

ATTACHMENT 1
Notification of *Pro Forma* Transfer of Control

Pursuant to Section 63.24(f) of the Commission's Rules,¹ VIP (Holdings), Inc. (hereafter "VIP-Holdings") hereby notifies the Commission of the *pro forma* transfer of control VIP-Holdings from Graham M. Milne, as 100% owner of VIP-Holdings, to the Graham M. Milne Revocable Living Trust Dated August 11, 2011 (hereafter "Living Trust") effective August 31, 2017.

VIP-Holdings holds a 100% interest in the following entities which hold international Section 214 resale authority:

VIP Communications, Inc. (FRN 0005094974)
(a Virginia corporation)

File No. ITC-214-19961125-00600

Global Reach Communications, Inc. (FRN 0021736616)
(a Virginia corporation)

File No. ITC-214-20120504-00119

Answer to Question 10

All communications in connection with this notification should be directed to the following:

Graham M. Milne
President & CEO
VIP (Holdings), Inc.
45189 Research Place , Suite 100
Ashburn, VA 20147
Tel: (703)708-1515
Fax: (703)708-1818
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As noted above, VIP-Holdings holds 100% interests in VIP Communications, Inc. and Global Reach Communications, Inc., both of which hold international Section 214 authority. No other party to this transaction, namely VIP-Holdings, Graham M. Milne, or the Living Trust directly holds any international Section 214 authorization.

¹ 47 C.F.R. § 63.24(f)

Answer to Question 11

Applicant

Name: VIP Holdings, Inc.
Address: 45189 Research Place , Suite 100
City/State/Zip: Ashburn, VA 20147
Citizenship/State of Virginia
Incorporation:
Ownership: 100%
Principal Business: Telecommunications

Transferor

Name: Mr. Graham M. Milne
Address: 45189 Research Place , Suite 100
City/State/Zip: Ashburn, VA 20147
Citizenship: Naturalized Citizen of the United States²
Ownership: 100% (prior to transfer)
State of Incorporation: n/a
Principal Business: Telecommunications

Transferee

Name: Graham M. Milne Revocable Living Trust Dated August 11, 2011
Address: 7241 Dell Avenue
City/State/Zip: Sterling, VA 201167
Citizenship: n/a
Ownership: 100% (post transfer)
State of Incorporation: n/a
Principal Business: Revocable Trust
Trustees: Mr. Graham M. Milne
Melissa J. Milne (a US Citizen, wife of Graham M. Milne)

The parties to this transaction certify that the transfer is *pro forma* in nature and that, together with all previous *pro forma* transactions, does not result in a change of the actual controlling party of VIP-Holdings.

² Mr. Milne is a naturalized citizen of the United States and was issued a Certificate of Naturalization on May 21, 2009 under Certificate No. 32515359.