana, LLC	Montana
Peerless Network of Nebraska, LLC	Nebraska
Peerless Network of Nevada, LLC	Nevada
Peerless Network of New Hampshire, LLC	New Hampshire
Peerless Network of New Jersey, LLC	New Jersey
Peerless Network of New Mexico, LLC	New Mexico
Peerless Network of New York, LLC	New York
Peerless Network of North Carolina, LLC	North Carolina
Peerless Network of North Dakota, LLC	North Dakota
Peerless Network of Ohio, LLC	Ohio
Peerless Network of Oklahoma, LLC	Oklahoma

<b>Subsidiary</b>	<b>Region of Operation</b>
Peerless Network of Oregon, LLC	Oregon
Peerless Network of Pennsylvania, LLC	Pennsylvania
Peerless Network of Rhode Island, LLC	Rhode Island
Peerless Network of South Carolina, LLC	South Carolina
Peerless Network of South Dakota, LLC	South Dakota
Peerless Network of Tennessee, LLC	Tennessee
Peerless Network of Texas, LLC	Texas
Peerless Network of Utah, LLC	Utah
Peerless Network of Vermont, LLC	Vermont
Peerless Network of Virginia, LLC	Virginia
Peerless Network of Washington, LLC	Washington
Peerless Network of West Virginia, LLC	West Virginia
Peerless Network of Wisconsin, LLC	Wisconsin
Peerless Network of Wyoming, LLC	Wyoming