

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of the Joint Application of)
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PNG TELECOMMUNICATIONS, INC.)
)
)
and)
)
)

BUSINESS NETWORK LONG DISTANCE, INC.;
INTEGRATED SERVICES, INC.;
MULTILINE LONG DISTANCE, INC.;
NATIONAL ACCESS LONG DISTANCE, INC.; and
NATIONWIDE LONG DISTANCE SERVICE, INC.

WC Docket No. 23-_____

For Grant of Authority Pursuant to Section 214 of)
the Communications Act of 1934, as amended,)
to Complete a Transfer of Control of Certain)
Operating Assets, Including Customers, of)
Certain Domestic and International 214)
Licensed Carriers)
_____)

IB File No. ITC-214-2023_____

JOINT APPLICATION

I. INTRODUCTION AND REQUEST FOR STREAMLINED TREATMENT

Pursuant to Section 214 of the Communications Act of 1934, as amended (the “Act”)¹, and Sections 63.04, 63.18, and 63.24 of the Commission’s Rules², PNG Telecommunications, Inc., a company located at 8805 Governors Hill Drive, Suite 250, Cincinnati, Ohio 45349 (“PNG” or “Buyer”) and the following operating entities, located at 2000 Town Center, Suite 1900, Southfield, Michigan 48075, that share common ownership: Business Network Long Distance, Inc (“BNLD”); Integrated Services, Inc. (“ISI”); Multiline Long Distance, Inc. (“MLDI”); National Access Long Distance, Inc. (“NALD”); and Nationwide Long Distance

¹ 47 U.S.C. § 214.

² 47 C.F.R. §§ 63.04, 63.18 and 63.24.

Service, Inc. (“NLDS”) (such affiliated operating companies collectively, the “Operating Companies” or “Sellers” and collectively with PNG, “Applicants”), by and through undersigned counsel, hereby request that the Commission grant such authority as may be necessary or required to enable Applicants to consummate a transaction whereby PNG will acquire the domestic and international long distance customer bases of the Operating Companies (“Transaction”). The Operating Companies resell the long-distance services of PNG, so the Transaction will not result in any change in the underlying services any of the customers receive and the customers being transferred will continue to receive services from the same ultimate provider following the Transaction. Immediately following the proposed Transaction, customers of Operating Companies will continue to receive services under the same rates, terms and conditions as those services are currently provided.

Applicants request streamlined treatment of this Application pursuant to Sections 63.03 and 63.12 of the Commission’s Rules, 47 C.F.R. §§ 63.03 and 63.12. This Application is eligible for streamlined processing pursuant to Section 63.03(b)(2) of the Commission’s Rules because (i) immediately after the proposed Transaction, PNG (including its affiliates, as that term is defined in Section 3(1) of the Act) will have a market share in the interstate, interexchange market of less than 10 percent; (ii) the Applicants (including their affiliates) will provide competitive telephone exchange services or exchange access services exclusively in geographic areas served by a dominant local exchange carrier that is not a party to the Transaction; and (iii) neither the Applicants nor any of their affiliates are regulated as dominant with respect to any service. This Application qualifies for streamlined treatment under Section 63.12(c) of the Commission’s Rules because (i) Applicants are not affiliated with a foreign carrier and will not become affiliated with any foreign carrier as a result of the proposed

Transaction; (ii) Applicants are not affiliated with any dominant U.S. carrier whose international switched or private line services that either PNG or Operating Companies seek authority to resell, nor will PNG or Operating Companies be so affiliated post-close; and (iii) none of the other scenarios outlined in Section 63.12(c) of the Commission's Rules, 47 C.F.R. § 63.12, apply.

II. PARTIES TO THE TRANSACTION

A. Operating Companies

1. Business Network Long Distance, Inc. ("BNLD")

BNLD is a corporation formed under the laws of the State of Nevada. BNLD's corporate headquarters are located at 2000 Town Center, Suite 1900, Southfield Michigan 48075. BNLD is a switchless reseller registered to provide services in forty states. BNLD is wholly and directly owned and controlled by the Estate of Martin Tibbitts. BNLD is authorized to provide domestic, interstate service by virtue of blanket domestic 214 authority and holds international 214 authority pursuant to authority granted by the Commission in File No. ITC-214-20021216-00586.

2. Integrated Services, Inc. ("ISI")

ISI is a corporation formed under the laws of the State of Nevada. ISI's corporate headquarters are located at 2000 Town Center, Suite 1900, Southfield Michigan 48075. ISI is a switchless reseller registered to provide services in thirty-six states. ISI is wholly and directly owned and controlled by the Estate of Martin Tibbitts. ISI is authorized to provide domestic, interstate service by virtue of blanket domestic 214 authority and holds international 214 authority pursuant to authority granted by the Commission in File No. ITC-214-20060530-00292.

3. Multiline Long Distance, Inc. (“MLD”)

MLD is a corporation formed under the laws of the State of Ohio. MLD’s corporate headquarters are located at 2000 Town Center, Suite 1900, Southfield Michigan 48075. MLD is a switchless reseller registered to provide services in thirty-nine states. MLD is wholly and directly owned and controlled by the Estate of Martin Tibbitts. MLD is authorized to provide domestic, interstate service by virtue of blanket domestic 214 authority and holds international 214 authority pursuant to authority granted by the Commission in File No. ITC-214-20061107-00502.

4. National Access Long Distance, Inc. (“NALD”)

NALD is a corporation formed under the laws of the State of Nevada. NALD’s corporate headquarters are located at 2000 Town Center, Suite 1900, Southfield Michigan 48075. NALD is wholly and directly owned and controlled by the Estate of Martin Tibbitts. NALD is a switchless reseller registered to provide services in thirty-nine states and is authorized to provide domestic, interstate service by virtue of blanket domestic 214 authority. NALD does not hold international 214 authority.

5. Nationwide Long Distance Service, Inc. (“NLDS”)

NLDS is a corporation formed under the laws of the State of Nevada. NLDS’s corporate headquarters are located at 2000 Town Center, Suite 1900, Southfield Michigan 48075. NLDS is wholly and directly owned and controlled by the Estate of Martin Tibbitts. NLDS is a switchless reseller registered to provide services in forty states and is authorized to provide domestic, interstate service by virtue of blanket domestic 214 authority. NLDS does not hold international 214 authority.

B. PNG

PNG is an Ohio corporation headquartered at 8805 Governors Hill Drive, Suite 250, Cincinnati, Ohio 45349. PNG is engaged in the business of providing telecommunications services including long distance services throughout the country. PNG is a full-service provider of integrated voice, data, wi-fi, and managed services provider to commercial customers. PNG holds authority to provide interexchange services throughout the United States and holds authority to provide competitive local exchange services in thirty-six states pursuant to a Certificate of Public Convenience and Necessity or equivalent authorization. PNG is authorized to provide domestic, interstate service by virtue of blanket domestic 214 authority and holds international 214 authority pursuant to authority granted by the Commission in File No. ITC-214-1996101100515.

III. DESCRIPTION OF THE TRANSACTION

Applicants have agreed to complete a Transaction whereby PNG will acquire solely the Operating Companies' customer bases without acquiring any other operating telecommunications assets or authorizations. As a result, any authorizations, registrations, or certifications held by the Operating Companies will remain with the Operating Companies and PNG will continue to operate solely under its own authorizations.

The Operating Companies are currently reselling the domestic and international long-distance services of PNG so, upon completion of the Transaction, those customers will receive the services directly from PNG instead of through a third-party reseller. Applicants have entered into an Account Purchase Agreement whereby PNG will purchase the domestic and international long distance customer bases of the Operating Companies. Applicants therefore seek approval by and through this application, to the extent required, for the assignment of those service arrangements from the Operating Companies to PNG.

PNG is well qualified to provide service to the customers being transferred as a result of this Transaction. In fact, PNG is already the underlying provider of those services that Operating Companies are providing on a resold basis. PNG has a highly qualified management team and has access to the technical and financial resources necessary to provide service those customers.

Although the customers in question will technically experience a change in carriers immediately following the Transaction, the customers will continue to receive the same services that they currently receive, under the same rates, terms and conditions of service. Customers will receive notice of the Transaction³ and no customers are expected to be discontinued as a result of the Transaction. As a result, the proposed Transaction will be transparent to affected customers in terms of the services those customers receive.

IV. INFORMATION REQUIRED BY SECTIONS 63.24(e) & 63.18

Pursuant to Section 63.23(e)(2) of the Commission's Rules, Applicants submit the following information requested in Section 63.18(a)-(d) and (h)-(p) in support of the Application:

A. Response to Section 63.18(a)-(d)

(a) Name, address and telephone number of each Applicant:

Operating Companies:

Business Network Long Distance, Inc (FRN #0008078388)
2000 Town Center, Suite 1900
Southfield, Michigan 48075
Telephone: (586) 443-2022

Integrated Services, Inc. (FRN #0015091077)
2000 Town Center, Suite 1900

³ Customer notice obligations and Applicants' compliance with Commission Rule 64.1200(e)(3), 47 C.F.R. §§ 64.1200(e)(3) will be addressed through a separate filing.

Southfield, Michigan 48075
Telephone: (586) 443-2022

Multiline Long Distance, Inc (FRN # 0016349029)
2000 Town Center, Suite 1900
Southfield, Michigan 48075
Telephone: (586) 443-2022

National Access Long Distance, Inc. (FRN # 0008817421)
2000 Town Center, Suite 1900
Southfield, Michigan 48075
Telephone: (586) 443-2022

Nationwide Long Distance Service, Inc. (FRN # 0014872105)
2000 Town Center, Suite 1900
Southfield, Michigan 48075
Telephone: (586) 443-2022

PNG:

PNG Telecommunications, Inc. (FRN # 0018583435)
8805 Governors Hill Drive, Suite 250,
Cincinnati, Ohio 45349
Telephone: (800) 860-9495

(b) Place of organization

Operating Companies:

Business Network Long Distance, Inc is a corporation formed under the laws of the State of Nevada.

Integrated Services, Inc. is a corporation formed under the laws of the State of Nevada.

Multiline Long Distance, Inc. is a corporation formed under the laws of the State of Ohio.

National Access Long Distance, Inc. is a corporation formed under the laws of the State of Nevada.

Nationwide Long Distance Service, Inc is a corporation formed under the laws of the State of Nevada.

PNG:

PNG is a corporation formed under the laws of the State of Ohio.

(c) Name, title, address and telephone number of official and any other contact point (Answer to Question 10)

Questions and inquiries regarding this Application may be addressed to:

Brian McDermott
Strategies Law Group, PLLC
1002 Parker Street
Falls Church, Virginia 22046
Telephone: (571) 730-4970
Mobile: (301) 580-7769
bmcdermott@stratlg.com

(d) Statement as to whether Applicants have previously received authority under Section 214

Operating Companies:

All Operating Companies are authorized to provide domestic, interstate service by virtue of blanket domestic 214 authority. BNLD holds international 214 authority pursuant to authority granted in File No. ITC-214-20021216-00586. ISI holds international 214 authority pursuant to authority granted in File No. ITC-214-20060530-00292. MLD holds international 214 authority pursuant to authority granted in File No. ITC-214-20061107-00502. Neither NALD nor NLDS hold international 214 authority.

PNG:

PNG is authorized to provide domestic, interstate service by virtue of blanket domestic 214 authority and holds international 214 authority pursuant to authority granted in File No. ITC-214-1996101100515.

B. Response to Section 63.18(h)-(p)

(h) Post-Transaction Ownership (Answers to Questions 11 & 12)/Interlocking Directorates

Post-Transaction all of the transferred customers will be served by PNG. The following individuals will own or control ten percent (10%) or more of PNG:

Name:	Roberta Stevens 8805 Governors Hill Drive Suite 250 Cincinnati, Ohio 45349
Citizenship:	United States
Equity/Voting Interest:	52%
Principal Business:	Investments

Name:	Allison Stevens 8805 Governors Hill Drive Suite 250 Cincinnati, Ohio 45349
Citizenship:	United States
Equity/Voting Interest:	18%
Principal Business:	Investments

Name:	Barbara Williams 8805 Governors Hill Drive Suite 250 Cincinnati, Ohio 45349
Citizenship:	United States
Equity/Voting Interest:	18%
Principal Business:	Investments

Name:	Bernie Stevens 8805 Governors Hill Drive Suite 250 Cincinnati, Ohio 45349
Citizenship:	United States
Equity/Voting Interest:	11%
Principal Business:	Investments

None of the individuals holding ownership of PNG hold a ten percent or greater ownership interest in any other telecommunications carrier. To Applicants' knowledge, no person serving on the board or as an officer of PNG serves as an officer or director of a foreign carrier or a domestic carrier affiliate of a foreign carrier.

(i) Foreign Carrier Affiliates (Answer to Question 14)

Applicants certify that they are not foreign carriers within the meaning of Section 63.09(d) of the Commission's Rules, 47 C.F.R. § 63.09(d).

(j) Operation to Foreign Destinations (Answer to Question 15)

PNG certifies that it does not seek to provide international telecommunications services to any destination country where: (i) PNG or any of the Operation Companies is a foreign carrier; (ii) PNG or any of the Operation Companies controls a foreign carrier; (iii) any entity that owns more than 25 percent of PNG or any of the Operation Companies, or that controls PNG or any of the Operation Companies, controls a foreign carrier; or (iv) two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of PNG or any of the Operation Companies and are parties to, or the beneficiaries of, a contractual relation affecting the provision or marketing of international basic telecommunications services in the United States.

(k)- (m) Not Applicable

(n) No Special Concessions

Applicants certify that they have not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route.

(o) Anti-Drug Abuse Act Certification

Applicants certify that, pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules, it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

(p) Eligibility for Streamlined Processing

Applicants request streamlined processing of this Application pursuant to Section 63.12 of the Commission's Rules, 47 C.F.R. § 63.12. This Application qualifies for streamlined treatment under Section 63.12(c) of the Commission's Rules because (i) Applicants are not affiliated with a foreign carrier and will not become affiliated with any foreign carrier as a result of the proposed Transaction; (ii) Applicants are not affiliated with any dominant U.S. carrier whose international switched or private line services that Applicants seek authority to resell, nor will Applicants be so affiliated post-close; and (iii) none of the other scenarios outlined in Section 63.12(c) of the Commission's Rules, 47 C.F.R. § 63.12, apply.

V. INFORMATION REQUIRED BY SECTIONS 63.04

Pursuant to Section 63.04 of the Commission's Rules, the Applicants submit the following information in support of this Application:

(a)(1) Name, address and telephone number of each Applicant:

See Response to Section IV(A) above.

(a)(2) Jurisdiction of Organizations:

See Response to Section IV(A) above.

(a)(3) Correspondence concerning this Application should be sent to:

Brian McDermott
Strategies Law Group, PLLC
1002 Parker Street
Falls Church, Virginia 22046
Telephone: (571) 730-4970
Mobile: (301) 580-7769
bmcdermott@stratlg.com

(a)(4) Ownership Information

See Response to Section IV(B) above.

(a)(5) Applicants certify that they are not subject to denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1998. *See* 21 U.S.C. § 853a. *See also* 47 C.F.R. §§ 1.2001-1.2003.

(a)(6) A description of the proposed Transaction is set forth in Section III above.

(a)(7) PNG provides interexchange services in all fifty states and holds authority to provide competitive exchange service in thirty-six states. None of the Applicants or their affiliates is dominant with respect to any domestic U.S. service.

(a)(8) Applicants respectfully submit that this Application is eligible for streamlined processing pursuant to Section 63.03 of the Commission's Rules, 47 C.F.R. §63.03. In particular, with respect to domestic authority, this Application is eligible for streamlined processing pursuant to Section 63.03(b)(2)(i) because, immediately following the Transaction, (1) Applicants and their affiliates combined will hold less than a ten percent (10%) share of the interstate, interexchange market; (2) Applicants and their affiliates will provide local exchange service only in areas served by dominant local exchange carriers (none

of which are parties to the proposed Transaction) and; (3) none of the Applicants or their affiliates are dominant with respect to any service.

(a)(9) Through this Application, Applicants seek authority with respect to both international and domestic Section 214 authorizations (this Application is being separately and concurrently filed with respect to both types of authorities in compliance with Commission Rule 63.04(b), 47 C.F.R. § 63.04(b)). No other applications are being filed with the Commission with respect to the proposed Transaction.

(a)(10) Prompt completion of the proposed Transaction is critical to ensuring that Applicants can obtain the benefits described in the foregoing application. Accordingly, Applicants respectfully request that the Commission approve this Application expeditiously in order to allow Applicants to consummate the proposed Transaction as soon as possible.

(a)(11) Not applicable.

(a)(12) A statement showing how grant of the application will serve the public interest, convenience and necessity is provided in Section IV above.

VI. PUBLIC INTEREST STATEMENT

Applicants respectfully submit that the proposed Transaction serves the public interest. The proposed Transaction will allow the customers to continue to receive that same services at the same rates and terms and conditions as they currently receive. Furthermore, the proposed Transaction will not adversely affect any of the customers of the Operating Companies, all of whom will, immediately following the consummation of the Transaction, continue to receive service on an uninterrupted basis which is in the public interest. PNG will work closely with the customers being transferred to ensure a seamless Transition from the Operating Companies to PNG. The proposed changes therefore will not inconvenience, confuse or otherwise harm the customers being transferred.

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VII. CONCLUSION

For the reasons stated above, Applicants respectfully submit that the public interest, convenience, and necessity would be furthered by a grant of this Application. Applicants therefore respectfully request expedited treatment to permit Applicants to consummate the proposed Transaction as soon as possible.

Respectfully submitted,



Brian McDermott
Strategies Law Group, PLLC
1002 Parker Street
Falls Church, Virginia 22046
Telephone: (571) 730-4970
bmcdermott@stratlg.com

Dated: January 10, 2023

Verification

I, Alisha Bennett, Secretary of Business Network Long Distance, Inc., certify that with respect to Business Network Long Distance, Inc., the information in the foregoing Application is true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of January, 2023.


Alisha Bennett

Verification

I, Alisha Bennett, Secretary of Integrated Services, Inc., certify that with respect to Integrated Services, Inc., the information in the foregoing Application is true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of January, 2023.


Alisha Bennett

Verification

I, Alisha Bennett, Secretary of Multiline Long Distance, Inc., certify that with respect to Multiline Long Distance, Inc., the information in the foregoing Application is true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of January, 2023.


Alisha Bennett

Verification

I, Alisha Bennett, Secretary of National Access Long Distance, Inc., certify that with respect to National Access Long Distance, Inc., the information in the foregoing Application is true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of January, 2023.


Alisha Bennett

Verification

I, Alisha Bennett, Secretary of Nationwide Long Distance Service, Inc., certify that with respect to Nationwide Long Distance Service, Inc., the information in the foregoing Application is true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of January, 2023.

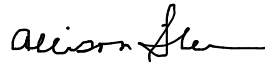

Alisha Bennett

Verification

I, Alli Stevens, Chief Executive Officer of PNG Telecommunications, Inc., certify that with respect to PNG Telecommunications, Inc., the information in the foregoing Application is true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of January, 2023.

A handwritten signature in black ink, appearing to read "Alli Stevens", is written over a horizontal line.

Alli Stevens