

## Attachment 1

### **Response to Question 10:**

Internet Solver, Inc. ("Internet Solver") and Alliance Connect, LLC ("ACL") (collectively the "Applicants"), pursuant to Section 214 of the Communications Act, as amended, 47 U.S.C. § 214, and Sections 63.04 and 63.24 of the Commission's Rules, 47 C.F.R. §§ 63.04, 63.24, respectfully request Special Temporary Authority ("STA") to allow Internet Solver to continue to operate pending Commission approval of the parties' Application for consent to the assignment of all of the assets of Internet Solver to ACL that are related to Internet Solver's business as a competitive local exchange carrier.

As discussed in the Application, Internet Solver is a holder of domestic 214 "blanket" authorization and international 214 authorization (ITC-214-20061013-00469). Internet Solver does not currently provide international services. ACL provides land-line local exchange telecommunications services as a competitive local exchange carrier in Iowa in the service territories of the following ILECs: CenturyLink (Qwest), Frontier, and Windstream. ACL is a wholly-owned subsidiary of Alliance Technologies, Inc. ("ATI"). ATI is owned by Iowa Network Services, Inc., ("INS") an Iowa corporation, and Mr. Steve Sikkink. INS is owned by many rural ILECs, none of which holds an ownership and/or voting interest of 10 percent or more in INS.

On June 1, 2013, ATI acquired substantially all of the assets of Internet Solver, including Internet Solver's licenses, authorizations, customer accounts and receivables, customer and vendor contracts and agreements equipment and intellectual property. Under the Asset Purchase Agreement, Internet Solver will continue to have sole responsibility for providing service to customers, billing and collecting payment from customers and responding to customer inquiries and complaints until approval of the transaction by the Iowa Utilities Board. Upon receipt of all regulatory approvals, ATI will transfer all of the acquired assets to its wholly-owned subsidiary, ACL.

Applicants' failure to obtain Commission approval for the transfer of control was inadvertent. Applicants were not aware of their obligation under the Communications Act and the Commission's rules to obtain approval for the proposed transaction until consulting with Regulatory Counsel. As noted, Internet Solver currently does not have any international customers. It is also important to note that under the terms of the transaction, Internet Solver continues in existence and all of Internet Solver's contracts and activities under its authorizations from the FCC and the Iowa Utilities Board continue to be provided by Internet Solver, and will continue to be provided by Internet Solver until all approvals from the Iowa Utilities Board have been obtained. Internet Solver will therefore in actual practice continue to provide all of the Commission regulated services until all of the regulatory approvals have been obtained. There has not, therefore, in actual practice been a transfer of the physical activities governed by the Commission. The Applicants have been forthcoming about the facts of this transaction, and regret any inconvenience this filing may cause the Commission or its staff. Nonetheless, Applicants understand this STA is necessary to address the Applicants' failure to obtain prior FCC approval of the assignment of Internet Solver's international Section 214 authorization.

Grant of this STA request will serve the public interest. It will allow Internet Solver to operate during the pendency of the assignment application before the FCC. Further, as described more fully in the assignment application, allowing Internet Solver to continue operations until such time as the application is approved will promote competition in the domestic and international communications services marketplace. ACL will be able to provide Internet Solver's customers with additional and advanced telecommunications services that will enhance the services they already

receive. Finally, grant of the instant request will allow Applicants to come into compliance, and begin the formal wind-down process for Internet Solver, thereby reducing the administrative burden on the Commission.

The Applicants acknowledge that grant of this STA request will not prejudice any action the Commission might take on the Joint Application, and the STA may be revoked by the Commission on its own motion and without a hearing. Applicants further acknowledge that grant of this STA request and the Joint Application will not preclude enforcement action.

**Response to Question 12:**

N/A; the Applicant is not a foreign carrier and is not affiliated with a foreign carrier as defined in 47 C.F.R. § 63.09(e).

**Response to Question 16:**

47 C.F.R. 63.18(d): Internet Solver holds international Section 214 authority to provide global or limited global resale services, as granted by the Commission in FCC ;I File No. ITC-214-20061013-00469. In addition, Internet Solver holds blanket domestic Section 214 authority.<sup>1</sup> ACL holds blanket domestic Section 214 authority, but has not previously received international authority under Section 214 of the Act.

47 C.F.R. 63.18(e)(3): N/A; Applicants are not applying for authority to acquire facilities or to provide services not covered by 47 C.F.R. § 63.18(e)(1) or 47 C.F.R. § 63.18(e)(2).

47 C.F.R. 63.18(g): N/A; Applicants are not applying for facilities-based authority under 47 C.F.R. 63.18(e).

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<sup>1</sup> See 47 C.F.R. § 63.01.