

ANSWER TO QUESTION 10

Information for the Assignor, Section 214 Holder, and Assignee:

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- Assignor, Frontera Telecommunications, Inc. (“Frontera”; FRN 0004056016), is a Texas corporation owned 50 percent by Curtis H. Hunt (FRN 0012466488) and 50 percent by Herman C. Roark, Jr. (FRN 0012466587), both United States citizens.
- Border to Border Communications, Inc. (“Border”; FRN 000167735) is a Texas corporation owned 50 percent by Curtis H. Hunt (FRN 0012466488) and 50 percent by Herman C. Roark, Jr. (FRN 0012466587), both United States citizens.
- Border has not previously received International authority under Section 214 of the Act. Border is a rural incumbent local exchange carrier (“ILEC”) that provides local exchange telephone services and interstate exchange access services in the State of Texas pursuant to a blanket domestic Section 214 authorization. Border also holds a certificate of convenience and necessity (“CCN”) from the Public Utility Commission of Texas to provide local exchange telephone services (including interstate exchange access) in the Falcon Exchange in Zapata County, Texas.

ANSWER TO QUESTION 11

The name, address, citizenship, and principal business of both Frontera's and Border's ten percent or greater direct and indirect shareholders or other equity holders is set forth below:

Herman C. Roark, Jr.
FRN 0012466587
P. O. Box 171
Comfort, Texas 78013
Principal Business: President and Director of Telecommunications Corporation
Percent Equity Ownership: 50%
Citizenship: U.S.A

Curtis H. Hunt
FRN 0012466488
188 Northwest Hills Drive
Kerrville, TX 78028
Principal Business: Secretary and Director of Telecommunications Corporation
Percent Equity Ownership: 50%
Citizenship: U.S.A

Neither Frontera nor Border has any interlocking directorates with a foreign carrier.

ANSWER TO QUESTION 13

Pursuant to Federal Communications Commission ("FCC" of "Commission") Rule Section 63.24(d), Frontera Telecommunications, Inc. ("Frontera"; FRN 0004056016), holder of International 214 Authorization File No. ITC-214-20010126-00053, hereby notifies the FCC of a pro forma assignment by merger under Texas State law whereby Frontera was merged into its affiliate, Border to Border Communications, Inc. ("Border" or "Surviving Company"; FRN 000167735). Both Frontera and Border are wholly owned by Curtis H. Hunt (FRN 0012466488) and Herman C. Roark, Jr. (FRN 0012466587) (collectively, the "Assignors" and "Assignees"), both United States citizens who each hold a 50 percent interest in the entities. As Frontera no longer exists as a legal entity, the parties hereby request that the Commission change the name of the International 214 Authorization holder to Border.

Frontera, and three affiliated companies, including Border, each owned 50 percent by Curtis H. Hunt and 50 percent by Herman C. Roark, Jr., have merged into the Surviving Company, Border, pursuant to Chapter 10 of the Texas Business Organizations Code. Border continues to be governed by the laws of the State of Texas. Under Texas law, the separate corporate existence of Frontera ceased to exist upon the filing of an Agreement and Plan of Merger with the Secretary of the State of Texas. The merger did not involve the liquidation of one company and the recapitalization of another, but rather allowed Frontera to merge into the Surviving Company, Border, as a matter of state law.

Pursuant to Chapter 10 of the Texas Business Organizations Code, a Texas business entity may merge into a Surviving Company with shareholder approval by merely filing an Agreement and Plan of Merger with the Texas Secretary of State. On the date of such submission, without any action on the part of the interest holders, each share of Common Stock of the merged company issued and outstanding immediately prior to the merger ceases to exist. The Surviving Company succeeds to all of the rights, privileges, debts, liabilities, powers and property of the companies merged. All property, rights, privileges, and other assets of every kind of the merged entity are transferred to and vested in the Surviving Company. In addition, all rights of creditors and all liens upon any property remain preserved unimpaired, and all debts, liabilities and duties attach to the Surviving Company and may be enforced against it to the same extent as if they had been incurred or contracted by it. The merger is automatic, and the Surviving Company is deemed to be the same entity as the merged business entity. Thus, under Texas State law, no assignment or transfer of control is deemed to have occurred by the subject merger.

In this case, all assets held by the Frontera continue to be held by the Surviving Company, Border, without out any reversion or impairment and without any transfer or assignment having occurred. Likewise, with respect to liabilities, all debts, liabilities and duties of Frontera remain attached to the Surviving Company, Border. In addition, the subject corporate reorganization by merger involves no change in the beneficial ownership of the Surviving Company, Border.

Pursuant to Section 1.3 of the Commission's rules, Border hereby requests a waiver of Section 63.24(f)(2) of the Commission's rules which requires a pro forma assignee that is subject to a pro forma assignment to file a notification with the Commission no later than thirty (30) days after the assignment is completed. Despite the fact that no assignment or transfer of control is deemed to have occurred as a result of the merger under Texas State law, and because the merger occurred more than thirty days ago, Border requests a waiver of the thirty day notice to the extent the thirty day notice requirement were deemed to be applicable.

Pursuant to FCC Rule Section 1.3, the Commission may grant a waiver for good cause. Border submits that because the failure to timely file this notification was inadvertent and was discovered during a due diligence review of its licenses in anticipation of a transfer of control of Border, it would not be in the public interest to deny the requested waiver. The reorganization described herein did not involve any substantial change in ownership and was undertaken to simplify and streamline the ownership interests of the Assignors/Assignees by consolidating affiliated companies with the same ownership structure. In addition, the Assignors/Assignees certify that the assignment is pro forma, and does not result in a change in the actual controlling parties. The failure to notify the FCC within thirty days of the merger at the time was inadvertent and the public interest would not be served by denial of the present application. In light of the absence of any harm to the public resulting from this restructuring, a grant of the requested waiver would be in the public interest.

The parties hereby certify that the subject assignment is pro forma and that, together with all previous pro forma transactions, does not result in a change in the actual controlling party.

The parties hereby certify, pursuant to 47 C.F.R. §§1.2001 through 1.2003, that no party to the present application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.