

Attachment 1
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Answer to Question 10

In Attachment 1, please respond to paragraphs (c) and (d) of Section 63.18 with respect to the assignor/transferor and the assignee/transferee.

63.18(c)

Assignor: PrimeLink, Inc.
c/o
Mark T. Webster
Secretary and Controller
11118 Route 9, PO Box 782
Champlain, NY 12919
Telephone: (518) 298-2480
Facsimile: (518) 298-8882

Assignee: CTC LD, Inc.
Mark T. Webster
Secretary and Controller
11118 Route 9, PO Box 782
Champlain, NY 12919
Telephone: (518) 298-2480
Facsimile: (518) 298-8882

Copies of all correspondence, notices, and inquiries should also be addressed to:

Thomas J. Moorman
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5335 Wisconsin Avenue, NW, Suite 950
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63.18(d)

CTC LD, Inc. holds an International Telecommunications Certification for global and/or limited global resale service, File No. ITC-214-20200403-00046.

Answer to Question 11

Does any entity, directly or indirectly, own at least ten (10) percent of the equity of the assignee/transferee as determined by successive multiplication in the manner specified in the note to Section 63.18(h) of the rules?

If you answered "Yes" to this question, provide in Attachment 1, the name, address, citizenship, and principal businesses of each person or entity that directly or indirectly owns at least ten (10) percent of the equity of the assignee/transferee, and the percentage of equity owned by each of those persons or entities (to the nearest one percent).

CTC LD, Inc. is a New York corporation and is subject to the laws of the United States.

CTC LD, Inc. is a direct, wholly owned subsidiary of K&S Communications, Inc. ("K&S"), a holding company that is a corporation organized under the laws of the State of New York.

K&S is a direct, wholly owned subsidiary of Champlain Telephone Company ("CTC"), an incumbent local exchange carrier that is organized under the laws of the State of New York.

CTC is directly, majority owned (50.07%) by Tandem, LLC ("Tandem"), a holding company that is a limited liability company organized under the laws of the State of New York. No other person or entity has a 10% or greater direct interest in CTC.

The sole member of Tandem is Trent Trahan. Mr. Trahan is a citizen of the United States. Mr. Trahan's principal occupation is a telecommunications executive.

Other than as set forth in this response, currently no other person or entity, directly or indirectly, owns or controls a 10% or greater interest in CTC LD, Inc.

CTC LD, Inc., K&S, CTC, Tandem and Mr. Trahan's address are 11118 Route 9, PO Box 782, Champlain, NY 12919.

There are no interlocking directorates with a foreign carrier.

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Answer to Question 13

Provide in Attachment 1 a narrative of the means by which the proposed assignment or transfer of control will take place. In circumstances of a substantial assignment or transfer of control pursuant to Section 63.24(e), where the assignor seeks authority to assign only a portion of its U.S. international assets and/or customer base, please specify whether the assignor requests authority to continue to operate under any or all of its international Section 214 File Nos. after consummation; and, if so, please specify in Attachment 1 each File No. it seeks to retain in its own name. Label your response "Answer to Question 13."

CTC LD, Inc. currently is affiliated with PrimeLink, Inc. ("PLI").¹ PLI holds international Section 214 authorizations to provide facilities-based and global resold international services pursuant to IB File Nos. ITC-214-19970324-00166 and ITC-214-19990924-00588.

PLI currently is wholly-owned by K&S Communications, Inc.

The ownership structure of PLI and CTC LD, Inc. are currently the same.

As of August 15, 2020, CTC LD, Inc. has had assigned to it a portion of PLI's customer base. Such partial assignment of PLI's customer base to CTC LD, Inc. was made prior to the consummation of a separate but pending transaction involving PLI.² Specifically, CTC LD, Inc. has become the domestic and international long distance service provider for those residential customers who were previously served by PLI and that reside within service territory of The Champlain Telephone Company, the ultimate parent company of both CTC LD, Inc. and PLI. As part of this pro forma transaction, CTC LD, Inc. previously submitted and complied with the necessary assignment of the customer base of PLI described herein, as required by Section 64.1120(e) of the Commission's Rules in CC Docket 00-257.

The assignment of these customers from PLI to CTC LD, Inc. did not involve any modification or assignment of the international Section 214 authorizations currently held by PLI as noted above. Rather, PLI retains its international Section 214 authorizations and continues to provide service to its remaining customers pursuant to those authorizations.

Because CTC LD, Inc. and PLI currently are commonly owned, the assignment of the affected customers to CTC LD, Inc. is "pro forma" under 47 C.F.R. § 63.24(d) in that the assignment did *not* "result in a change in the actual controlling party" for the entities involved. Moreover, the instant assignment reflects a "[c]orporate reorganization that involves no substantial change in the beneficial ownership of the corporation." 47 C.F.R. § 63.24(d) (Note

¹ As described in ITC-T/C-20200310-00040, control of PLI is expected to be transferred to FirstLight Fiber, Inc.

² See *supra* note 1.

