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A Professional Limited Liability Company
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November 7, 2017

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Notification of Pro Forma Transaction
UVNV, Inc. d/b/a Ultra Mobile,
Primo Connect, Inc., BA Telecom and Ka'ena Corporation

Dear Secretary Dortch:

UVNV, Inc. d/b/a Ultra Mobile ("UVNV"), Primo Connect, Inc. ("Primo"), BA Telecom, Inc. ("BA Telecom") and Ka'ena Corporation ("Ka'ena"), pursuant to Section 63.24 (F) of the Commission's Rules, hereby notifies the Commission of a series of *pro forma* transactions involving reorganization of the corporate structure of the above entities which share common ownership pre- and post- transaction.

The entities and individuals who own the licensed entities remain substantially the same throughout the reorganizations, with more than fifty-percent (50%) ownership and equity remaining with the original owners.

Transaction A: On February 5, 2016, Ka'ena Corporation ("Ka'ena" or "Transferee"), a Maine corporation, was formed as a holding company by the Common and Preferred shareholders of UVNV, which owned all of the shares of stock of Primo. Ka'ena became the holder of all of the issued and outstanding shares of stock of UVNV and UVNV contributed all of its equity in Primo to Ka'ena, making Primo a wholly-owned subsidiary of Ka'ena. (UVNV and Primo are hereinafer referred to as "Transferors").

In accordance with Section 63.24 (F) of the Commission's Rules, we provide the following information in paragraphs (A) through (H) of Section 63.18 for both the Transferor and Transferee:

(A) Transferors:

UVNV, Inc.
3195-A Red Hill
Costa Mesa, CA 92626
Phone (888) 777-0446

Primo Connect, Inc.
1550 Scenic Avenue, Suite 100
Costa Mesa, CA 92626
Phone (323) 287-6833

Transferee:

Ka'ena Corporation
Address: 1550 Scenic Avenue, Suite 100
City, State ZIP: Costa Mesa, CA 92626
Phone: (323) 287-6833

- (B) UVNV was organized under the laws of the State of Nevada.
Primo was organized under the laws of the State of Delaware.
BA Telecom was organized under the laws of the State of Nevada.
Ka'ena was organized under the laws of the State of Maine.

- (C) Correspondence concerning this notice should be sent to:

Leon Nowalsky
Nowalsky & Gothard, APLLC
1420 Veterans Blvd.
Metairie, Louisiana
Phone (504) 832-1984
Email: lnowalsky@nbglaw.com

- (D) UVNV is a Delaware corporation and holds FCC 214 International License ITC-214-20141103-00290 granted 11/21/14 to provide Global or Limited Global Resale Service.

Primo is a Delaware corporation and holds FCC 214 International License ITC-214-20160504-00148 granted 5/20/2016 to provide Global or Limited Global Resale Service.

See Pre- and Post Organizational Charts in Exhibit A.

- (H) The following individuals or entities directly (or indirectly) held ten (10%) percent or more of the voting equity interest in the Transferors:

Transferor(s)

UVNV, Inc.

David & Paige Glickman Family Trust	55.64%
United States Trust	
1550 Scenic Avenue, Suite 100	
Costa Mesa, CA 92626-1420	
United States Trust	

David Schofield, an individual Citizenship: United States 21121 Lockhaven Circle Huntington Beach, CA 92646	13.84%
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Chris Furlong, an individual Citizenship: United States 3978 46 th Street Sunnyside, NY 11104	13.8%
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Primo Connect, Inc.

UVNV, Inc. See above for UVNV Ownership	100%
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Transferee

Ka'Ena Corporation

David and Paige Glickman Family Trust United States Trust 1550 Scenic Avenue, Suite 100 Costa Mesa, CA 92626-1420	56.61%
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David Schofield, an individual 21121 Lockhaven Circle Huntington Beach, CA 92646	14.06%
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Chris Furlong, an individual 3978 46 th Street Sunnyside, NY 11104	14.03%
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Transaction B: On November 1, 2017, Primo and BA Telecom, Inc. ("BA Telecom") further reorganized resulting in BA Telecom becoming a direct subsidiary of Primo. See Pre and Post Organization Charts in Exhibit B.

All of the ultimate ownership information remained essentially the same both pre- and post-reorganization.

In accordance with Section 63.24 (F) of the Commission's Rules, we provide the following information in paragraphs (A) through (H) of Section 63.18 for both the Transferor and Transferee:

(A) Transferor:

BA Telecom, Inc.
21121 Lockhaven Circle
Huntington Beach, CA 92646
Phone (714) 271-5500

Transferee:

Primo Connect, Inc.
1550 Scenic Avenue, Suite 100
Costa Mesa, CA 92626
Phone (323) 287-6833

- (B) Primo was organized under the laws of the State of Delaware.
BA Telecom was organized under the laws of the State of Nevada.

- (C) Correspondence concerning this notice should be sent to:

Leon Nowalsky
Nowalsky & Gothard, APLLC
1420 Veterans Blvd.
Metairie, Louisiana
Phone (504) 832-1984
Email: lnowalsky@nbglaw.com

- (D) Primo is a Delaware corporation and holds FCC 214 International License ITC-214-20160504-00148 granted 5/20/2016 to provide Global or Limited Global Resale Service.

BA Telecom is a Nevada corporation and holds FCC 214 International License ITC-214-20141103-00292 granted 11/28/2014 to provide Global or Limited Global Resale Service.

- (H) The following individuals or entities directly (or indirectly) held ten (10%) percent or more of the voting equity interest in the Transferors:

Transferor

BA Telecom, Inc.

The David & Paige Glickman Family Trust	61.1%
David and Paige Glickman, Trustees	
United States Trust	
1550 Scenic Avenue, Suite 100	
Costa Mesa, CA 92626-1420	

Page -5-
November 7, 2017

David Schofield 15.04%
Citizenship: United States
21121 Lockhaven Circle
Huntington Beach, CA 92646

Chris Furlong 13.03%
Citizenship: United States
3978 46th Street
Sunnyside, NY 11104

Transferee

Primo Connect, Inc.

Ka'ena Corporation 100%
See above for Ka'ena ownership info

Should you have any additional questions please contact the undersigned.

Sincerely,

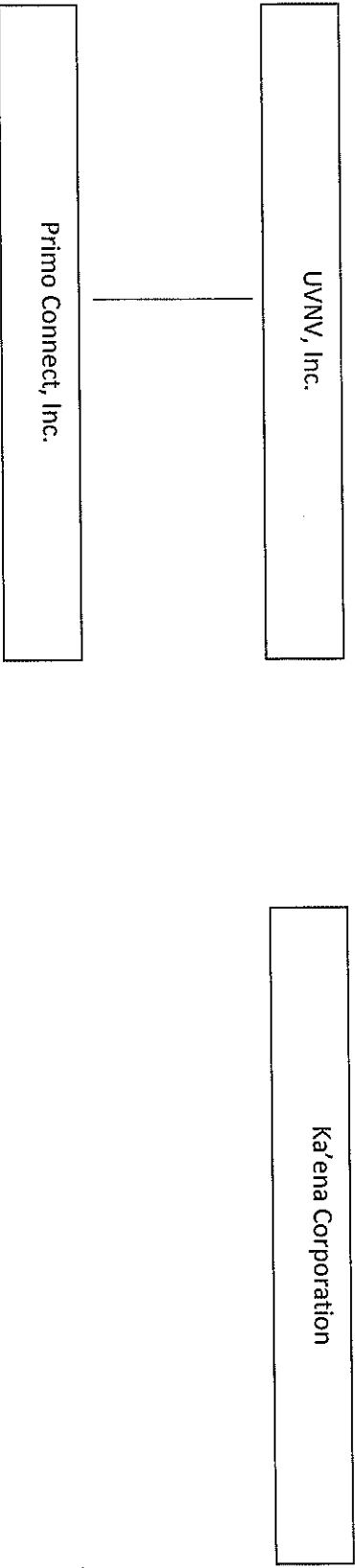


Leon Nowalsky *lln*

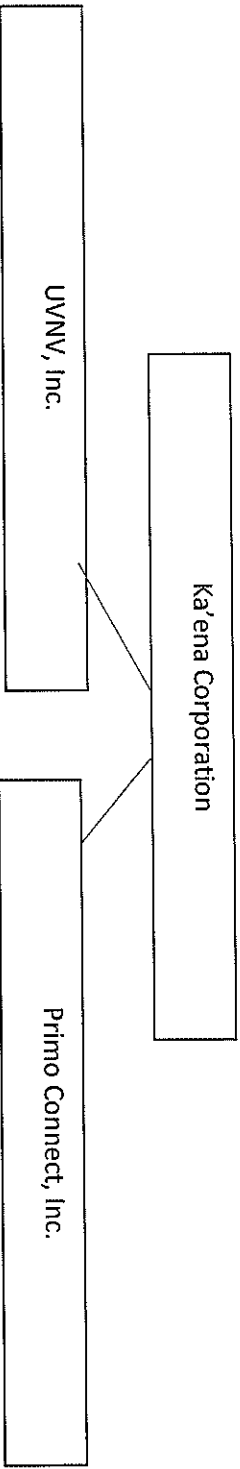
LLN/rph
Enclosure

Transaction "A"

Pre - Transaction

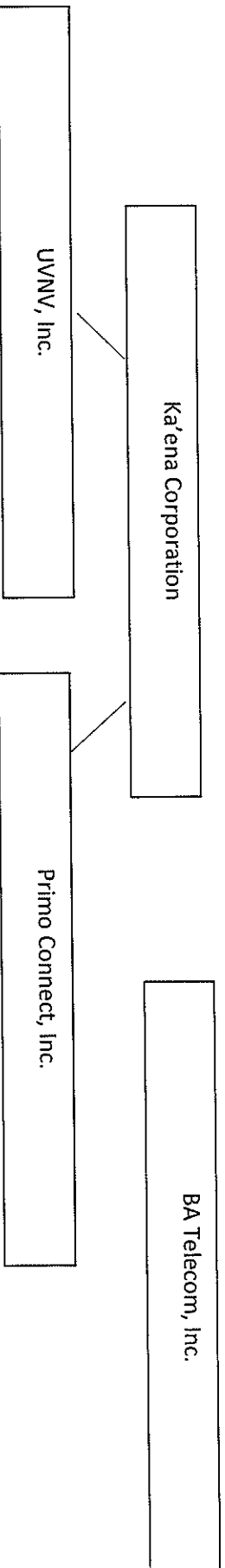


Post - Transaction



Transaction "B"

Pre - Transaction



Transaction "B"

Post - Transaction

