

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Kynect Communications LTD)	
Assignor,)	
)	
and)	
)	IB File No. ITC-ASG-2021
LKN Communications, Inc.)	
Assignee,)	
)	
Joint Application For Authority To Assign Assets of)	
Kynect Communications LTD Pursuant to Section)	
214 of the Communications Act of 1934 , As)	
Amended)	

JOINT APPLICATION

Pursuant to Section 214 of the Communications Act of 1934, as amended (the “Act”),¹ and Section 63.24 of the Commission’s rules,² Kynect Communications LTD (“Kynect” or “Assignor”) and LKN Communications, Inc. (“LKN” or “Assignee”) (together, the “Applicants”) hereby respectfully request Commission consent for the assignment of assets, specifically customers, from Kynect to LKN.

I. REQUEST FOR STREAMLINED TREATMENT

This Application qualifies for streamlined treatment under Section 63.12 of the Commission’s rules. The Assignee is affiliated with several foreign carriers (listed in response to Question 12 below). However, the affiliated foreign carriers own no facilities in the destination markets. Accordingly, the Assignee satisfies the exception set forth in §63.12(c)(1)(iii) to the exclusion from streamlined processing under §63.12(c)(1) and that exclusion therefore does not apply. Further, the Assignee is not affiliated with any dominant U.S. carriers; accordingly, the exclusion from streamlined processing under §63.12(c)(2) does not apply.

¹ 47 U.S.C. § 214.

² 47 C.F.R. §63.24.

II. DESCRIPTION OF THE APPLICANTS

A. The Assignor

Kynect Communications LTD³ (FRN: 0023852288) is a limited liability corporation organized under the laws of the state of Texas in 2014, with headquarters located at 14675 Dallas Parkway, Suite 120, Dallas, TX 75254. It is authorized pursuant to ITC-214-20140806-00233 to provide International Global or Limited Global Resale Service (DA-14-1351). Kynect provides resold Commercial Mobile Radio Services (“CMRS” or “wireless services”) throughout the United States.

B. The Assignee

LKN Communications, Inc. (FRN: 0009273566) is a Michigan corporation, incorporated on November 24, 1994, with its headquarters located at 1000 Progress Place, Concord, NC 28025. Its wholly-owned subsidiary, Flash Wireless, LLC (FRN: 0020927323), is a limited liability company organized under the laws of the state of Delaware in 2011 that is authorized to provide International Global or Limited Global Resale Service under the Section 214 authorization held by LKN (ITC-214-20000203-00052.) Flash Wireless provides resold Commercial Mobile Radio Services to customers throughout the United States.

III. DESCRIPTION OF THE TRANSACTION

Pursuant to a Purchase Agreement (“Agreement”) between the Joint Applicants, Kynect proposes to transfer its customer base to Flash Wireless, which will become the service provider for the resold wireless services that the customers currently receive from Kynect. The approximate number of customers to be transferred is 1,871. Upon closing of the transaction, Kynect will discontinue its resold CMRS offerings and seeks to relinquish its international 214 license, ITC-214-20140806-00233.

The proposed transfer of customer base will have no adverse impact on Kynect’s customers who will continue to receive the same wireless services, under the same rates, terms and conditions

³ Kynect Communications LTD was formerly known as Stream Communications LLC; a notice of name change has been submitted via IBFS.

of service following the transfer to Flash Wireless. The Joint Applicants propose to close the transaction upon receiving the required regulatory approvals, including that of the Federal Communications Commission.

IV. PUBLIC INTEREST STATEMENT

Approval of the proposed transaction will serve the public interest. As noted above, the Transaction will have no negative impact on the customers served by Kynect, who will continue to receive the same resold wireless services at the same rates, terms and conditions. Flash Wireless will notify the customers of any future changes in rates, terms and/or conditions of service consistent with applicable regulatory requirements. Based upon its experience in successfully providing resold wireless services to retail customers in the U.S., Flash Wireless is well qualified to serve the customers presently served by Kynect.

V. INFORMATION REQUIRED BY 47 C.F.R. § 63.18 AND THE IBFS SECTION 214 MAIN FORM

The Applicants submit the following information pursuant to 47 C.F.R. § 63.18 and the IBFS Section 214 Main Form, in support of their request for consent to this assignment of Kynect's 214 authorization:

Answer to Question 10

Correspondence concerning this Joint Application should be directed to:

For *LKN Communications, Inc.*:
LKN Communications, Inc.
Attn: Dave Stevanovski, COO
1000 Progress Place
Concord, NC 28025
legalnotices@acninc.com
(704) 260-3000

For *Kynect Communications LTD*:
Kynect Communications LTD
Attn: Rodney Erakovich
14675 Dallas Parkway
Suite 120
Dallas, TX 75254
Rodney.EraKovich@wekynect.com
(214) 210-6309

With a copy to:

Sharon Thomas
Consultant
Inteserra Consulting Group, Inc.
151 Southhall Lane, Suite 450
Maitland, FL 32751
Telephone: (407) 740-3031
stthomas@inteserra.com

Place of Organization

LKN Communications, Inc. was incorporated in the state of Michigan.

Kynect Communications LTD was organized in the state of Texas.

Prior International Section 214 Authorizations

LKN Communications, Inc. holds authority to provide International Global or Limited Global Resale Service pursuant to ITC-214-20000203-00052. Its wholly-owned subsidiary, Flash Wireless, LLC, provides international resold wireless service pursuant to that authority.

Kynect Communications LTD is authorized pursuant to ITC-214-20140806-00233 to provide International Global or Limited Global Resale Service (DA-14-1351) and provides resold wireless services pursuant to that authority.

Answer to Question 11

Pursuant to Section 63.18(h) of the Commission's rules, the entities described below will directly or indirectly hold a ten percent or greater equity interest in LKN upon consummation of the proposed transaction.

LKN Communications, Inc. is wholly owned by LKN Global Holdings, Inc. The following individuals ultimately hold/control 10% or greater interest in LKN Global Holdings, Inc., and therefore indirectly hold/control 10% or greater interest in LKN:

Dave Stevanovski
Citizenship: U.S.
Principal Business: Individual
Business Address:
c/o LKN Global Holdings, Inc.
1000 Progress Place
Concord, NC 28025-2449
Attn: Legal Department
Percent ownership: Approx. 23%

Robert Stevanovski
Citizenship: U.S.
Principal Business: Individual
Business Address:
c/o LKN Global Holdings, Inc.
1000 Progress Place
Concord, NC 28025-2449
Attn: Legal Department
Percent ownership: Approx. 29%

Gregory Provenzano
Citizenship: U.S.
Principal Business: Individual
Business Address:
c/o LKN Global Holdings, Inc.
1000 Progress Place
Concord, NC 28025-2449
Attn: Legal Department
Percent ownership: Approx. 16%

Michael Cupisz
Citizenship: U.S.
Principal Business: Individual
Business Address:
c/o LKN Global Holdings, Inc.
1000 Progress Place
Concord, NC 28025-2449
Attn: Legal Department
Percent ownership: Approx. 15%

Anthony Cupisz
 Citizenship: U.S.
 Principal Business: Individual
 Business Address:
 c/o LKN Global Holdings, Inc.
 1000 Progress Place
 Concord, NC 28025-2449
 Attn: Legal Department
 Percent ownership: Approx. 17%

Answer to Question 12

LKN Communications, Inc. (“LKN”) has the following interlocking directorates with foreign carriers, which are all wholly owned by LKN.

Name	Position/Title with LKN	Foreign Carrier	Role with Foreign Carrier	Country
Robert Stevanovski	Director, Chairman	ACN Danmark A/S	Director	Denmark
		ACN Korea, Inc.	Director	S. Korea
		Logistica Flash Colombia S.A.S.	Director, President	Colombia
		Flash Servicios Peru S.R.I.	General Manager	Peru
		Logistica ACN Mexico, S. de R.L. de C.V.	Chairman of Board of Managers	Mexico
		Flash Corporation G.K.	Executor	Japan

Name	Position/Title with LKN	Foreign Carrier	Role with Foreign Carrier	Country
Charles Baker	Director, CEO, Secretary, Treasurer	All Communications Network of Canada Co.	Director, Secretary, Treasurer	Canada
		ACN European Services, Ltd.	Director, Secretary	United Kingdom
		ACN Danmark A/s	Director	Denmark
		ACN Korea, Inc.	Director	S. Korea
		Logistica Flash Colombia S.A.S.	Director, Secretary	Colombia
		Logistica ACN Mexico, S. de R.L. de C.V.	Member of Board of Managers	Mexico
Dave Stevanovski	Vice President	All Communications Network of Canada Co.	Director, President	Canada
		Flash Corporation GK	Director	Japan
		ACN Japan GK	Director	Japan
David Merriman	Executive Vice President, Global Development	ACN Marketing y Servicios de Telecomunicaciones SL	Director	Spain
		ACN Communications Sweden AB	Board of Directors (Chair)	Sweden
		ACN European Services Ltd.	Director	United Kingdom
		ACN Communications Services GmbH	Director	Austria
		ACN Danmark A/S	Director	Denmark
		ACN Communications France SAS	President	France
		ACN Communications GmbH	Director	Germany
		ACN Italia Communications Srl	Director	Italy
		ACN Europe BV	Director	Netherlands
		ACN Communications Polska sp. Zo.o.	Director	Poland
		ACN Japan GK	Director	Japan
		ACN Korea, Inc.	Representative	S. Korea
		Logistica Flash Colombia S.A.S.	Director	Colombia
		Logistica ACN Mexico, S. de R.L. de C.V.	Board of Managers-Member	Mexico

Answer to Question 13

A description of the proposed transaction and demonstration of how it will serve the public interest are set forth in Sections III and IV above.

Answer to Question 14

LKN is affiliated with foreign carriers authorized to operate in the following foreign countries:

Canada
Denmark
Austria
France
Germany
Italy
Netherlands
Poland
Spain
Sweden
South Korea
Colombia
Peru
Mexico
Japan
United Kingdom

Answer to Question 15

If this Application is granted and the proposed assignment is consummated, the Assignee, LKN, through its subsidiary Flash Wireless, would be authorized to provide service to a destination country in which LKN also controls a foreign carrier in the countries listed in response to Question 14 above. The list of foreign carriers is included in response to Question 12.

Answer to Question 16

Upon consummation of the proposed transaction, Applicant requests classification as a “non-dominant” carrier between the United States and all of the countries listed in response to Question 14 and provides the following information to satisfy the presumption of non-dominance pursuant to Section 63.10(4) of the Commission’s rules.

LKN, through its subsidiary Flash Wireless, operates strictly as a reseller of unaffiliated U.S. facilities-based carriers' international switched services to all international destinations for which it seeks authority, including those in which it is affiliated with a foreign carrier.

Answer to Question 20

Applicants respectfully submit that this application qualifies for streamlined processing pursuant to Section 63.12 of the Commission's Rules. The Assignee is affiliated with several foreign carriers (listed in response to Question 12 below). However, the affiliated foreign carriers own no facilities in the destination markets as defined in §63.12(c)(1)(iii) and, therefore, the exclusion from streamlined processing under §63.12(c)(1) does not apply. Further, the Applicant is not affiliated with any dominant U.S. carriers; accordingly, the exclusion from streamlined processing under §63.12(c)(2) does not apply.

VI. CONCLUSION

Based on the foregoing, the Applicants respectfully request that the Commission promptly grant this Joint Application.

Respectfully submitted,

By: LKN Communications, Inc.

/s/ Dave Stevanovski
Dave Stevanovski, COO
LKN Communications, Inc.
1000 Progress Place
Concord, NC 28025
Legalnotices@acninc.com
(704) 260-3000

By: Kynect Communications LTD

/s/ Rodney Erakovich
Wireless Operations Manager
Kynect Communications LTD
14675 Dallas Parkway
Suite 120
Dallas, TX 75254
Rodney.Erakovich@wekynect.com
(214) 210-6309

Dated: November 12, 2021