Attachment 1 -- Responses to Questions 25 through 34

25. The Applicant has uploaded an attachment describing the transaction and explaining how it meets the Commission's rules and that this transaction is in the public interest.

HTC Comm., Inc. ("HCI") (the "Applicant")[1] and HTC Communications, L.L.C. ("HTL") respectfully submit that the information contained herein and in the associated application form meets the Commission's rules, and that a grant of this late-filed pro forma assignment notification serves the public interest by avoiding any disruption to end users associated with correcting an inadvertent oversight when HCI merged with HTL, a merger that resulted in no change of ownership and with HTL being the surviving entity.

26. The Applicant has uploaded an attachment to provide detailed ownership listing and ownership diagrams responding to section 63.18(h) of the Commission's rules.

The following information is provided with respect to shareholders of 10% or greater of the equity interests of HCI (a corporation previously organized under the laws of the State of Nebraska) prior to its merger with HCL a limited liability company organized under the laws of the State of Nebraska. As explained herein, the reorganization that was effectuated in 2001 via the merger of HCI and HCL (with HCL being the surviving entity) was accomplished with no change in ownership of the original international Section 214 holder, HCI.[2]

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[1] As explained herein, HCI is no longer in existence. However, in order to allow the FCC's application form to be correctly filled out, HCI filed for a new FRN (as its prior one was changed in 2001 to reflect the merger with HCL. The references to HCI have been provided with the associated information all true and correct to the Applicant's and HTC's belief.

[2] The current beneficiaries and trustees of the WH Daubendiek Trust (the "Trust") are identified in the tables herein. The then-current beneficiaries of the Trust did not change in 2001 from the original grant date of HCI's international Section 214 authorization beneficiary changes have arisen since 2001 as identified below. HCI notes, however, that at all times the Trust and the trustees remained in control of WITC. More specifically, while there would have only been three beneficiaries of the Trust indirectly holding an interest greater than 10% in Hooper in 2001, the 22.9% derivative interest in Hooper previously held by Gene Daubendiek was allocated to James L. Daubendiek and Sarah Daubendiek Blackmon (brother and sister) in 2013 when their father Gene Daubendiek died on January 20, 2013. Neither James L. Daubendiek nor Sarah Daubendiek Blackmon would have personally held more than a 10% derivative interest in Hooper in 2001. Likewise, the interest presently held by Umi Daubendiek (only surviving child) of a 22.79% derivative interest in Hooper was then held by her father Joe Daubendeck who died on June 30, 2016. HCI notes that William H. Daubendiek II held the same interest in 2001 as he does now.

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Response to Question 26 (cont'd)

HCI was a wholly owned subsidiary of Hooper Telephone Company dba WesTel Systems ("Hooper"), a corporation organized under the laws of the State of Nebraska. Hooper, in turn, had and currently has one shareholder with a derivative interest of ten percent (10%) or more in HTI -- West Iowa Telephone Company ("WITC"). WITC holds approximately a ninety-four percent (94%) ownership interest in Hooper.

The only shareholder of WITC with a derivative interest of ten percent (10%) or greater in Hooper is the W.H. Daubendiek Trust Under His Last Will and Testament (the "WH Daubendiek Trust"). The WH Daubendiek Trust is an Iowa trust which holds approximately eighty-eight and nine-tenths percent (88.9%) of the outstanding shares of the sole class of capital stock in WITC. This equates to an indirect derivative ownership interest in Hooper of approximately eighty-three and six-tenths percent (83.6%). All current trustees and beneficiaries of the WH Daubendiek Trust are U.S. citizens. The situs of the WH Daubendiek Trust and the identities of the four current trustees of the WH Daubendiek Trust are set forth below.

Name	**Title**	**Occupation**	**Citizenship**
W.H. Daubendiek Trust Under His Last Will and Testament	N/A	Trust – holding company	United States
James L. Daubendiek	Trustee	Retired	United States
Stephany Harvey	Trustee	Retired	United States
Jenny Robinson	Trustee	Chief Financial Officer – Tourism and Entertainment Industry	United States
William H. Daubendiek II	Trustee	Retired	United States

The current beneficiaries of the WH Daubendiek Trust who indirectly held a derivative interest in HCI (and currently HCL) of ten percent (10.0%) or greater in Hooper by virtue of their

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Response to Question 26 (cont'd)

beneficiary interest in the WH Daubendiek Trust and their personal holdings are identified below.

Name	Address	Occupation	Citizenship	Derivative Ownership Interest
James L. Daubendiek	1518 Hawthorne Lane Jefferson, IA 50129	Retired	United States	11.45%
Sarah Daubendiek Blackmon	216 Golf Drive Holy Lake Ranch, TX 75765	Retired	United States	11.83%
Umi Daubendeck	5103 Beverly Skyline Austin, TX 78731	Student	United States	22.79%
William H. Daubendiek II	45837 150th Street P.O. Box 596 Remsen, IA 51050	Retired	United States	23.12%

No other shareholders of WITC or beneficiaries of the WH Daubendiek Trust hold a sufficient direct or indirect interest in WITC to equate to a derivative interest in Hooper, HCI, or HCL of ten percent (10.0%) or greater. The pre- and post- corporate charts are provided below:

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Response to Question 26 (cont'd)

Pre-Pro Forma Transaction Associated with Long Distance Operations

Hooper Telephone Company dba WesTel Systems

West Iowa Telephone Company
dba WesTel Systems - 94%
ownership ←-------

W.H. Daubendiek Trust Under
His Last Will and Testament
83.6 derivative ownership
in Hooper. Beneficiaries of Trust
with derivative interest in Hooper:
James L. Daubendiek – 11.45%
Sarah Daubendiek Blackmon – 11.83%
Umi Daubendeck – 22.79%
William H. Daubendiek – 23.12%

HTC Communications, Inc.

Post-Pro Forma Transaction Associated with Long Distance Operations

Hooper Telephone Company dba WesTel

West Iowa Telephone Company
dba WesTel Systems - 94%
ownership ←-------

W.H. Daubendiek Trust Under
His Last Will and Testament
83.6 derivative ownership
in Hooper. Beneficiaries of Trust
with derivative interest in Hooper:
James L. Daubendiek – 11.45%
Sarah Daubendiek Blackmon – 11.83%
Umi Daubendeck – 22.79%
William H. Daubendiek – 23.12%

HTC Communications, Inc.

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27. The applicant has uploaded to attachment identifying any interlocking directorates with a foreign carrier, pursuant to section 63.18(h) of the Commission's rules.

There are no interlocking directorates with a foreign carrier.

28. The Assignee has uploaded information to demonstrate that it qualifies for non-dominant classification under section 63.10 of the Commission's rules.

Pursuant to 47 C.F.R. § 63.10(a)(1), HCL qualifies as a non-dominant carrier in that it "has no affiliation with, and that itself is not, a foreign carrier in a particular country to which it provides service (i.e., a destination country)."

29. The Applicant has uploaded an explanation for its certification that the assignment or transfer of control was pro forma, as defined in section 63.24 of the Commission's rules, and together with all previous pro forma transactions, does not result in a change of the authorization holder's ultimate control.

HCI and HCL respectfully submit that the change in corporate status – from a corporation to a limited liability company – which resulted in no change of control or ownership of HCI falls with the presumptive pro forma classifications found in 47 C.F.R. § 63.24(d) note 2 of the Commission's rules. *See* 47 C.F.R. § 63.24(d) note 2 (". . . Transfers of control or assignments that do not result in a change in the actual controlling party are considered non-substantial or pro forma . . ." as the transaction described herein was an "assignment from a corporation to a corporation owned or controlled by the assignor stockholders without substantial change in their interests. . . .")

30. The Applicant has uploaded an explanation as to why the pro forma notification was not provided to the Commission no later than thirty days (30) or less after the consummation in accordance with section 63.24(f) of the Commission's rules.

The transaction between HCI and HCL involved the pro forma assignment of HCI's international Section 214 authorization to HCL The companies note that, in the due diligence leading up to the proposed transaction simultaneously filed herewith where HCL's parent company – Hooper -- is being sold to Northeast Nebraska Telephone Company, it was discovered that the international Section 214 authorization possessed by HCI should have been assigned to HCL at the time that HCL began service in calendar year 2001. HCI and HCL regret this oversight and inadvertent error in not making the necessary notification at the time of the reorganization.

Attachment 1 -- Responses to Questions 25 through 34

31. The Applicant has uploaded a statement showing that its application qualifies for exclusion from referral to the Executive Branch under section 1.40001(a)(2) of the Commission's rules.

HCI and HCL respectfully submit that no foreign ownership is at issue and thus 47 C.F.R. § 1.40001(a)(2) is in applicable. *See* 47 C.F.R. §1.40001(a)(1).

32. The Applicant has uploaded an attachment that includes a statement of how the application qualifies for streamlined processing under section 63.12 of the Commission's rules.

This Application qualifies for international streamlined processing under Sections 63.12(a) and (b) of the Commission's Rules. No party is affiliated with any foreign carrier in any destination market. No party has an affiliation with a dominant US carrier whose international switched or private line services the applicants seek authority to resell. No party to this application seeks authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines. Authorization is sought to rectify an inadvertent oversight with respect to the failure to submit the necessary application to inform the Commission that the legal status of the Applicant – HCI – was merged into HCL, thus changing the legal status of the Licensee (*i.e.*, HCI) from a "corporation" to a "limited liability company" and without any change in ownership. Thus, HTL has operated and continues to operate as a non-dominant carrier reselling the international switched services of one or more unaffiliated US carriers.

33. The Applicant has uploaded an attachment providing the information and certifications required by section 63.18(i) through (m) of the Commission's rules.

Please see attached form and the applicable discussion herein.

34. The Applicant has uploaded a statement supporting the waiver request and identifying the rule number(s) involved, along with other material information.

No waiver requests are being requested. The instant application seeks to correct an inadvertent oversight and error in not submitting the necessary paperwork with the Commission with respect to the pro forma assignment of the international Section 214 resale authorization from HCI to HCL.