

Wilkes Communications, Inc. d/b/a Wilkes Long Distance Service

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

Response:

Wilkes Communications, Inc. d/b/a Wilkes Long Distance Service (“WLD”) respectfully submits that the public interest would be served by a grant of this Special Temporary Authorization (“STA”)¹ pending grant of its application for the transfer of control regarding its Section 63.18(e)(2) (global resale authority), File No. ITC-214-19940705-00214. Thus, prompt action granting this STA will allow WLD’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 transfer of control of WLD’s parent company, Dycom Holding, Inc. (“DHI”). At the time of the transfer of control of DHI, WLD was, and is currently, a wholly-owned subsidiary of DHI.²

Grant of this request for STA will ensure that WLD will be able to continue to provide uninterrupted international resold service. WLD 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. 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 of not seeking Commission actions with respect to the ownership changes arising from the death in 2014 of DHI’s former owner,

¹ WLD and its affiliate, Wilkes Telephone & Electric Company, will also be filing a STA request to continue their respective domestic operations. A copy of this STA request will be provided to the FCC International Bureau once filed.

² WLD has submitted a notification via the Commission’s International Bureau Filing System to update the authorization which, in good faith, it believes it secured in 1994. The request submitted in the IBFS provides the basis for such good faith and requests the update of its current address, current contact information and current name.

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George A. Dyson and the subsequent December 6, 2018 transfer of Mr. Dyson's interest in DHI to his wife, Mrs. April D. Dyson (who was also the Executor of Mr. Dyson's estate), WLD is voluntarily attempting to take all steps necessary to rectify the situation. Accordingly, WLD submits that the public interest would be served by prompt grant of the instant request.

WLD requests 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), WLD respectfully submits that it has, in good faith, been granted international global resale authority under File No. ITC-214-19940705-00214 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.