

SUPPLEMENT TO APPLICATION FOR SPECIAL TEMPORARY AUTHORITY

GreatCall, Inc. (“GreatCall”) hereby requests Special Temporary Authority (“STA”) to continue to provide service to its customers pursuant to its Section 214 authorization for global resale, File No. ITC-214-20130307-00069, for a period of 60 days pending grant of an application for authority to transfer control of this authorization to GreatCall’s current ownership. It is in the public interest to avoid a discontinuance of service to customers while the Commission considers the underlying application.

Contemporaneous with this application for STA, GreatCall is filing an application for transfer of control of GreatCall from multiple shareholders none of which held 50% or more of GreatCall to GC Buyer, Inc. See File No. ITC-T/C-20180718-00145.

As explained in GreatCall’s application for transfer of control, on July 14, 2017, GC Buyer, Inc. (the Transferee), a Delaware corporation, acquired 100 percent of the outstanding stock of GreatCall. GC Holding Company, LLC (“GC Holding”), a Delaware limited liability company, owns 100 percent of the equity of GC Buyer, Inc. GTCR Fund XI/A LP, a Delaware limited partnership, holds 64.25 percent of GC Holding, and GTCR Fund XI/C LP, a Delaware limited partnership, holds 16.19 percent of GC Holding. The Washington State Investment Board, which provides for the investment of funds of Washington state public employees, owns 11.12 percent of GTCR Fund XI/A LP. The officers and directors of GC Buyer (all of whom were disclosed in the application and all of whom are United States citizens), have day to day control of GC Buyer. There are no other 10 percent or more direct or indirect shareholders.

The 2017 transfer of control occurred when GreatCall accepted funding from private equity funds managed by GTCR LLC. Because day-to-day management of GreatCall did not change as a result of the investment, GreatCall management did not realize that prior regulatory approval was required, and proceeded to consummate the transaction shortly after an agreement was in place. In connection with an internal review of corporate records with FCC counsel, GreatCall determined that the transfer of control of the Section 214 authority should have been requested.

GreatCall has taken steps to strengthen its internal procedures to ensure that this does not happen again. Specifically, procedures are now in place requiring a regulatory level review and consultation with FCC counsel whenever there is any change in ownership.

The Parties respectfully submit that Commission grant of the STA will serve the public interest, convenience, and necessity by enabling GreatCall to continue to serve its customers. As noted above, the transaction that triggered the transfer of control did not affect GreatCall’s management structure or its day-to-day operations.

The Parties acknowledge that grant of this STA will not prejudice any action that the Commission may take on the underlying application. The Parties further acknowledge that this STA can be modified or revoked by the Commission upon its own motion without a hearing.