



December 4, 2015
Via IBFS

Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

RE: ITC-T/C-20151105-00252; Equivoice Holdings, Inc. Application for Authorization to Transfer Control

Dear Secretary Dortch:

Pursuant to a conversation with FCC International Bureau staff in conjunction with the filing referenced above, this letter provides additional information and clarification regarding the 214 international authorities of Equivoice Holdings, Inc. A description of prior filings and actions is provided below.

ITC-214-20051102-00446 was originally granted to Equivoice, Inc. on 11/18/2005 (DA No. 05-3041). At that time, there were four owners of Equivoice, Inc., each holding a 25% ownership share: Marcus McEwen, Scott Grau, Richard Pierce, and Michael Marks.

On January 1, 2014, Equivoice Holdings, Inc. was formed as a holding company of Equivoice Inc.¹ On the same date, Mr. Marks sold his 25% interest in Equivoice, Inc. to Equivoice Holdings, Inc., with the result that Mr. Grau, Mr. Pierce and Mr. McEwen each owned 33.33% of Equivoice Holdings, Inc. A proforma assignment application was filed, with a 1/1/2014 effective date, to assign ITC-214-20051102-00446 from Equivoice, Inc. to its new parent, Equivoice Holdings, Inc. (ITC-ASG-20140109-00007; DA No. 14-76). However, that filing did not include an explanation of the change in ownership that occurred at the time of the transaction as a result of Mr. Marks relinquishing his 25% ownership share. No other proforma notification of the ownership change was filed, as the Company's owners were unaware of a requirement to do so. Through this submission, the Applicant seeks to clarify the FCC's records regarding that transaction.

On 3/28/2014 approval was granted for a partial assignment of ITC-214-20051102-00446, held by Equivoice Holding, Inc. to Equivoice, Inc. (ITC-ASG-20140303-00059) and for a transfer of control of Equivoice Holdings, Inc. (ITC-T/C-20140303-00063) (DA No. 14-451). As a result of the latter filing, Mr. McEwen's 33.33% ownership interest was split between Mr. Grau and Mr. Pierce, such that Mr. Grau and Mr. Pierce each now own 50% of Equivoice Holdings.

In the instant application, ITC-T/C-20151105-00252, Equivoice Holdings requests authority to transfer Mr. Pierce's 50% ownership to Mr. Grau, such that following the transaction, Mr. Grau will own 100% of Equivoice Holdings.

Sincerely,

/s/ Sharon Thomas

Sharon Thomas
Consultant to Equivoice Holdings, Inc.

¹ At that time, Equivoice Holdings also became the owner of another subsidiary, Equivoice Cruise.