

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

In the Matter of )  
)  
Gridley Telephone Company, )  
and )  
Gridley Communications, Inc. )  
)  
*Transferors,* ) File No. \_\_\_\_\_  
)  
and )  
)  
Egyptian Communication Services, Inc. )  
*Transferee.* )  
)  
For Consent to Transfer Control pursuant to Section 214 )  
of the Communications Act of 1934, as amended )

**JOINT APPLICATION FOR TRANSFER OF CONTROL OF  
DOMESTIC AND INTERNATIONAL AUTHORIZATIONS**

Gridley Telephone Company (“GTC”) and Gridley Communications, Inc. (“GCI”) and their immediate parent company Mail Holdings, Inc. (collectively “Transferors”) and Egyptian Communication Services, Inc. (“Transferee” or “ECSI”) hereby request authorization for the transfer of control of GTC and GCI to ECSI. (Transferors and Transferee collectively referred to as the “Applicants” or individually as an “Applicant.”) This Application is being filed simultaneously with the International Bureau and the Wireline Competition Bureau. Applicants submit that prompt grant of both applications will serve the public interest.

**I. Background**

GTI is a rural incumbent local exchange carrier (“ILEC”) operating in a discrete area of north central Illinois, providing local exchange and exchange access service to approximately 765 residential and 310 business access lines in such rural area. GTI is a wholly-owned subsidiary of Mail Holdings. GCI is a reseller of long distance services operating in and around

the service area of GTC. GCI provides its resold long distance service to approximately 824 customers. GCI is a wholly-owned subsidiary of Mail Holdings, Inc.

ECSI is a wholly-owned subsidiary of Egyptian Telephone Cooperative Association (“ETCA”). ETCA is a rural ILEC operating in discrete areas in the southwest corner of the State of Illinois, providing local exchange and exchange access service to approximately 1,950 residential and 390 business access lines in such rural area. ECSI also operates as a reseller of long distance services in and around the areas service by ETCA. ECSI provides its resold long distance service to approximately 2,240 customers.

Pursuant to the proposed transaction, ECSI will purchase from Mail Holdings, Inc., 100% of the ownership interest of GTC and of GCI.<sup>1</sup> After the contemplated transaction, GTC and GCI will continue to exist and operate in their respective service territories, under the same names, and providing service pursuant to existing rates, terms and conditions. The proposed transactions will, accordingly, be transparent to consumers.

## **II. Description of the Transaction**

This application proposes the transfer of control of the Section 214 authorizations held by GTC and GCI to ECSI through the purchase of each of these companies’ stock from Mail Holdings, Inc. The Applicants have also sought authorization from the Illinois Commerce Commission to conduct the proposed transaction.

After the proposed transaction, GTC and GCI will continue to operate in the same service territory, and under the same names. GTC and GCI will continue to offer their respective services pursuant to their respective current rates, terms and conditions. No carrier change

---

<sup>1</sup> As part of the underlying transaction, ECSI will also purchase from Mail Holdings, Inc., the 100% of its stock of Gridley Cable, Inc., a sister company to GTI and GCI.

charges are associated with the transaction, and no customer service or billing contact information will change as a result of the transfer. The transaction will not affect customers' preferred carrier freezes.

### **III. Transfer of Control of International Section 214 Authorization**

Applicant GCI resells switched international long distance toll services to residential and business customers pursuant to an international Section 214 authorization granted by the Commission under File No. ITC-214-19960315-00004.<sup>2</sup> In accordance with the requirements of Section 63.24(e) of the Commission's Rules, Applicants submit the following information:

**(1) Name, address and telephone number of each applicant.**

**Transferors:**

Gridley Telephone Company  
Gridley Communications, Inc.

108 East Third Street  
Gridley, Illinois 61744  
Phone: (309) 747-2221  
Fax: (309) 747-2888

**Transferee:**

Egyptian Communication Services, Inc.  
1010 W. Broadway  
Steeleville, Illinois 62288  
Phone: (618) 774-1000  
Fax: (618) 774-1025

---

<sup>2</sup> The information contained herein references both Gridley Telephone Company ("GTC") and Gridley Communications, Inc. ("GCI"). The combined GTC and GCI information is provided because it is relevant to the Applicants' responses in Section IV *infra* regarding the transfer of the GTC and GCI domestic Section 214 authorizations. As noted in this Section III, the only international authorization is that held by GCI. GTC has no international Section 214 authorization.

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

GTC and GCI are each corporations organized under the laws of the State of Illinois.

Mail Holdings, Inc. is a corporation organized under the laws of the State of Delaware. ECSI is a corporation organized under the laws of the State of Illinois.

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

For Gridley Telephone Company and Gridley Communications, Inc.:

Mr. Charles T. Lake, Managing Director  
Signal Equity Partners II, L.P.  
805 Third Avenue, Suite 1460  
New York, NY 10022  
[clake@signal-equity.com](mailto:clake@signal-equity.com)  
Phone: (646) 580-3195  
Fax: (212) 208-4433

For Egyptian Communication Services, Inc.:

Mr. Kevin J. Jacobsen  
Chief Executive Officer  
Egyptian Communication Services, Inc.  
1010 W. Broadway  
Steeleville, Illinois 62288  
[kjacobs@egyptian.net](mailto:kjacobs@egyptian.net)  
Phone: (618) 774-1000  
Fax: (618) 774-1025

*With a copy to:*

Thomas J. Moorman  
Woods & Aitken LLP  
5151 Wisconsin Ave., N.W., Suite 310  
Washington, DC 20016  
Phone: (202) 944-9502  
Fax: (202) 944-9501

**(4) Statement as to whether the applicants had previously received authority under Section 214 of the Act.**

GTC holds a blanket domestic Section 214 authorization as provided for under 47 C.F.R. § 63.01. GCI holds a blanket domestic Section 214 authorization as provided for under 47 C.F.R. § 63.01 and holds an international Section 214 authorization under File No. ITC-214-19960315-00004. ECSI holds a blanket domestic Section 214 authorization as provided for under 47 C.F.R. § 63.01 and holds an international Section 214 authorization under File No. ITC-96-161. Egyptian Telephone Cooperative Association, Inc., the parent company of ECSI, holds a blanket domestic Section 214 authorization as provided for under 47 C.F.R. § 63.01.

**(5) Name, address, citizenship and principal business of any person or entity that directly or indirectly owns at least ten percent of the equity of the applicant entities.**

**Transferor:**

As noted above, GTC and GCI are each owned 100% by Mail Holdings, Inc.

Mail Holdings, Inc.'s common stock is owned 100% by American Broadband Acquisition Corp. ("ABAC").

ABAC is owned 100% by ABB Holdco, Inc. ("Holdco"), a U.S. corporation organized under the laws of the State of Delaware. The 10% or greater shareholders of Holdco are American Broadband Communications, LLC ("American Broadband") (20%) (a U.S. limited liability company organized under the laws of the State of Delaware), Signal Equity Partners II, L.P. ("Signal") (41.50%) (a U.S. Limited Partnership organized under the laws of the State of Delaware) and SM Investors II, L.P. ("SMI-II") (a U.S. Limited Partnership organized under the laws of the State of Delaware engaged in investments) (12%).

American Broadband's only 10% or greater shareholder is the Estate of Patrick L. Eudy (the "Estate").<sup>3</sup> Signal understands that Ms. Jane R. Eudy is the Personal Representative of the Estate and a U.S. citizen.

---

<sup>3</sup> The Estate is also the indirect 10% or greater owner of the following telecommunications carriers operating in discrete areas of the United States that are outside of the State of Kansas and Georgia: (a) Arlington Telephone Company, a Nebraska corporation and ILEC, that provides local exchange and exchange access services in and around Arlington, Nebraska; (b) The Blair Telephone Company, a Nebraska corporation and ILEC, that provides local exchange and exchange access services in and around Blair, Kennard and Fort Calhoun, Nebraska; (c) Eastern Nebraska Telephone Company, a Nebraska corporation and ILEC, that provides local exchange and exchange access services in and around Walthill, Macy, Winnebago, Rosalie, Osmond, Meadow Grove, Carroll and Belden, Nebraska; (d) Rock County Telephone Company, a Nebraska corporation and ILEC, that provides local exchange and exchange access services in and around Bassett and Newport, Nebraska; (e) HunTel Cablevision d/b/a HunTel Communications, a Nebraska corporation and CLEC, that provides local exchange and exchange access services in and around Lyons, Oakland and Tekamah, Nebraska, and is also an interexchange carrier ("IXC") that resells interstate interexchange and international long distance services throughout the Nebraska areas served by the above-listed affiliated Nebraska ILECs; (f) Holway Telephone Company, a Missouri corporation and ILEC, that provides local exchange and exchange access services in and around Maitland, Missouri; (g) K.L.M. Telephone Company, a Missouri corporation and ILEC, that provides local exchange and exchange access services in and around Rich Hill, Missouri; (h) Holway Long Distance Company, a Missouri corporation and IXC that resells interstate interexchange and international long distance services in and around Maitland, Missouri; (i) KLM Long Distance Company, a Missouri corporation and IXC that resells interstate interexchange and international long distance services in and around Rich Hill, Missouri; (j) Interior Telephone Company, an Alaska corporation and ILEC, that provides local exchange and exchange access services in Alaska; (k) Mukluk Telephone Company, Inc., an Alaska corporation and ILEC, that provides local exchange and exchange access services in Alaska; (l) TelAlaska Long Distance, Inc., an Alaska corporation that resells interstate interexchange and international long distance services; (m) TelAlaska Cellular, Inc., an Alaska corporation that provides mobile voice and data services in Alaska, and is the licensee of Cellular Radio Service Stations WQIQ306, Alaska Rural Service Area 2 – Bethel (Cellular Market Area 316) and WQIQ308, Alaska Rural Service Area 1 – Wade (Cellular Market Area 315); (n) Cameron Communications, LLC ("Cameron Communications"), a Louisiana limited liability company that resells interstate interexchange and international long distance services under the trade name of Cameron Long Distance in the ILEC and CLEC exchanges served by Cameron Telephone Company, LLC ("Cameron Telephone"), Elizabeth Telephone Company, L.L.C. ("Elizabeth") and L.B.H., LLC ("LBH") in Cameron, Allen, Vernon, Rapides and Beauregard Parishes in southwestern Louisiana, and in Jefferson, Chambers, Liberty and Galveston Counties in southeastern Texas; (o) Cameron Telephone, a Louisiana limited liability company and ILEC that provides local exchange telephone and exchange access services in the Cameron, Carlyss, Creole, Grand Chenier, Hackberry, Holly Beach and Johnson Bayou

Signal controls Holdco as Signal is able to designate and has designated the majority of the Board of Directors of Holdco. This control, in turn, has allowed Signal to designate those individuals that oversee the day-to-day operations of GTC and GCI.

At the same time, however, Signal's operations are controlled by its General Partner ("GP"), Signal Equity Advisors, II, LLC ("SEA II").<sup>4</sup> SEA-II owns a 2.94 percent GP interest in Signal. SEA-II owners of 10% or greater are each citizens of the United States and are Timothy P. Bradley (22.3%); Alfred J. Puchala, Jr. (22.3%); Christopher Nolen (19.6%); Malcom C. Nolen (19.6%) and Charles T. Lake II (11.2%).<sup>5</sup>

---

exchanges in Cameron and Calcasieu Parishes in southwestern Louisiana and also provides local exchange telephone and exchange access services in the Nome and High Island exchanges in Jefferson, Chambers, Liberty and Galveston counties in southeastern Texas; (o) Elizabeth, a Louisiana limited liability company and ILEC that provides local exchange telephone and exchange access services in the Elizabeth, Pitkin and Sugartown exchanges in Allen, Vernon, Rapides and Beauregard Parishes in southwestern Louisiana; (p) LBH, a Louisiana limited liability company that provides broadband voice, video and data services as a CLEC in Grand Lake and Sweetlake in Cameron Parish, and in Moss Bluff in Calcasieu Parish, in southwestern Louisiana. In addition, the Estate indirectly has a greater than 10% ownership interest in the following telecommunications carriers: (a) Dialog Telecommunications, Inc., which provides voice and data services as a CLEC in Kentucky, Mississippi and North Carolina; (b) Acorn Telephone LLC, which provides voice and data services as a CLEC in Kentucky; and (c) AMA Communications LLC, which provides voice and data services, resold interstate interexchange and international long distance services, as a CLEC in Texas.

<sup>4</sup> In its pro forma filing in 2009, GCI noted that Garden House LLC (a U.S. limited liability company organized under the laws of the State of Delaware and whose principal business is investment) was the only entity with a non-controlling derivative ownership interest of 10% or greater in GCI. This same ownership structure applied to GTC as well. Garden House, LLC was owned 95% by Eliot Nolen, a U.S. citizen and investor. Garden House, LLC has been dissolved and no entity or individual within Signal now has a derivative ownership interest in GTC or GCI of greater than 10%.

<sup>5</sup> Affiliates of American Broadband and SEA-II also are affiliated with other entities with ownership in other telecommunications carriers operating in discrete areas of the United States including: Georgetown Telephone Company, Inc. ("Georgetown"), a rural ILEC in the State of Mississippi that also through a separate operating division provides resold interstate interexchange and, operating under authority of its parent company, American Georgetown, Inc.,

There are no owners of SMI –II with successive multiplied interests of 10% or greater in GTC or GCI. SMI-II is controlled by S. Muoio & Co. LLC (“SMC”), a U.S. limited liability company, organized under the laws of the State of Delaware. SMC is controlled and operated by Salvatore Muoio, who is a U. S. citizen.<sup>6</sup>

Following closing (1) GTC will continue to operate as an ILEC serving its same respective exchange, and using in its respective operations the same assets as it did prior to the closing and (2) GCI will continue to operate as a provider of resold interstate interexchange and international services in and around the areas served by GTC.

**Transferee:**

ECSI is a wholly-owned subsidiary of Egyptian Telephone Cooperative Association, Inc. (“ETCA”).

ETCA is a telephone cooperative and no individual or entity owns 10% or more of ETCA. Operational control of ETCA and thus ECSI rests with the ETCA Board of Directors and its President and CEO. The individuals comprising the Board of Directors and the President and CEO of ECTA are as follows:

---

international long distance services in and around the areas served by Georgetown); Zenda Telephone Company, Inc. (“Zenda”) (a rural ILEC operating in the State of Kansas); West Side Telecommunications (“West Side”) (a rural ILEC operating in the State of West Virginia); Miller Telephone Co. (Miller”) (a rural ILEC operating in the State of Missouri); and Tel-Atlantic Communications, Inc. (which, through various dba’s provides resold interstate interexchange and international long distance services in and around the service areas of Zenda, West Side, and Miller.

<sup>6</sup> SMC also controls SM Investors, L.P., a U.S. limited partnership organized under the laws of the State of Delaware (“SMI”), and Mr. Muoio. SMI is also controlled by its general partner SMC. SMI has a non-controlling 4% ownership interest in Holdco.



<u>Name</u>	<u>Title</u>	<u>Occupation</u>	<u>Citizenship</u>
Phil Carson	Director	Minister	U.S.
Rudy Eggemeyer	President	Farmer	U.S.
Curtis Wolfe	Director	Retired	U.S.
David Goetting	Vice President	Farmer	U.S.
Jonathan Krause	Director	Service Manager	U.S.
Kenny Hollmann	Asst. Sec/Treas.	Grain Facility Manager	U.S.
David Ibendahl	Director	Farmer	U.S.
Kevin Nurnberger	Director	Retired	U.S.
Susan B. Wennemann	Sec/Treas.	Retired	U.S.
Kevin J. Jacobsen	CEO	Telecom Exec.	U.S.

The address for each of these individuals is: 1010 W. Broadway, Steeleville, Illinois 62288.

ECSI and therefore ETCA have two telecommunications carrier wireless affiliates.<sup>7</sup>

ECSI's ownership in such affiliates is non-controlling.

**(6) Certification as to whether or not Transferee is, or is affiliated with, a foreign carrier.**

ECSI certifies that it is not a foreign carrier in any country, nor is it affiliated with any foreign carrier.

---

<sup>7</sup> Specifically, and as the Commission's records will reflect, ECSI is the owner of a non-controlling interest in: (1) SI Wireless, a holder of several broadband PCS and common carrier microwave licenses as well as the lessee of other spectrum; and (2) in SI Spectrum, a licensee of broadband PCS spectrum.

- (7) **Certification as to whether or not Transferee seeks to provide international telecommunications services to any country for which certain conditions are true.**

ECSI certifies that it does not, through GCI, seek to provide international telecommunications services to any destination country to which 47 C.F.R. § 63.18(j)(1) through (j)(4) applies.

- (8) **Showing regarding provision of international telecommunications service to a country where the applicant is a foreign carrier or is affiliated with a foreign carrier.**

N/A

- (9) **Regulatory classification under Section 63.10 of the Rules for foreign-affiliated carrier.**

N/A

- (10) **Certification that applicant has not agreed to accept special concessions directly or indirectly from any foreign carrier.**

ECSI certifies that it (a) has 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 (b) will not enter into such agreements in the future.

- (11) **Certification pursuant to 47 C.F.R. §§ 1.2001-1.2003 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, 21 U.S.C. § 583.**

Applicants hereby certify, pursuant to 47 C.F.R. §§ 1.2001-1.2003, that to the best of their knowledge, information, and belief, no party to the application is subject to denial of federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 583.

- (12) **Qualification for streamlined processing.**

This Application qualifies for streamlined processing under Sections 63.12(a) and (b) of the Commission's rules. No party is affiliated with any foreign carrier in any destination market.

No party has an affiliation with a dominant US carrier whose international switched or private line services the applicants seek authority to resell, and none is anticipated as a result of the public offering which likely will result in widely held interests. No party to this application seeks authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines. Authorization is sought to complete a public sale that would continue the current operations as a non-dominant carrier reselling the international switched services of one or more unaffiliated US carriers.

#### **IV. Transfer of Control of Domestic Section 214 Authorizations**

Pursuant to Section 63.04(b) of the Commission's Rules, Applicants submit information required pursuant to Sections 63.04(a)(1) through 63.04(a)(12) of the Commission's Rules:

**(1) The name, address and telephone number of each applicant.**

*See* Section III.(1).

**(2) The government, state, or territory under the laws of which each corporate or partnership applicant is organized.**

*See* Section III.(2).

**(3) The name, title, post office address, and telephone number of the officer or contact point, such as legal counsel, to whom correspondence concerning the application is to be addressed.**

*See* Section III.(3).

**(4) The name, address, citizenship and principal business of any person or entity that directly or indirectly owns at least ten (10) percent of the equity of the applicant, and the percentage of equity owned by each of those entities (to the nearest one (1) percent).**

*See* Section III.(5).

- (5) **Certification pursuant to §§1.2001 through 1.2003 of this chapter that no party to the application is subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988. See 21 U.S.C. 853.**

*See* Section III.(11).

- (6) **Description of the transaction.**

Please see Section II.

- (7) **Description of the geographic areas in which the transferor and transferee (and their affiliates) offer domestic telecommunications services, and what services are provided in each area.**

**Transferors:**

GTC is a rural ILEC operating in a discrete area of north central Illinois, providing local exchange and exchange access service to approximately 765 residential and 310 business access lines in such rural area. GCI is a wholly-owned subsidiary of GTC. GCI is a reseller of long distance services operating in and around the service area of GTC. GCI provides its resold long distance service to approximately 824 customers.

**Transferee:**

ECSI is a wholly-owned subsidiary of ETCA. ECSI also operates as a reseller of long distance services in and around the areas service by ETCA. ECSI provides its resold long distance service to approximately 2,240 customers.

- (8) **Statement as to how the application fits into one or more of the presumptive streamlined categories in Section 63.03 of the Commission's Rules or why it is otherwise appropriate for streamlined treatment.**

Applicants request streamlined treatment of this Application in accordance with Sections 63.03(b)(2)(ii) and (iii). With respect to Section 63.03(b)(2)(iii), GTC serves fewer than two (2)

percent of the nation's subscriber lines installed in the aggregate nationwide,<sup>8</sup> and the transaction will result in no new overlapping or adjacent service areas with another incumbent local exchange carrier. *See* Attachment A. With respect to Section 63.03(b)(2)(ii), neither ECSI or the telephone company affiliate of ECSI – ETCA -- provide competitive telephone exchange services or exchange access services within the service area of the current GTC. *See* 47 C.F.R. § 63.03(b)(2)(ii). Moreover, neither GCI nor ECSI provide telephone exchange service or exchange access. *See id.* Thus, the presumptive streamlining of the instant Application is proper under Section 63.03(b)(2)(ii) and (iii) of the Commission's Rules.

**(4) Identification of all other Commission applications related to the same transaction.**

Because Transferors hold no wireless licenses,<sup>9</sup> no applications other than the instant joint application seeking authorization to transfer control of domestic and international 214 authorities will be filed with the Commission.

**(5) Statement of whether the applicants are requesting special consideration because either party to the transaction is facing imminent business failure.**

Neither party to the transaction is facing imminent business failure. Therefore, Applicants are not requesting special consideration for this reason.

---

<sup>8</sup> As of June 30, 2016, the Commission reported that the retail switched access lines were approximately 62,276,000 nationwide. *See Voice Telephone Services: Status as of June 30, 2016* (Industry Analysis and Technology Division, Wireline Competition Bureau, April, 2017), Figure 2. GTC's approximate 1,070 access lines are far less than 2% of the nation's access lines reported by the Commission. Even if ETCA's access lines of approximately 2,240, the combination of GTC's access line counts and that of ETCA results in a total of approximately 3,310 access lines, again far less than 2% of the nation's access lines reported by the Commission.

<sup>9</sup> The Applicants note that Gridley Cable, Inc. holds a receive-only earth station authorization. *See* Call Sign E050250. The authority requires post-consummation notification to the Commission regarding the planned transfer of control Gridley Cable, Inc. to ECSI.

**(6) 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 transaction.

**(7) 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**

Applicants respectfully submit that a grant of this application for the transfer of control of the Companies is in the public interest. Upon consummation of the contemplated transaction, GTC and GCI will continue to provide the same high quality, modern services to their current respective subscribers as those provided today, and will do so in a manner that will render the transfers for which authorization is sought herein transparent to their respective customers. ECSI's management has a demonstrated commitment to the provision of high quality telecommunications services in rural areas of the State of Illinois and will continue and advance that commitment through the operations of GTC and GCI, which commitments will redound to the benefit of GTC and GCI customers.

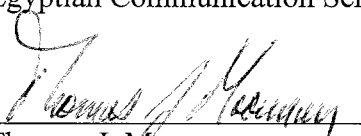
**V. Conclusion**

For the foregoing reasons, the Applicants respectfully the expeditious grant of this Application.

Respectfully submitted,

Gridley Telephone Company  
Gridley Communications, Inc.  
Egyptian Communication Services, Inc.

By:

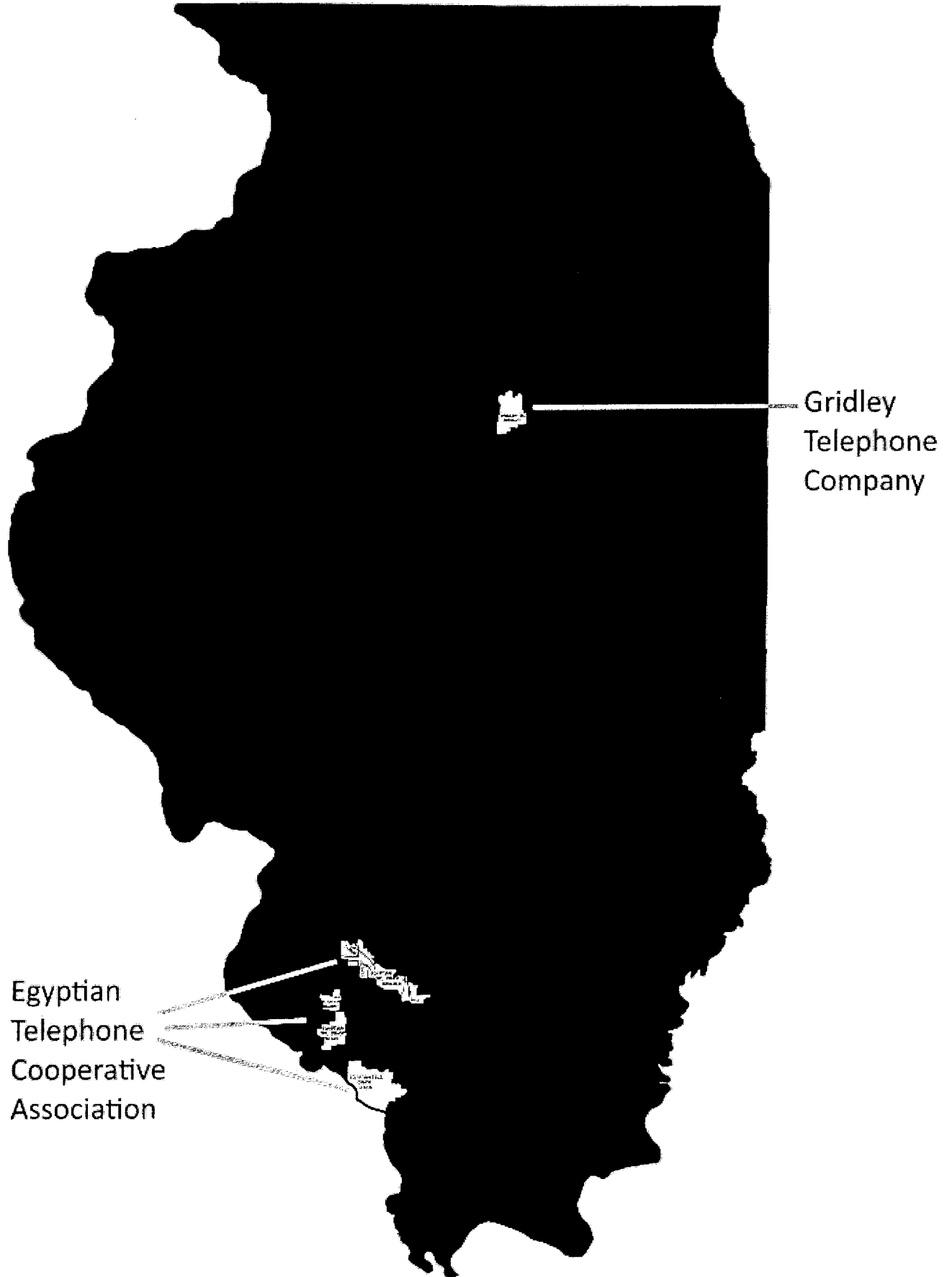
  
Thomas J. Moorman

Woods & Aitken LLP  
5151 Wisconsin Ave., N.W.  
Suite 310  
Washington, DC 20016  
(202) 944-9502

Their Counsel

Date: September 28, 2017


Attachment A





**DECLARATION**

I, Charles T. Lake, Treasurer of Mail Holdings, Inc. (the "Company") (the immediate parent company of Gridley Telephone Company and Gridley Communications, Inc.), do hereby declare under penalties of perjury that I have read the foregoing "Joint Application for Transfer of Control of Domestic and International Authorizations," and the information contained therein regarding the Company and its affiliates is true and accurate to the best of my knowledge, information, and belief.



Charles T. Lake  
Treasurer  
Mail Holdings, Inc.

Date: 9/28/17

## DECLARATION

I, Kevin J. Jacobsen, Chief Executive Officer of Egyptian Communication Services, Inc. (the "Company"), do hereby declare under penalties of perjury that I have read the foregoing "Joint Application for Transfer of Control of Domestic and International Authorizations," and the information contained therein regarding the Company and its affiliates is true and accurate to the best of my knowledge, information, and belief.

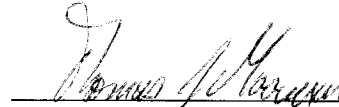


\_\_\_\_\_  
Kevin J. Jacobsen  
Chief Executive Officer  
Egyptian Communication Services, Inc.

Date: 09/20/2017

CERTIFICATE OF SERVICE

I, Thomas J. Moorman, of Woods & Aitken LLP, 5151 Wisconsin Avenue, N.W., Suite 310, Washington, DC 20016, do hereby certify that on this 28<sup>th</sup> day of September, 2017, the foregoing "Joint Application for Transfer of Control of Domestic and International Authorizations" was mailed, first class postage prepaid, to the following:

  
Thomas J. Moorman

The Honorable Bruce Rauner  
Office of the Governor  
207 State House  
Springfield, IL 62706

US Department of Defense  
Assistant Secretary for Network  
Information and Integration (NII)  
6000 Defense Pentagon  
Washington, DC 20301-6000

Department of State  
EB/CIP/SCA  
Room 4826  
2201 C Street, N.W.  
Washington, DC 20520

\*Jodie May  
Wireline Competition Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

\*David Krech and Sumita Mukhoty  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

\* via email