

**LigTel Communications, Inc.**

**Question 10: In Attachment 1, provide justification of need for special temporary authority requested.**

**Response:**

LigTel Communications, Inc. (“LCI”) respectfully submits that the public interest would be served by a grant of this Special Temporary Authority (“STA”) pending grant of its application for the transfer of control regarding its Section 63.18(e)(2) (global resale authority), File No. ITC-214-20000270-00064, filed simultaneously herewith.<sup>1</sup> Thus, prompt action granting this STA will allow LCI’s customers to continue to utilize the international long distance service offered by it

The instant request for STA is a companion filing to correct the inadvertent error of not seeking the January 15, 2005 transfer of control of LTC and indirectly the transfer of control of LCI. At the time of the transfer of control, LTC was the parent company of LCI and is now, along with LCI, a wholly owned subsidiary of Heartland Innovations, Inc. (“Heartland”) arising from a January 1, 2017 pro forma transfer of control.<sup>2</sup>

Grant of this request for STA will ensure that LCI will be able to continue to provide uninterrupted international resold service. LCI expressly acknowledges that grant of this request will not prejudice action by the Commission on the underlying International 214 Application and that any authority granted pursuant to this request is subject to cancellation or modification upon notice but without a hearing.

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<sup>1</sup> LCI and its affiliate, Ligonier Telephone Company, Inc. (“LTC”), will also be filing ha STA request to continue their domestic operations. A copy of this STA request will be provided to the FCC International Bureau once filed.

<sup>2</sup> At the time of the transfer of control, LTC was the parent company of LCI and is now, along with LCI, a wholly owned subsidiary of Heartland arising from a January 1, 2017 pro forma transfer of control. As a result of the Companies’ planned corporate reorganization, Heartland was formed and, on January 1, 20017, Heartland established LTC and LCI as separate wholly-owned subsidiaries. The ownership of Heartland, an Indiana corporation formed for the purpose of reorganization, is the same as that previously for LTC. Specifically, the former shareholders of LCI’s parent company, LTC, exchanged their shares of LTC for shares of Heartland. As a result of the reorganization, both LCI and LTC are wholly owned subsidiaries of Heartland, and the shareholders of Heartland, after the reorganization, are identical to the previous shareholders of LTC.

**Section 214 Application for  
Special Temporary Authority  
Attachment 1, Page 2 of 2**

Good cause exists for grant of the instant request, which would ensure that consumers would not suffer inconvenience or loss of service, or otherwise be affected adversely. Having become aware of the inadvertent oversight regarding ownership changes arising from the death of Dr. Schloss, LCI is voluntarily attempting to take all steps necessary to rectify the situation. Accordingly, LCI submits that the public interest would be serviced by prompt grant of the instant request.

Applicants request that the STA be granted for a period of sixty (60) days to permit the Commission to complete its processing of the pending domestic 214 application in due course.

**Question 16: In Attachment 1, respond to paragraphs (d), (e)(3) and (g) of Section 63.18.**

**Response:**

In response to 47 C.F.R. §63.18(d), LCI, the Applicant, has been granted international global resale authority under File No. ITC-214-20000270-00064 (*see* Public Notice, Report No. TEL-00997, DA No. 06-360, released February 16, 2006) to resell the international services of authorized U.S. common carriers for the provision of international switched, private line, data, television and business services to all international points, and to resell private lines for the purpose of providing international basic switched services to countries found to offer equivalent resale opportunities. Accordingly, Sections 63.18(e)(3) and 63.18(g) are not applicable.