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May 12, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

Re: WC Docket No. 16-144

Domestic Section 214 Application Filed for the Transfer of Indirect Control of ANPI Business, LLC and ANPI, LLC to Onvoy, LLC

IB File Nos. ITC-T/C-20160422-00145 & ITC-T/C-20160422-00146

Application Filed for Consent to the Transfer of Control of International Section 214 Authorizations held by ANPI Business, LLC and ANPI, LLC to Onvoy, LLC

SUPPLEMENT

Dear Ms. Dortch:

By this letter, Onvoy, LLC ("Onvoy" or "Transferee"); ANPI Business, LLC ("ANPI-Biz"); ANPI, LLC (together with ANPI-Biz, the "Licensees"); Zone USA, Inc. ("Zone"); ANPI Holding, Inc. ("ANPI Holding" and together with Zone, the "Transferors") (collectively, "Applicants") supplement the above-referenced Application. Initially, Onvoy notifies the Commission that the *GTCR Transaction* was completed on April 29, 2016. See WC Docket No. 16-20 and IB File No. ITC-T/C-20160119-00042.

Also, Applicants provide a clarification and additional information regarding the Domestic Section 214 Application's qualification for streamlining pursuant to Section 63.03 of the Commission's rules. First, the transfer of indirect control of Licensees to Transferee qualifies for streamlining pursuant to Section 63.03(b)(2)(i) because immediately following the *ANPI Transaction* (i) Transferee (and its Affiliates, as defined in the Act) will have market share in the interstate, interexchange market of less than ten percent (10%) and (ii) Transferee and Licensees are all non-dominant with respect to all services they provide.

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However, it is unclear whether the indirect transfer of control of ANPI, LLC's interest in Common Point LLC ("Common Point") to Transferee qualifies for streamlining pursuant to Section 63.03(b)(2)(i) because Common Point is affiliated with an incumbent local exchange carrier ("ILEC") through certain of its members, as described below. As stated in the Application, Common Point is equally owned by its four members: ANPI, LLC; Egyptian Internet Services, Inc. ("Egyptian"), an Illinois corporation; Cass Switch, Inc. ("Cass Switch"), an Illinois corporation; and MTCO Communications, Inc. ("MTCO"), an Illinois corporation. The current and post-ANPI Transaction ownership of ANPI, LLC is provided in the Application.

Egyptian is wholly owned by Egyptian Communication Services, Inc. ("ECSI"), an Illinois corporation, which in turn is wholly owned by Egyptian Telephone Cooperative Association ("ETCA"), an Illinois cooperative association. No individual member of ETCA owns or controls 10 percent or more of ETCA. ETCA is an ILEC that serves the following Illinois exchanges: Baldwin, Blair, Glenn, Oakdale, Rice, St. Libory and Venedy. Common Point is therefore affiliated with an ILEC, ETCA.

Cass Switch is 51% owned by Gerald S. Gill and 49% owned by Gerald E. Gill, both U.S. citizens. To Applicants' knowledge, the owners of Cass Switch also own Cass Telephone Company ("Cass Tel"), an Illinois corporation. Cass Tel is an ILEC that serves the following Illinois exchanges: Easton, Chandlerville, Virginia and Ashland.

MTCO is wholly owned by MTCO Corporation, an Illinois corporation. No person or entity owns or controls 10 percent of Common Point through MTCO Corporation. To Applicants' knowledge, the following wholly owned subsidiaries of MTCO Corporation are ILECs in Illinois: Metamora Tel. Co. ("Metamora") and The Marseilles Telephone Company of Marseilles Illinois ("Marseilles"). Metamora, an Illinois corporation, is an ILEC in the Metamora and German Town Hills exchanges. Marseilles, an Illinois corporation, is an ILEC in the Marseilles exchange.

While Common Point provides tandem services to other carriers in the exchanges of the ILECs listed above, Onvoy, Licensees and Common Point do not otherwise provide telephone exchange or exchange access services in any of those exchanges.

While ETCA is in the chain of ownership of Common Point, Cass Tel, Metamora and Marseilles are not. Because Common Point is affiliated with ETCA and may be considered affiliated with Cass Tel, Metamora and Marseilles, Applicants requested streamlined treatment pursuant to Section 63.03(b)(2)(ii) of the Commission's rules in the event the Commission considers Common Point an Applicant. Otherwise, the Application qualifies for streamlined treatment pursuant to Section 63.03(b)(2)(i).

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Please do not hesitate to contact us and counsel for Licensees and Transferors with any additional questions.

Respectfully submitted,

/s/ Brett P. Ferenchak

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