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April 17, 2015

**Via IBFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-A325  
Washington, DC 20554  
Attn: International Bureau (via IBFS)

**Re: Notification Regarding Involuntary Change in Indirect Ownership of Sirius  
Telecommunications, Inc.**

Dear Ms. Dortch:

Sirius Telecommunications, Inc. (“Sirius Telecom”), by undersigned counsel and pursuant to 47 C.F.R. § 63.24(f) and (g), notifies the Commission that an involuntary change in its ownership that occurred on or about November 7, 2011 (the “*Involuntary Change*”) in connection with the death of Christopher E. Edgecomb. Specifically, at the time of Mr. Edgecomb’s death, Sirius Telecom was directly wholly owned by the Christopher E. Edgecomb Living Trust (the “CEE Trust” or “Transferor”) whose sole Trustee was Mr. Edgecomb.<sup>1</sup> In accordance with the terms of the living trust, CEE Trust’s ownership interest was transferred to The Maryann F. Edgecomb Living Trust (“MFE Trust” or “Transferee”) whose sole Trustee is Maryann F. Edgecomb, the widow of Mr. Edgecomb.<sup>2</sup>

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<sup>1</sup> As described below, Sirius Telecom also notifies the Commission of a *pro forma* change in its direct ownership.

<sup>2</sup> Importantly, the primary beneficiary of the CEE Trust was the MFE Trust. The contingent beneficiaries of the CEE Trust were the same as the primary beneficiaries of the MFE Trust.

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**Information Required by Section 63.24(f)(2)**

As required by Section 63.24(f)(2), Sirius Telecom provides the following information required by 63.18(a) through (d) and (h):

**Sections 63.18(a):** Name, address and telephone number of the Parties:

Sirius Telecommunications, Inc.  
1933 Cliff Drive, Suite 28  
Santa Barbara, CA 93109  
Tel: 805-690-2800

Christopher E. Edgecomb, Trustee  
Christopher E. Edgecomb Living Trust  
Maryann F. Edgecomb, Trustee  
The Maryann F. Edgecomb Living Trust  
c/o Sirius Telecommunications, Inc.  
1933 Cliff Drive, Suite 28  
Santa Barbara, CA 93109  
Tel: 805-690-2800

**Sections 63.18(b):** Organization of the Parties:

Sirius Telecom is a California corporation.

Transferee is a California trust.

Maryann F. Edgecomb is a U.S. citizen.

Transferor was a California trust.

Christopher E. Edgecomb was a U.S. citizen.

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Section 63.18(c): Correspondence concerning this filing should be sent to the Parties' counsel:

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Section 63.18(d): Sirius Telecom holds international Section 214 authority to provide global or limited global facilities-based and resale services granted in IB File No. ITC-214-20010426-00267.<sup>3</sup>

Sections 63.18(h): See Attachment 1 for the ownership of Sirius Telecom.

Sirius Telecom certifies that because the beneficiary of the CEE Trust is the trustee of the MFE Trust, the Involuntary Change was *pro forma* and that, together with all previous *pro forma* transactions,<sup>4</sup> did not result in a change in the actual controlling party of Sirius Telecom.

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<sup>3</sup> Sirius Telecom also holds the following Signaling Point Code authorizations: SPC-NEW-20020115-00002, SPC-NEW-20021210-00038, and SPC-NEW-20030507-00020

<sup>4</sup> At some indeterminate date before Mr. Edgecomb's death, Sirius Holdings, Inc. ("Holdings"), a California corporation, was removed as a holding company between Sirius Telecom and CEE Trust (the "*Pro Forma* Change"). As a result, Sirius Telecom became 100% directly owned by CEE Trust; previously CEE Trust indirectly owned 100% of Sirius Telecom as the direct 100% owner of Holdings. Since the ultimate ownership of Sirius Telecom did not change, the removal of Holdings from the chain of ownership was *pro forma* in nature.

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This notification letter is being filed electronically via MyIBFS. Please direct any questions to the undersigned.

Respectfully submitted,

/s/ Brett P. Ferenchak

Douglas D. Orvis II  
Brett P. Ferenchak

Counsel for Sirius Telecommunications, Inc.

## ATTACHMENT 1

### Answer to Question 11 - Section 63.18(h) Ownership Information

As a result of the *Involuntary Change*, the following entities hold, directly or indirectly, a 10% or greater interest<sup>1</sup> in Sirius Telecommunications, Inc. as calculated pursuant to the Commission ownership attribution rules for international telecommunications carriers:

Name:	The Maryann F. Edgecomb Trust (“MFE Trust”)
Address:	c/o Sirius Telecommunications, Inc. 1933 Cliff Drive, Suite 28 Santa Barbara, CA 93109
Citizenship:	U.S. (California)
Principal Business:	Investments
% Interest:	100% (directly in Sirius Telecom)

Maryann F. Edgecomb is the sole Trustee of the MFE Trust. She is a U.S. citizen and can also be reached at Sirius Telecom’s address.

### Answer to Question 12 - Section 63.18(h) Interlocking Directorates

Sirius Telecom does not have any interlocking directorates with a foreign carrier.

### Answer to Question 13 - Description of the *Involuntary Change*

On or about November 7, 2011, there was an involuntary change in direct ownership of Sirius Telecommunications, Inc. (“Sirius Telecom”) (the “*Involuntary Change*”) in connection with the death of Christopher E. Edgecomb.<sup>2</sup> At the time of Mr. Edgecomb’s death, Sirius Telecom was wholly owned by the Christopher E. Edgecomb Living Trust (the “CEE Trust” or “Transferor”) whose sole Trustee was Mr. Edgecomb. Following Mr. Edgecomb’s death and in

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<sup>1</sup> Unless otherwise indicated, the ownership interests provided herein represent both equity and voting interests.

<sup>2</sup> At some indeterminate date before Mr. Edgecomb’s death, Sirius Holdings, Inc. (“Holdings”), a California corporation, was removed as a holding company between Sirius Telecom and CEE Trust (the “*Pro Forma Change*”). As a result, Sirius Telecom became 100% directly owned by CEE Trust; previously CEE Trust indirectly owned 100% of Sirius Telecom as the direct 100% owner of Holdings. Since the ultimate ownership of Sirius Telecom did not change, the removal of Holdings from the chain of ownership was *pro forma* in nature.

accordance with the terms of the CEE Trust, CEE Trust's ownership interest in Sirius Telecom was transferred to The Maryann F. Edgecomb Living Trust ("MFE Trust" or "Transferee") whose sole Trustee is Maryann F. Edgecomb, the widow of Mr. Edgecomb.<sup>3</sup> Therefore, the MFE Trust directly wholly owns Sirius Telecom and Ms. Edgecomb indirectly controls Sirius Telecom as the Trustee of MFE Trust.

Due to the nature of the *Involuntary Change* and further administrative oversight, this filing was not made within 30 days of its occurrence, as required by Section 1.948(c)(1) of the rules, 47 C.F.R. § 1.948(c)(1).<sup>4</sup> The failure to timely file was entirely inadvertent and there was no intent to violate or flout any Commission rule; rather, the Parties take their responsibilities to comply with the Commission's rules, including the rules regarding involuntary assignments and transfers of control, very seriously. And, Sirius Telecom has implemented procedures to ensure that similar oversights do not occur in the future. Aside from failing to timely submit filings for the *Involuntary Change* and prior *Pro Forma* Change, Sirius Telecom has otherwise been operated in compliance with the Commission's rules and procedures.

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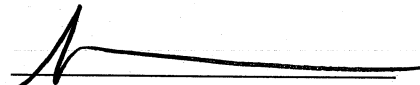
<sup>3</sup> Importantly, the primary beneficiary of the CEE Trust was the MFE Trust. The contingent beneficiaries of the CEE Trust were the same as the primary beneficiaries of the MFE Trust.

<sup>4</sup> Similarly, Sirius Telecom did not timely notify the Commission of the *Pro Forma* Change due to an administrative oversight.

## VERIFICATION

I, Maryann F. Edgecomb, state that I am CEO of Sirius Telecommunications, Inc. (“Sirius Telecom”); that I am authorized to make this Verification on behalf of the Sirius Telecom; 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.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of April, 2015.

  
Maryann F. Edgecomb  
CEO  
Sirius Telecommunications, Inc.