

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of the Application of)
)
Multi-Link Telecom, LLC)
(now known as Liberty-Bell, LLC))
)
And,)
)
Liberty-Bell Telecom, LLC)
)
For Grant of Authority Pursuant to)
Section 214 of the Communications Act)
of 1934)

File No. ITC-T/C-2010-_____

APPLICATION

A. Introduction

Multi-Link Telecom LLC (“MLT”, now known as Liberty-Bell, LLC) and Liberty-Bell Telecom, LLC (“Liberty-Bell Telecom”, together with MLT, “Applicants”), pursuant to Section 214 of the Communications Act, as amended, 47 U.S.C. § 214, and Sections 63.18 and 63.24 of the Commission’s Rules, 47 C.F.R. §§ 63.18 & 63.24, respectfully request that the Commission grant such authority as may be necessary or required for MLT to acquire control of Liberty-Bell Telecom. Liberty-Bell Telecom is a new entrant competitive local exchange reseller that provides service primarily in Colorado. Liberty-Bell Telecom holds international global resale authority and blanket authority to provide domestic services in the United States.

Applicants respectfully request that the Commission approve this Application expeditiously as possible.

Applicants have already completed the transaction described herein.¹ Applicants emphasize however that the lack of prior approval was inadvertent,² that transaction was completely transparent to customers, and that the transaction involved solely a change in the ownership of Liberty-Bell Telecom and did not affect the services provided by Liberty-Bell Telecom. Furthermore, Liberty-Bell Telecom's international operations were and remain limited, comprising less than 1% of the Company's operations. The transaction did not result in the discontinuance of service offerings to any of Liberty-Bell Telecom's customers. Illustrative charts depicting the current and proposed ownership structure of Liberty-Bell Telecom are provided in Exhibit A.

B. Request for Streamlined Processing.

Applicants respectfully submit that this Application qualifies for presumptive streamlined treatment. Specifically, this Application is eligible for streamlined processing pursuant to Section 63.12(a)-(b) of the Commission's Rules, 47 C.F.R. §63.12(a)-(b). In particular, Section 63.12(c)(1) is inapplicable because Applicants are not and were not affiliated with any entity that is authorized or registered to provide regulated telecommunications services in a foreign destination market. Furthermore, none of the scenarios outlined in Section 63.12(c)(2)-(4) of the Commission's Rules, 47 C.F.R. § 63.12(c)(2)-(4), applied.

¹ Applicants have filed under separate cover a request for Special Temporary Authority for authority to continue to operate pursuant to the corporate structure described herein during the time that this Application is under consideration by the Commission.

² In particular, the transaction was consummated on or about September 13, 2006. At that time, Multi Link Telecom was a provider of various non-telecom services and Liberty-Bell Telecom was not majority owned by any entity. In addition, Liberty-Bell Telecom was (and remains) a small, new entrant carrier still operating essentially in start-up mode. As a result, at the time of the transaction, Applicants were not aware of the need to obtain FCC approval to

C. Statement of Public Interest.

Prompt Commission approval of this Application is consistent with the public interest. Specifically, the transaction at issue did not cause any customer confusion and/or result in any customer discontinuance of service. At the same time, grant of the approval requested herein will permit Applicants to ensure on-going compliance with the Commission's regulatory requirements. In sum, grant of the requested authority will ensure that Liberty-Bell Telecom can continue to provide high-quality telecommunications services which should invigorate competition and thereby benefit consumers of those telecommunications services.

D. Description of the Applicants.

MLT is a limited liability company organized and existing under the laws of the State of Colorado with principal place of business located at 2460 West 26th Avenue, #380-C, Denver, Colorado 80211. In 2008, MLT changed its name to Liberty-Bell, LLC. MLT is the current and ultimate holding company for Liberty-Bell Telecom. MLT currently has no operations and therefore has no employees or customers.

Liberty-Bell Telecom is a competitive local exchange carrier with principal place of business also located at 2460 West 26th Avenue, #380-C, Denver, Colorado 80211. Liberty-Bell Telecom operates by purchasing local and long distance services from Qwest Communications International Inc. and other providers and reselling those services to small business and residential customers located primarily in Colorado. Liberty-Bell Telecom also has limited operations in New Mexico and Utah.

complete the transaction described herein. Upon recently identifying that omission, Applicants promptly sought approval through this Application.

E. Information Required by Section 63.18 and 63.24.

Pursuant to Sections 63.18 and 63.24 of the Commission's Rules, Applicants submits the following information in support of this Application:

(a) Name, address and telephone number of each Applicant:

MLT:

Liberty-Bell, LLC (FRN # 0019781053)
2460 West 26th Avenue, #380-C
Denver, Colorado 80211
Telephone: 303-831-1977

Liberty-Bell Telecom:

Liberty-Bell Telecom, LLC (FRN # 0010436087)
2460 West 26th Avenue, #380-C
Denver, Colorado 80211
Telephone: 303-831-1977

(b) Jurisdiction of Organizations:

MLT:

MLT is a limited liability company formed under the laws of the State of Colorado.

Liberty-Bell Telecom:

Liberty-Bell Telecom is a limited liability company formed under the laws of the State of Colorado.

(c) Correspondence concerning this Application should be sent to:

Please direct all correspondence regarding this Application to:

Edward S. Quill Jr.
Brian McDermott
Synergies Law Group, PLLC
1002 Parker Street
Falls Church, VA 22046
Telephone: 571-730-4970
Facsimile : 571-730-4971
E-mail : equill@synergieslawgroup.com

bmcdermott@synergieslawgroup.com

With copies to:

Nigel V. Alexander, Manager
Liberty-Bell Telecom, LLC
2460 West 26th Ave, Suite 380-C
Denver, CO, 80211
Telephone: 303-831-1977
Facsimile: 303-831-1988
E-mail: nalexander@libertybelltelecom.com

- (d) Liberty-Bell Telecom holds global international resold Section 214 authority pursuant to authority granted by the Commission in IB File No. ITC-214-20080219-00066. Liberty-Bell Telecom also holds blanket domestic interstate Section 214 authority. MLT holds no FCC authorizations.
- (e) Applicants seeks authority to transfer control of Liberty Bell Telecom to MLT. Liberty-Bell Telecom will continue to provide domestic interstate and international telecommunications services to its existing customers and therefore does not seek approval to discontinue any type of service through this Application.
- (f) Not applicable.
- (g) Not applicable.
- (h) Ownership information for Liberty-Bell Telecom is provided below.

Prior Ownership Information of Liberty-Bell Telecom

Prior to the transaction described herein, Liberty-Bell Telecom was not majority owned by any entity.

- (1) The following entities formerly owned or controlled ten percent (10%) or more of **Liberty-Bell Telecom, LLC**:

Name:	Thomas G. Martino 2460 West 26th Avenue, #380-C Denver, Colorado 80211
Citizenship:	U.S.
Equity/Voting Interest:	45%
Principal Business:	Individual

Name:	Robert S. Unger
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2460 West 26th Avenue, #380-C
Denver, Colorado 80211
Citizenship: U.S.
Equity/Voting Interest: 34%
Principal Business: Individual

Name: CK Affiliate Sales LLC
c/o Liberty-Bell Telecom, LLC
2460 West 26th Avenue, #380-C
Denver, Colorado 80211
Citizenship: U.S.
Equity/Voting Interest: 13%
Principal Business: Sales

- (2) The following entity owned or controlled fifty (50%) or more of **CK Affiliate Sales LLC**:

Name: Christopher Kane
c/o Liberty-Bell Telecom, LLC
2460 West 26th Avenue, #380-C
Denver, Colorado 80211
Citizenship: U.S.
Equity/Voting Interest: 100%
Principal Business: Individual

Other than the foregoing, no entity owned or controlled a ten percent (10%) or greater direct or indirect interest in Liberty-Bell Telecom.

Post-Closing Ownership Information

- (1) The following entities owned or controlled ten percent (10%) or more of **Liberty-Bell Telecom, LLC**:

Name: Multi-Link Telecom, LLC
2460 West 26th Avenue, #380-C
Denver, Colorado 80211
Citizenship: U.S.
Equity/Voting Interest: 100%
Principal Business: Holding Company

- (2) The following entities owned or controlled ten percent (10%) or more of **Multi-Link Telecom, LLC**:

Name: Nigel Alexander
2460 West 26th Avenue, #380-C
Denver, Colorado 80211

Citizenship: United Kingdom³
Equity/Voting Interest: 70%⁴
Principal Business: Individual

Name: Thomas G. Martino
2460 West 26th Avenue, #380-C
Denver, Colorado 80211

Citizenship: U.S.
Equity/Voting Interest: 14%
Principal Business: Individual

Name: Robert S. Unger
2460 West 26th Avenue, #380-C
Denver, Colorado 80211

Citizenship: U.S.
Equity/Voting Interest: 10%
Principal Business: Individual

No other entity directly or indirectly owned or controlled 10% or more of Liberty-Bell Telecom.

Applicants have no (and haven't had any) interlocking directorates with foreign carriers.

- (i) Applicants are not and have not been affiliated with any foreign carriers.
- (j) Applicants certify that following the transaction, Liberty-Bell Telecom was not affiliated with any foreign carriers. Applicants certify that Liberty-Bell Telecom does not and did not provide international telecommunications services to any destination country where:
 - (1) Liberty-Bell Telecom was a foreign carrier in that country; or
 - (2) Liberty-Bell Telecom controls a foreign carrier in that country; or
 - (3) Any entity that owns more than 25 percent of Liberty-Bell Telecom, or that controls Liberty-Bell Telecom, controls a foreign carrier in that country; or
 - (4) Two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate more than 25 percent of Liberty-Bell Telecom and are parties to, or the beneficiaries of, a contractual relation affecting the

³ Mr. Alexander, a legal resident of the U.S. for the last 19 years, has applied for U.S. citizenship. That application is currently pending before the U.S. Immigration and Naturalization Service and is expected to be routinely approved.

⁴ The operating agreement for MLT requires ownership of at least 80% to make material changes to that company. Mr. Alexander has never held an interest of that magnitude.

provision or marketing of international basic telecommunications services in the United States.

- (k) Not applicable.
- (l) Not applicable.
- (m) Not applicable.
- (n) Applicants certify that they have not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route and will not enter into such agreements in the future.
- (o) Applicants certify that they are not subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1998. See 21 U.S.C. § 853a. *See also* 47 C.F.R. §§ 1.2001-1.2003.
- (p) With respect to international authority, this Application is eligible for streamlined processing pursuant to Section 63.12(a)-(b) of the Commission's Rules, 47 C.F.R. §63.12(a)-(b). In particular, Section 63.12(c)(1) is inapplicable because Applicants are not affiliated with any entity that is authorized or registered to provide regulated telecommunications services in a foreign destination market. Furthermore, none of the scenarios set outlined in Section 63.12(c)(2)-(4) of the Commission's Rules, 47 C.F.R. § 63.12(c)(2)-(4), apply.

G. Conclusion.

For the reasons stated above, Applicants respectfully asserts that the public interest, convenience and necessity would be furthered by the grant of this Application. Applicants, therefore, respectfully request that the Commission consider and approve this Application under streamlined processes and grant such other relief or authority as may be necessary in connection with the transaction described herein.

Respectfully submitted,



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Counsel for Applicants

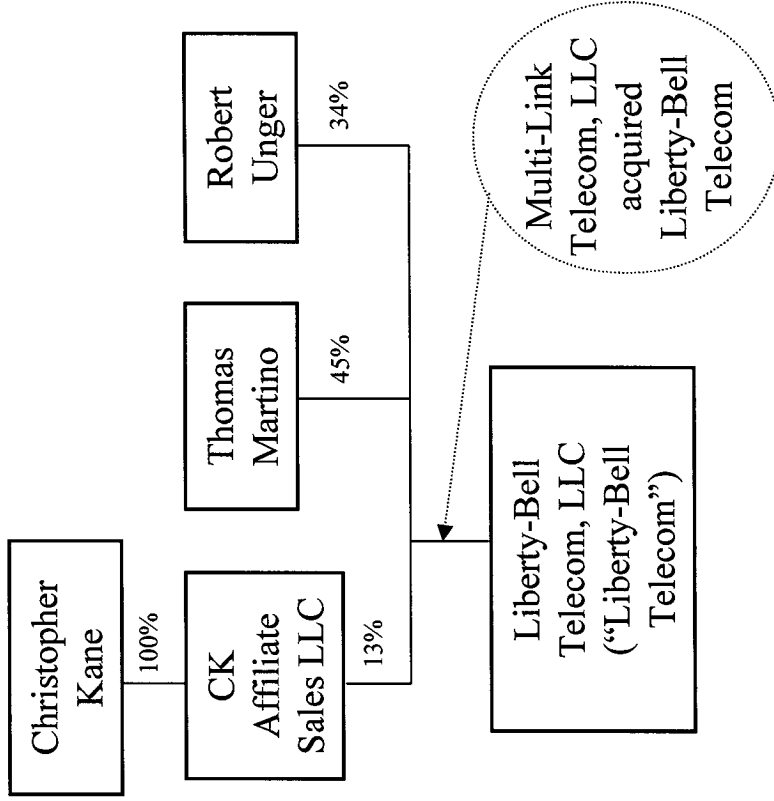
Dated: May 24, 2010

EXHIBIT A

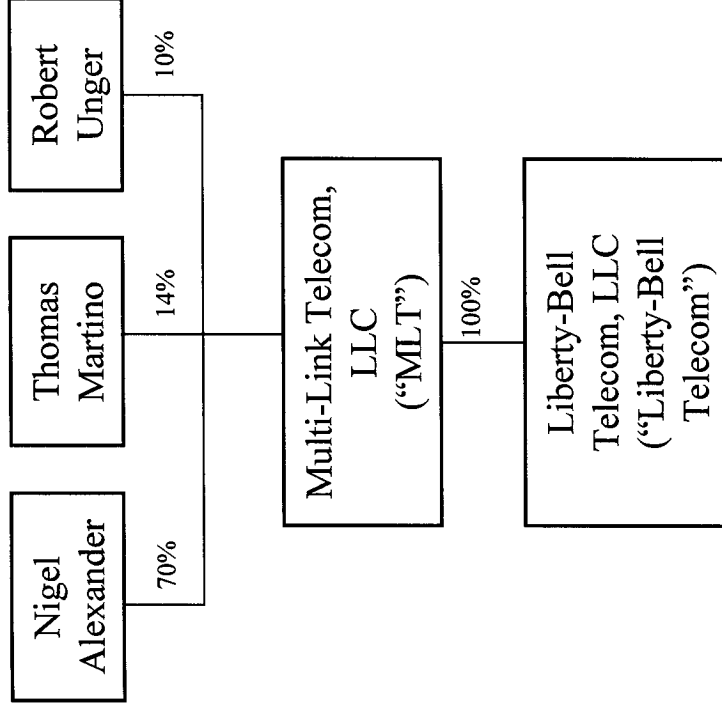
Illustrative Chart

Illustrative Chart

Prior to Transaction




Post Transaction



STATE OF COLORADO)
) ss.
COUNTY OF DENVER)

VERIFICATION

I, Nigel Alexander, state that I am the Manager of Liberty-Bell, LLC; that I am authorized to make this Verification on behalf of Liberty-Bell, LLC (formerly Multi-Link Telecom, LLC) and Liberty-Bell Telecom, LLC; and that the foregoing filing was prepared under my direction and supervision; and that the contents are true and correct to the best of my knowledge, information, and belief.



Nigel Alexander
Manager
Liberty-Bell, LLC

Sworn and subscribed before me this 21st day of May 2010

[Seal or Stamp]



Notary Public



[Printed Name]

My appointment expires _____ My Commission Expires
September 25, 2012