

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

In the Matter of)
)
Business Network Long Distance Inc.)
Licensee) WC Docket No. _____
)
Application for Consent to Transfer Control of)
Company Holding International Section 214 Authority)
And Blanket Domestic Section 214 Authority)
Pursuant to the Communications)
Act of 1934, as Amended)

To: Wireline Competition Bureau

**STREAMLINED APPLICATION FOR AUTHORITY TO TRANSFER CONTROL OF
COMPANY HOLDING INTERNATIONAL AND DOMESTIC BLANKET SECTION 214
AUTHORITY**

Business Network Long Distance, Inc. (“Licensee”), pursuant to Section 214 of the Communications Act of 1934,¹ as amended, and Sections 63.03, 63.04, and 63.24 of the Commission’s Rules,² hereby requests consent to the transfer of ultimate control of Licensee, holder of international and domestic 214 authority, as part of an internal reorganization of Licensee. Brian Curtiss, owns and controls Licensee. Under this reorganization of the ownership of the Licensee ultimate control of Licensee will transfer from Brian H. Curtiss (“Transferors”) to Mr. Martin Tibbitts (“Transferees”). As explained herein, this application qualifies for streamlined processing pursuant to Section 63.03(b)³ of the Commission’s Rules.

¹ 47 U.S.C. § 214.

² 47 C.F.R. §§ 63.03, 63.04, and 63.24.

³ 47 C.F.R. § 63.03(b).

In accordance with the requirements of Section 63.04(a) of the Commission's Rules, the

Applicants submit the following information:

1. Name address and telephone number of each applicant:

Licensee:

Business Network Long Distance, Inc.
1400 Sixteenth Street, Suite 400,
Denver, CO 80202
(800) 421-9739

Transferor:

Business Network Long Distance, Inc.
Brian H. Curtiss
1400 Sixteenth Street, Suite 400
Denver, CO 80202
(800) 421-9739

Transferee:

Martin Tibbitts
19992 Kelly Road
Harper Woods, MI 48225
877-554-7958

2. Government, state or territory under the laws of which each corporate or partnership applicant is organized:

Business Network Long Distance, Inc. is a privately held Nevada corporation.

3. Name, title, post office address, and telephone number of the officer or contact person to whom correspondence concerning the application is to be addressed:

Kenny Perkins, Sr.
Chairman / CEO
RTC Associates, LLC
Consultant to Business Network Long Distance, Inc.
Telephone: 678.436.5590 Ext. 301
Fax: 888.315.4278
kperkins@rtcteam.net

4. **Name, address, citizenship and principal business of any person or entity that directly owns at least ten (10) percent of the equity of the applicant, and the percentage of equity owned by each of those entities:**

Transferor:

The following individual is the transferor.

Brian H. Curtiss
Business Network Long Distance, Inc.
1400 Sixteenth Street, Suite 400
Denver, CO 80202
(800) 421-9739

Owns and seeks to transfer 100% of Stock of Business Network Long Distance, Inc. to Transferee.

Transferee:

The following individual is the transferee.

Martin Tibbitts
19992 Kelly Road
Harper Woods, MI 48225
877-554-7958
Country of Citizenship: United States
Principal Business: Investor and Telecommunications

Seeks to purchase 100% of Stock of Business Network Long Distance, Inc. from Transferor.

5. **Certification pursuant to 47 C.F.R. §§ 1.2001 through 1.2003 that no party to the application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988:**

Applicants certify, pursuant to 47 C.F.R. §§1.2001 through 1.2003, that no party to the present application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988. Applicants certify that this certification is true, complete and correct to the best of their knowledge and belief, and is made in good faith.

6. Description of the Transaction:

Pursuant to a Purchase Agreement ("Agreement"), the Buyer will purchase 100% of the shares of Common Stock of Business Network Long Distance, Inc for a sum of \$1,000, payable immediately in cash upon closing. Closing will occur within five (5) days of completion of all regulatory approvals and/or notifications required for the subject transaction.

7. Description of the geographic areas in which Assignor and Assignee (and their affiliates) offer domestic telecommunications services, and what services are provided in each area:

Transferor:

Transferor currently holds 100% stock in Licensee. The Licensee is an interexchange reseller providing resold interexchange services to customers in thirty-six states, on an intrastate, and interstate and international basis. Licensee holds 214 International Authority as granted on January 9, 2003 in ITC-214-20021216-00586 by this Commission.

Transferee:

Transferee does not currently hold an interest in any domestic telecommunications services.

8. Statement as to how the application fits into one or more of the presumptive streamlined categories in section 63.03 or why it is otherwise appropriate for streamlined treatment:

This application fits within the presumptive streamlined categories as outlined in 47 CFR § 63.03 and streamlined treatment is requested. Transferee is a reseller of long distance services and is not a facility based provider. Neither Transferee nor Transferor hold any interest in any other telecommunications provider. The Commission has determined that transactions such as this that involve a transferee that is non-dominant with respect to any service provided, and has a market share in the interstate, interexchange market of less than 10 percent do not raise the

potential of competitive harm.¹ Additionally, neither Transferee nor Licensee are affiliated with a foreign carrier and neither seeks authority to resell the international or private line services of any affiliated dominant U.S. carrier.

9. Identification of all other Commission applications related to the same transaction:

None.

10. Statement of whether the applicants are requesting special consideration because either party to the transaction is facing imminent business failure:

No party to the transaction is facing imminent business failure.

11. Identification of any separately filed waiver requests being sought in conjunction with the transaction:

No separately filed waiver requests are being sought in conjunction with the proposed transaction.

12. Statement showing how grant of the application will serve the public interest, convenience and necessity, including any additional information that may be necessary to show the effect of the proposed transaction on competition in domestic markets:

The proposed transaction will serve the public interest by ensuring that Licensee will remain fully capitalized through resources provided by Mr. Martin Tibbitts. The instant proposed transaction will ensure that the proper corporate and financial structure remains in place for the Licensee to operate.

The proposed transaction will have no adverse impact on current customers, and will be virtually transparent to customers in terms of the service they now receive. Customer rates, terms and conditions will not change because of this transaction. The transaction is a stock purchase

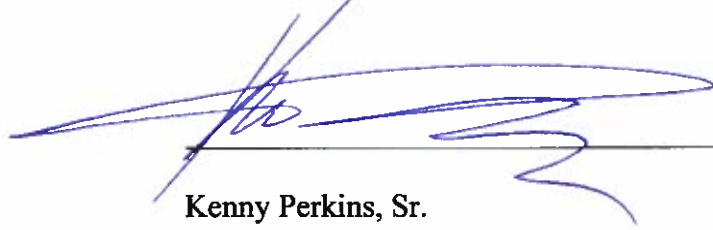
¹ See *Implementation of Further Streamlining Measures for Domestic Section 214 Authorizations*, Report and Order, 17 FCC Rcd 5517 ¶ 29 (2002).

only and the Company's business practices, customer service offerings, and/or customer billing will remain the same post transaction. The proposed transaction also raises no competitive issues, and there will be no reduction of competition in the service areas.

Conclusion

For the foregoing reasons, Applicant respectfully submits that the public interest, convenience and necessity would be furthered by the grant of this Application. Applicants respectfully request streamlined and expedited treatment to permit the Applicants to consummate the proposed transaction as soon as possible.

Respectfully Submitted,



Kenny Perkins, Sr.
Chairman / CEO
RTC Associates, LLC
Consultant to Business Network Long Distance, Inc.
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