

Justification for Request for Special Temporary Authority

LKN Communications, Inc. (“LKN” or “Company”), pursuant to Section 63.25 of the Commission’s rules, 47 C.F.R. §623.25, hereby respectfully requests Special Temporary Authority (“STA”) to provide service to customers currently served by Kynect Communications LTD (“Kynect”) under that company’s international 214 authorization, File No. ITC-214-20140806-00233, pending the Commission’s consideration and final action on a recently filed Application for Assignment of Kynect’s international 214 authorization to LKN (IB2021004307, filed November 12, 2021). That application requests approval for the assignment of Kynect’s international 214 authority to LKN to enable LKN’s wholly-owned subsidiary, Flash Wireless, LLC, (“Flash Wireless”), operating pursuant to LKN’s 214 authority, to provide international resold wireless service to customers transferred from Kynect.

This STA is requested to allow those customers to be transferred from Kynect to Flash while the Assignment application is pending final approval. Temporary authority is needed to avoid a disruption in wireless service to the affected customers. Anticipating the sale of its customer base, Kynect has begun winding down its operations, which includes the termination of its banking relationships and merchant services agreement. It was anticipated that submission and approval of the assignment application to the FCC would have occurred well in advance of those activities. However, delay in submission of the application due to a variety of issues has resulted in a situation in which the termination of Kynect’s critical business relationships will make it virtually impossible for the company to continue to service its customers beyond November 19, 2021.

LKN and Kynect do not intend to fully consummate the transaction until approval by the Commission. However, to avoid disruption in service to the affected customers of Kynect, LKN is requesting temporary authority to serve the customers through its subsidiary, Flash Wireless, under the international 214 authority that is the subject of the assignment, File No. ITC-214-20140806-00233, while the assignment application is pending.

The Company acknowledges that grant of the STA will not prejudice action by the Commission on the underlying assignment application and that the STA is subject to cancellation or modification upon notice without a hearing.

Response to Question 12 – Information required by Section 63.18(i) – (m)

62.18(i):

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

62.18(j):

If this Application is granted, 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 12 above. The list of foreign carriers, all of which are wholly owned by LKN, is included in the third column of the table below.

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.L.	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

62.18(k):

All of the countries listed in response to paragraph (j) above are members of the World Trade Organization.

62.18(l):

Reserved – N/A

62.18(m):

LKN qualifies as a non-dominant carrier between the United States and all of the countries listed above pursuant to Section 63.10(4) of the Commission's rules, because 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.

Response to Section 63.18 (d), (e)(3) and (g)

LKN holds international Global or Limited Global Facilities-Based and Resale Authority under ITC-214-20000203-00052. It operates strictly as a reseller of international services. It seeks temporary authority to provide resold international services through its subsidiary, Flash Wireless, currently provided to customers of Kynect Communications pursuant to Kynect's authorization to provide Global or Limited Global Resale Service under ITC-214-20140806-00233. Subsection (g) is not applicable, as LKN is not seeking facilities-based authorization.