April 7, 2022

Via Electronic Filing
Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Request for Special Temporary Authority Related to the Application for Approval, as Necessary, to Transfer a Controlling Interest in Advanced Network Communications, L.L.C. to Long Lines, LLC, Pursuant to Section 214 of the Communications Act of 1934, as Amended

Dear Secretary Dortch:

Schaller Telephone Company ("Schaller" or "Transferor") and Long Lines, LLC ("Long Lines" or "Transferee"; Transferor and Transferee, collectively, "Applicants"), by their attorneys and pursuant to Section 214 of the Communications Act of 1934, as amended (the "Act"),[1] hereby request special temporary authority ("STA"), for a period of one-hundred and eighty (180) days, to allow Advanced Network Communications, L.L.C. ("Advanced") to continue providing service to customers under the control of Schaller and Long Lines during the pendency of the application for approval of the indirect transfer of control, which was filed in the above-referenced docket on March 25, 2022 (hereinafter, the "Application"). Applicants respectfully request the Federal Communications Commission ("FCC" or "Commission") grant this STA request on an expedited basis.

Effective September 1, 2005, Long Lines acquired a fifty percent (50%) interest in Advanced from Schaller. Long Lines and Schaller continued to operate Advanced as a joint venture arrangement after that time, until the present. Unfortunately, the parties did not secure the Commission's prior consent to the acquisition of such control because they were not aware that the transfer of such interests required prior Commission consent.

A. Background

As explained in the Application, Advanced provides telecommunications services to small, rural communities in Iowa. Specifically, Advanced (FRN 0005919022) provides domestic interstate services pursuant to blanket domestic Section 214 authority, and is seeking authority to provide global resale services as a subsidiary under Long Lines' international Section 214 authorization, pursuant to an application currently pending before the Commission.[1] Advanced has no regulated or unregulated subsidiaries and holds no radio licenses.

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[1] The Application is pending before the Commission (IBFS File No.: ITC-214-INTR2022-01018).

Further, Advanced was originally organized to operate as a subsidiary of Schaller. Going forward, and following Commission consent to the pending Application, the Parties contemplate operating Advanced as a joint venture between Schaller and Long Lines, with each owning 50% of the issued and outstanding equity securities of Licensee. Following Commission consent to the pending Application filed in WCB Docket 22-14,[2] Long Lines will acquire the remaining 50% interest in Advanced. Pursuant to the terms of the joint venture, Long Lines will provide the bulk of technical, operational, and managerial staff for the day-to-day operations of Licensee, while Schaller will continue to provide installation, customer service and trouble ticket resolution.

Schaller (FRN 0018419044) is a rural telephone company (as defined in 47 U.S.C. § 153) that provides high-capacity broadband, video, and domestic interstate services as an incumbent local exchange carrier ("ILEC") in the communities of Schaller, Galva, Cushing, and Kiron (less than 2,000 access lines) in the counties of Sac, Ida, Woodbury, Crawford, Buena Vista and Cherokee in northwest Iowa.

Long Lines (FRN 0015136211) is a Delaware limited liability company organized as a holding company for ILECs, CLECs and cable providers offering broadband, video and voice services in sixteen communities in Iowa, Nebraska, and South Dakota. Long Lines is a wholly owned subsidiary of IH Orbitel, Inc. ("IH Orbitel"), which is itself a wholly owned subsidiary of Schurz Communications, Inc. ("Schurz Communications"). Through the common ownership of Schurz Communications, Long Lines is affiliated (within the meaning of section 3(1) of the Act), with regulated and unregulated service providers, as identified in the pending Application.

B. Public Interest Statement

The Commission's approval of the requested STA will serve the public interest, as it will facilitate the uninterrupted provision of communications services to the current customers of Advanced in rural Iowa who rely on this connectivity for their essential communications services. Good cause exists to grant this STA, which will ensure that consumers would not suffer inconvenience or loss of service, or otherwise be adversely affected.

Approval of the STA and Application further serve the public interest as such approvals will result in Long Lines and Schaller completing the process of transferring control of Advanced to Long Lines (following Commission consent) which has the necessary technical, financial and managerial qualifications to permit the combined company to continue to provide high-quality services to these customers. Further, since consummation of the referenced transaction Advanced has continued to provide high quality, modern telecommunications services to its subscribers in a manner that is transparent to its customers.

Applicants expressly acknowledge that grant of this Request will not prejudice action by the Commission on the underlying 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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[2] Pending Commission consent for the previously filed application in which Schaller and Long Lines proposed to transfer 100% of the interest to Long Lines. *See* WCB Docket 22-14.

C. Conclusion

Wherefore, for the foregoing reasons, Applicants respectfully request that the FCC grant the requested STA for a period of one hundred-eighty (180) days.

Please do not hesitate to contact the undersigned with regard to this request or the proceeding more generally.

Respectfully submitted,

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Exhibit A

Applicant respectfully requests streamlined processing of this Application pursuant to Section 63.12 of the Commission's Rules. 47 C.F.R. 63.12. This Application qualifies for streamlined processing for the following reasons: (1) Applicant is not affiliated with a foreign carrier on any route for which authority is sought; (2) Applicant is not affiliated with any dominant U.S. carrier whose international switched or private lines services it seeks to resell; and (3) Applicant is not requesting authority to provide switched service over private lines to countries not previously authorized for service by the Commission

Exhibit B

In support of Applicant's request for authorization, the following information is submitted pursuant to Section 63.18 of the Commission's Rules:

Response to 63.18(d): The Applicant has not previously received authority under Section 214.

Response to 63.18(e)(3): The Applicant is requesting Section 214 authority to operate as a resale carrier pursuant to § 63.18(e)(2) of this section of the Commission’s rules.

Response to 63.18(g): Not applicable.