

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

In the Matter of)	
)	
Daniel M. Bennett,)	
Transferor,)	
)	
and)	WC Docket No . ____
)	IB File No . _____
RiverStreet Management Services, LLC,)	
Transferee,)	
)	
For Consent pursuant to Section 214)	
of the Communications Act of 1934, as amended, to)	
Transfer Control of)	
Ellerbe Telephone Company, Inc. and)	
ETCOM, LLC)	

**JOINT APPLICATION FOR TRANSFER OF CONTROL
OF DOMESTIC AND INTERNATIONAL SECTION 214 AUTHORIZATIONS**

Daniel M. Bennett ("Transferor") and RiverStreet Management Services, LLC ("RiverStreet" or "Transferee") (and jointly, "Applicants") hereby respectfully request authorization to transfer control of the Section 214 authorizations held by Transferor's wholly-owned company, Ellerbe Telephone Company, Inc. ("Ellerbe") and Ellerbe's wholly-owned subsidiary, ETCOM, LLC ("ETCOM") (together, the "Ellerbe Companies" or "Licensees") to RiverStreet. Applicants request processing of these requests pursuant to the Commission's streamlined procedures.

RiverStreet proposes to acquire all of the stock of Ellerbe, thereby acquiring control of that company and its subsidiary, ETCOM. After consummation of this transaction, the Ellerbe Companies will continue to exist and operate in their existing corporate formats and under existing corporate names, but it is anticipated that the

Ellerbe Companies will announce their intent to do business under the name "RiverStreet Communications." The Ellerbe Companies will continue to provide service pursuant to then-existing rates, terms and conditions for the near term. No carrier change charges will result from this transaction and no customer service or billing contact information will change as a result of this transaction. Furthermore, this transaction will not affect customers' preferred carrier freezes. Accordingly, this transaction will be transparent to consumers. Moreover, RiverStreet does not seek any modification in the federal regulatory status of the Ellerbe Companies, facilitating post-transaction administration and administrative efficiency.

In support of this Application, the following information is provided:

I. Transfer of Control of International Section 214 Authorization Holder

Applicant ETCOM holds an international Section 214 authorization to provide international services granted by the Commission under File No. ITC-214-19880226-00153. 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:

Transferor:

Daniel M. Bennett
254 Second Street
Ellerbe NC 28338
Phone: (910) 652-2221

FRN 0027201433

Licensees:

Ellerbe Telephone Company, Inc.
ETCOM, LLC
254 Second Street
Ellerbe NC 28338
Phone: (910) 652-2221

FRN 0004373411
FRN 0004373015

Transferee:

RiverStreet Management Services, LLC
1400 River Street
Wilkesboro NC 28697
Phone: (336) 973-6112

FRN 0024212839

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

All Applicants are organized under the laws of the State of North Carolina.

(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 (and response to Question 10, International Application):

For Transferor and the Ellerbe Companies:

Daniel M. Bennett
President
Ellerbe Telephone Company, Inc.
254 Second Street
Ellerbe NC 28338
Phone: (910) 652-2221
[Email: dbennett@ellerbetelephone.net](mailto:dbennett@ellerbetelephone.net)

With a copy to:

Thomas "Terry" Crumpler
Allman Spry Davis Leggett & Crumpler, P.A.
380 Knollwood Street, Suite 700
Winston-Salem NC 27103
Phone: (336) 722-2300
Fax: (336) 631-1429
[Email: tcrumpler@allmanspry.com](mailto:tcrumpler@allmanspry.com)

For Transferee:

Eric S. Cramer
President and CEO
RiverStreet Management Services, LLC
1400 River Street
Wilkesboro NC 28697
Phone: (336) 973-6112
[Email: ericcramer@wilkestmc.net](mailto:ericcramer@wilkestmc.net)

With a copy to:

Sylvia Lesse
Communications Advisory Counsel, LLC
5151 Wisconsin Avenue, NW, Suite 311
Washington, DC 20016
Phone: (202) 333-5273
Fax: (202) 318-3213
[Email: sylvia@independent-tel.com](mailto:sylvia@independent-tel.com)

- (4) **Statement as to whether the applicants have previously received authority under Section 214 of the Act (and response to Question 10, International Application).**

Transferor:

ETCOM holds international Section 214 authority pursuant to IB File No. ITC-21419980226-00153. The Ellerbe Companies provide interstate service by virtue of blanket domestic Section 214 authority, 47 C.F.R. § 63.01.

Transferee:

RiverStreet's parent, Wilkes Telephone Membership Corporation ("WTMC"), owns 100% of the equity interests of Wilkes Communications, Inc. ("WCI"), which holds international Section 214 authorization pursuant to IB File No. ITC-214-2011082600284. WCI is also authorized to provide interstate service by virtue of blanket domestic Section 214 authority, 47 C.F.R. § 63.01. WTMC's wholly-owned subsidiary, RiverStreet Networks, LLC, was granted authorization under Section 214 to assume control of Barnardsville Telephone Company, Saluda Mountain Telephone Company, and Service Telephone Company in 2015 (WTC Docket No. 15-5).¹

¹ On December 21, 2017, RiverStreet and Consolidated Communications Holdings, Inc. ("Consolidated") filed a Joint Application for transfer of control of the domestic and international Section 214 authorizations held by Peoples Mutual Telephone Company ("PMTTC") and Peoples Mutual Long Distance Company ("PMLDC") (together, the "Peoples Companies") from Consolidated to RiverStreet, including the International Section 214 authorization held by PMLDC (File No. ITC-214-20001207-00717) and the domestic interstate blanket authorizations held by the Peoples Companies by virtue of Section 63.01 of the Commission's Rules. *See Domestic Section 214 Application Filed for the Transfer of Control of Peoples Mutual Telephone Company and Peoples Mutual Long Distance Company to RiverStreet Management Services, LLC*, Non-Streamlined Pleading Cycle Established, WC Docket No. 17-365, DA 18-48 (Jan. 16, 2018). That application is currently pending.

- (5) **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 (and response to Question 11, International Application):**

Transferor:

Mr. Daniel M. Bennett holds one hundred percent (100%) of the outstanding shares of Ellerbe, which, in turn, owns one hundred percent (100%) of the membership interests in ETCOM. Each of the Ellerbe Companies is organized under the laws of the State of North Carolina. Mr. Bennett is a US Citizen, whose business address is 254 Second Street, Ellerbe, North Carolina 28338. Mr. Bennett's principal business, and the principal business of each of the Ellerbe Companies, is telecommunications.

Transferee:

RiverStreet, a North Carolina limited liability company, is a wholly-owned subsidiary of WTMC, a North Carolina cooperative association. WTMC is owned by its member/subscribers; no single member/subscriber owns or controls more than 5% of WTMC's equity. The address for both RiverStreet and WTMC is 1400 River Street, Wilkesboro, North Carolina 28697. The principal business of both RiverStreet and WTMC is telecommunications.

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

RiverStreet certifies that neither it nor any affiliate or successor is or will be foreign carriers, and that neither it nor any affiliate or successor is or will be affiliated with any foreign carrier.

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

RiverStreet certifies that neither it nor any affiliate or successor will provide international telecommunications to any destination country for which WTMC or an affiliate or successor (1) is a foreign carrier in that country; (2) controls a foreign carrier in that country; (3) is owned more than 25% by or controlled by an entity that controls a foreign carrier in that country.

- (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.**

RiverStreet and its affiliates and the Ellerbe Companies certify that they have not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any US international route where the foreign carrier possesses market power on the foreign end of the route and 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 (*and response to Question 20, International Application*).

This Application qualifies for streamlined processing under Sections 63.12(a) and (b) of the Commission's rules. No party is a foreign carrier or 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. 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 transaction in such a manner that would continue the current operations as a non-dominant carrier providing international services of one or more unaffiliated US carriers.

II. Transfer of Control of Domestic Section 214 Authorization

Pursuant to Section 63.04(b) of the Commission's Rules, Applicants submit the following information:

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

Please see Section I(1).

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

Please see Section I(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.

Please see Section I(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).**

Please see Section I(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.**

Please see Section I(11).

- (6) **Description of the transaction (*and response to Question 13, International Application*)**

The Applicants propose the consummation of a transaction whereby RiverStreet will purchase 100% of the shares of Ellerbe. Ellerbe will continue to exist, providing incumbent local exchange and exchange access service in rural Richmond County, North Carolina. Ellerbe's wholly-owned subsidiary, ETCOM, will maintain its separate existence, providing interexchange service to subscribers in the Ellerbe service territory, as well as CLEC voice and broadband services in neighboring areas.

North Carolina does not require prior state authorization to consummate the proposed transaction, but financing arrangements relating to the transaction are subject to review and approval by the North Carolina Utilities Commission.

Ellerbe and RiverStreet have entered into a separate transition agreement to facilitate the anticipated integration of operations, promote the efficient utilization of resources, and prepare for a seamless transition at closing of the proposed transaction. Under the agreement, the parties are planning for technical, contractual and personnel integration, and RiverStreet is providing interim employee training, all subject to the maintenance of day-to-day operational control by current Ellerbe management.

Charts depicting the pre- and post-transaction ownership structure of the Ellerbe Companies are provided as Exhibit B.

(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

Licensees:

Ellerbe's local exchange and exchange access service to Richmond County, North Carolina comprises approximately 1,100 loops in and around the Town of Ellerbe, North Carolina. In addition, high-speed Internet access is available in 99.9% of the Ellerbe service territory.

ETCOM provides domestic and international interexchange services in and around Ellerbe's incumbent service territory. In addition, ETCOM provides competitive voice and broadband services to approximately 870 loops in Anson, Montgomery, Moore, Richmond and Scotland Counties, North Carolina, all within the incumbent service territory of ILECs that are not parties to the proposed transaction. Specifically, the areas served within Anson County are within the incumbent local exchange territory of Windstream; Richmond County is served by AT&T; Montgomery County is served by CenturyLink, and Scotland County is served by AT&T and Windstream. Within its own service territory and the Ellerbe service territory, ETCOM provides domestic and international long interexchange services to a total of approximately 617 loops.

The Ellerbe Companies hold wireless licenses in the Industrial/Business Pool, Microwave Industrial/Business Pool, and 3650-3700 MHz services. Applications for transfer of control of these licenses will also be filed with the Commission.

Transferor:

The Ellerbe Companies are the only telecommunications services companies in which Mr. Bennett holds an interest.

Transferee:

Applicant RiverStreet² is a holding company with no current operations. Its parent WTMC, provides incumbent local exchange, exchange access and broadband services to approximately 8,853 subscribers in the exchanges of Boomer, Champion, Clingman, and Lomax in western North Carolina, in and around Wilkes County.³

RiverStreet owns 100% of the issued and outstanding stock of three other rural North Carolina incumbent local exchange carriers ("ILEC"): Barnardsville Telephone Company, Inc. ("Barnardsville"), Saluda Mountain Telephone Company, Inc. ("Saluda Mountain"), and Service Telephone Company, Inc. ("Service"). Barnardsville serves 614 loops in and around Barnardsville, North Carolina; Saluda Mountain serves 1,169 loops in and around Saluda Mountain, North Carolina, and Service serves 510 loops in and around Fair Bluff, North Carolina.

² Applicant RiverStreet Management Services LLC was formerly known as "RiverStreet Networks, LLC" and, under that name, purchased Barnardsville Telephone Company, Inc., Saluda Mountain Telephone Company, Inc. and Service Telephone Company, Inc. (*see Notice of Non-Streamlined Domestic 214 Application Granted*, WC Docket No. 15-5, DA 15-242 (Feb. 23, 2015)). RiverStreet Networks LLC changed its name to RiverStreet Management Services LLC in September, 2015.

³ Concurrently with this Application, WTMC is filing a Joint Application for Transfer of Control of Domestic and International Authorizations of Tri-County Telephone Membership Corporation ("TTMC") and its wholly-owned subsidiary, Tri-County Communications, Inc. ("TCI"). TTMC provides local exchange and exchange access service to approximately 2354 loops in rural communities in Beaufort, Hyde and Washington Counties, North Carolina. TCI provides interexchange services to approximately 2910 subscribers.

In addition, as described *supra* n. 1, RiverStreet is also currently an applicant for authorization to assume control of the Peoples Companies. PMTC provides local exchange and exchange access services to rural communities in Pittsylvania County, Virginia, consisting of approximately 4287 loops in and around Gretna, Virginia, with high-speed Internet access available to approximately 92% of the PMTC service territory. PMLDC provides domestic and international interexchange services in and around PMTC's incumbent service territory.

A direct, wholly owned subsidiary of RiverStreet, RiverStreet Communications of North Carolina, Inc. ("RSNC"), a North Carolina corporation, provides competitive local exchange, exchange access and broadband service to approximately 500 loops in areas outside of the Wilkes CLEC and other ILEC service areas in the region. Another direct, wholly owned subsidiary of RiverStreet, RiverStreet Communications of Virginia, Inc., a Virginia corporation, is authorized to provide competitive local exchange services in Virginia but does not currently provide such services.

WCI, a North Carolina corporation and another wholly-owned subsidiary of WTMC, provides competitive local exchange, exchange access and broadband service to approximately 2,435 subscribers in areas bordering WTMC's ILEC operations.⁴ In addition, WCI also offers long distance and video services within the ILEC and CLEC footprint of the Wilkes company affiliates (WTMC, WCI, Barnardsville, Saluda Mountain, and Service). As an interexchange carrier, WCI currently serves approximately 11,115 customers.

⁴ See map attached as Exhibit A showing Transferee (and affiliates) and Transferor (and affiliate) service areas.

WTMC holds minority interests in two wireless companies holding licenses in western North Carolina. WTMC holds 20.77% of Carolina West Wireless, Inc., which provides competitive wireless services in and around Buncombe County (where Barnardsville operates) and in Polk County (where Saluda Mountain operates), as well as areas adjacent to the Barnardsville and Saluda Mountain operating territories. WTMC also owns 19.65% of WSS, L.L.C., which holds a license with service territory adjacent to the Barnardsville service area. WTMC also owns 23.05% in Visions West, L.L.C., a company owning video distribution facilities, and also holds 18.99% of Access/On Multimedia Inc. L.L.C., a regional fiber transport network serving north-central and north-western North Carolina.

(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

Section 63.03(b)(2)(iii) affords streamlined procedures where "a proposed transaction would result in a transferee having a market share in the interstate, interexchange market of less than 10 percent, and the transferee would provide competitive telephone exchange services or exchange access services (if at all) exclusively in geographic areas served by a dominant local exchange carrier that is not a party to the transaction" and "[t]he applicants are incumbent local exchange carriers . . . that have, in combination, fewer than two (2) percent of the nation's subscriber lines installed in the aggregate nationwide, and no overlapping or adjacent service areas."⁵

Applicants, together with their affiliates, currently serve fewer than 2% of the nation's aggregate subscriber lines. The Ellerbe Companies and Transferee, along with its

⁵ 47 C.F.R. § 63.03(b)(2)(iii).

affiliates, have no overlapping or adjacent service areas, as demonstrated by the map attached as Exhibit A. Furthermore, upon consummation of the proposed transaction (and the proposed Peoples transaction), Transferee and its affiliates will continue to have a market share in the interstate, interexchange market well less than ten percent (10%). Finally, to the extent Transferee and its affiliates provide competitive telephone exchange services or competitive exchange access services, upon consummation of the transaction, they will do so exclusively in geographic areas served by a dominant local exchange carrier that is not a party to the transaction. Accordingly, streamlined treatment is warranted.

(9) Identification of all other Commission applications related to the same transaction

In addition to this combined application for the transfer of control of the Domestic and International Section 214 Authorizations held by the Ellerbe Companies, applications for the transfer of control of ETCOM's Microwave Industrial/Business Pool licenses (WQPY897, WQRE984, WQUJ329 and WRAF854), Ellerbe's Industrial/Business Pool license (WQJX749) and Ellerbe's 3650-3700 MHz license (WQKU995) will be filed with the Commission to allow consummation of this transaction.

(10) 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.

(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 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

Grant of this Application will serve the public interest, because it (1) will not result in any violation of the Communications Act of 1934, as amended (the "Act"), or any other applicable statutory provision; (2) will not result in a violation of the Commission's Rules; (3) will not substantially frustrate or impair the Commission's enforcement of the Act or interfere with the objective of the Act or other statutes; and (4) does promise to yield affirmative public interest benefits.⁶

The Application itself indicates that its grant will result in no violation of the Act, Commission Rules or other statutory provisions. Moreover, the grant will not in any way frustrate or impair the Commission's enforcement of the Act or interfere with the objectives of the Act inasmuch as RiverStreet seeks no change of the current regulatory treatment of the Ellerbe Companies.

Finally, the proposed transaction will yield affirmative public interest benefits by allowing for the continued provision of high-quality communications services to customers of the Ellerbe Companies. Transferee and its affiliates are experienced in the provision of rural telecommunications services, and will efficiently integrate management of the Ellerbe Companies into ongoing operations. Local repair and maintenance personnel will be maintained, enabling customers to enjoy a seamless transition in ownership, without disruption or interruptions in service. The transaction will not

⁶ See, e.g., *SBC Communications, Inc. and BellSouth Corp. for Consent to Transfer of Control or Assignment of Licenses and Authorizations*, Memorandum Opinion and Order, 15 FCC Rcd. 25459, 25464 (Wireline Telecommunications Bureau and International Bureau 2000).

adversely affect subscribers, competitors or the market for the provision of telecommunications services.

After consummation of the proposed transaction, the Ellerbe Companies will continue to exist and operate under the Section 214 authorizations each currently holds, and each of the Ellerbe Companies will, post-consummation, continue to provide the same services at the same rates for the near term. It is anticipated that long distance services will eventually be branded utilizing the "RiverStreet" tradename, but any change will be preceded by appropriate notice to customers. Accordingly, the proposed transaction will be wholly transparent to current customers.

Conclusion

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

Respectfully submitted,

Daniel M. Bennett
Ellerbe Telephone Company, Inc.
ETCOM, LLC

RiverStreet Management Services, LLC

By: Thomas "Terry" Crumpler
Thomas "Terry" Crumpler

By: Sylvia Lesse
Sylvia Lesse

Their Counsel

Its Counsel

Allman Spry Davis Leggett &
Crumpler, P.A.
380 Knollwood Street, Suite 700
Winston-Salem NC 27103
(336) 722-2300




















Communications Advisory Counsel, LLC
5151 Wisconsin Avenue NW, Suite 311
Washington DC 20016
(202) 333-5273

Date: March 26, 2018

EXHIBIT A

Map

MAP LEGEND

	TRI-COUNTY TELEPHONE MEMBERSHIP CORPORATION ILEC
	TRI-COUNTY COMMUNICATIONS, INC. CLEC
	TRI-COUNTY COMMUNICATIONS, INC. LONG DISTANCE COMPANY
	ELLERBE TELEPHONE COMPANY INC.
	ETCOM, LLC LONG DISTANCE COMPANY
	ETCOM, LLC
	PEOPLES MUTUAL TELEPHONE COMPANY
	PEOPLES MUTUAL LONG DISTANCE COMPANY
	WALKES TELEPHONE MEMBERSHIP CORPORATION ILEC
	WALKES COMMUNICATIONS INC. CLEC
	WALKES COMMUNICATIONS INC. LONG DISTANCE COMPANY
	RIVERSTREET COMMUNICATIONS OF INC.
	DBA: RIVERSTREET NETWORKS
	BAKERSVILLE TELEPHONE COMPANY
	DBA: RIVERSTREET NETWORKS
	SALUDA MOUNTAIN TELEPHONE COMPANY
	SERVICE TELEPHONE COMPANY
	DBA: RIVERSTREET NETWORKS
	DBA: RIVERSTREET NETWORKS

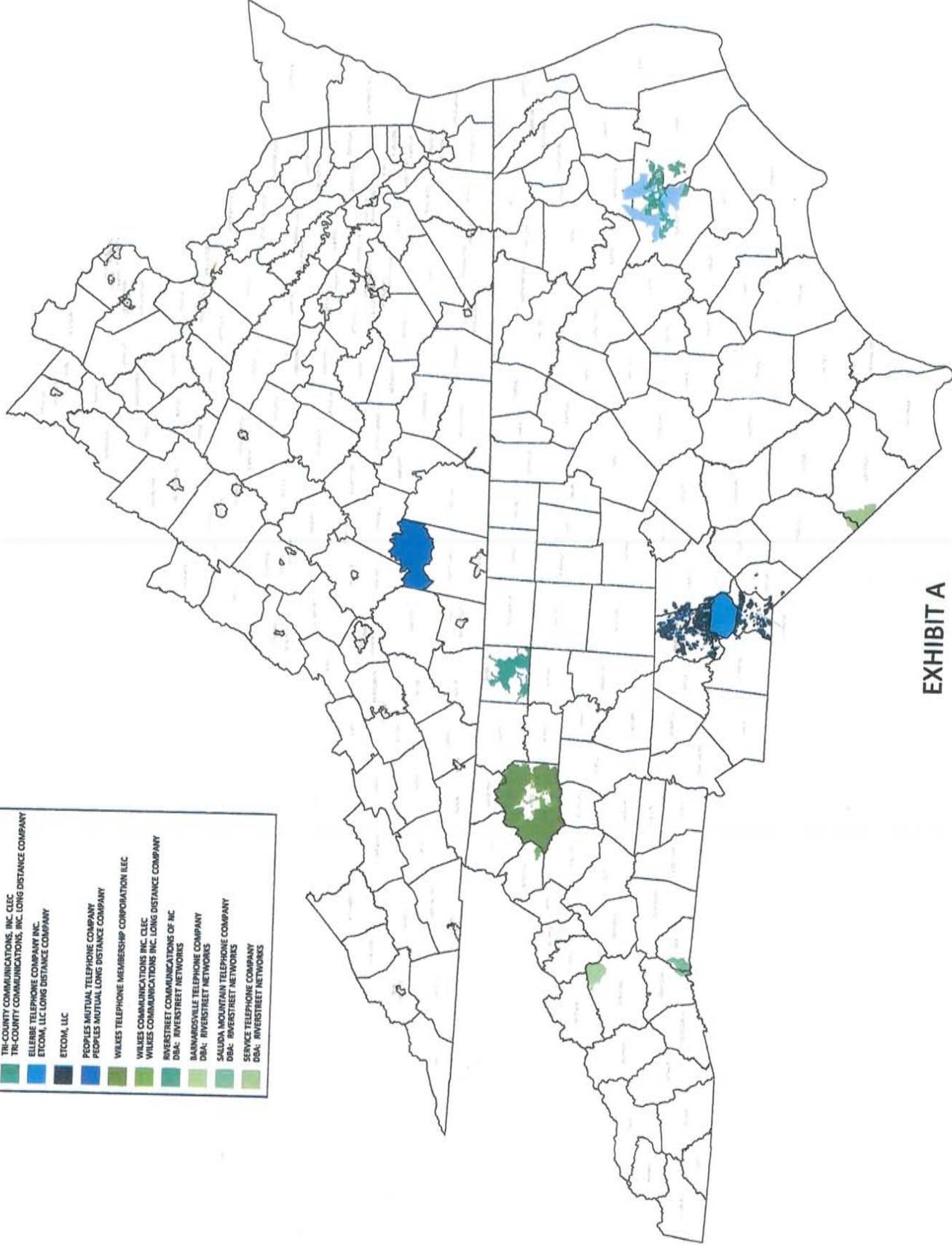
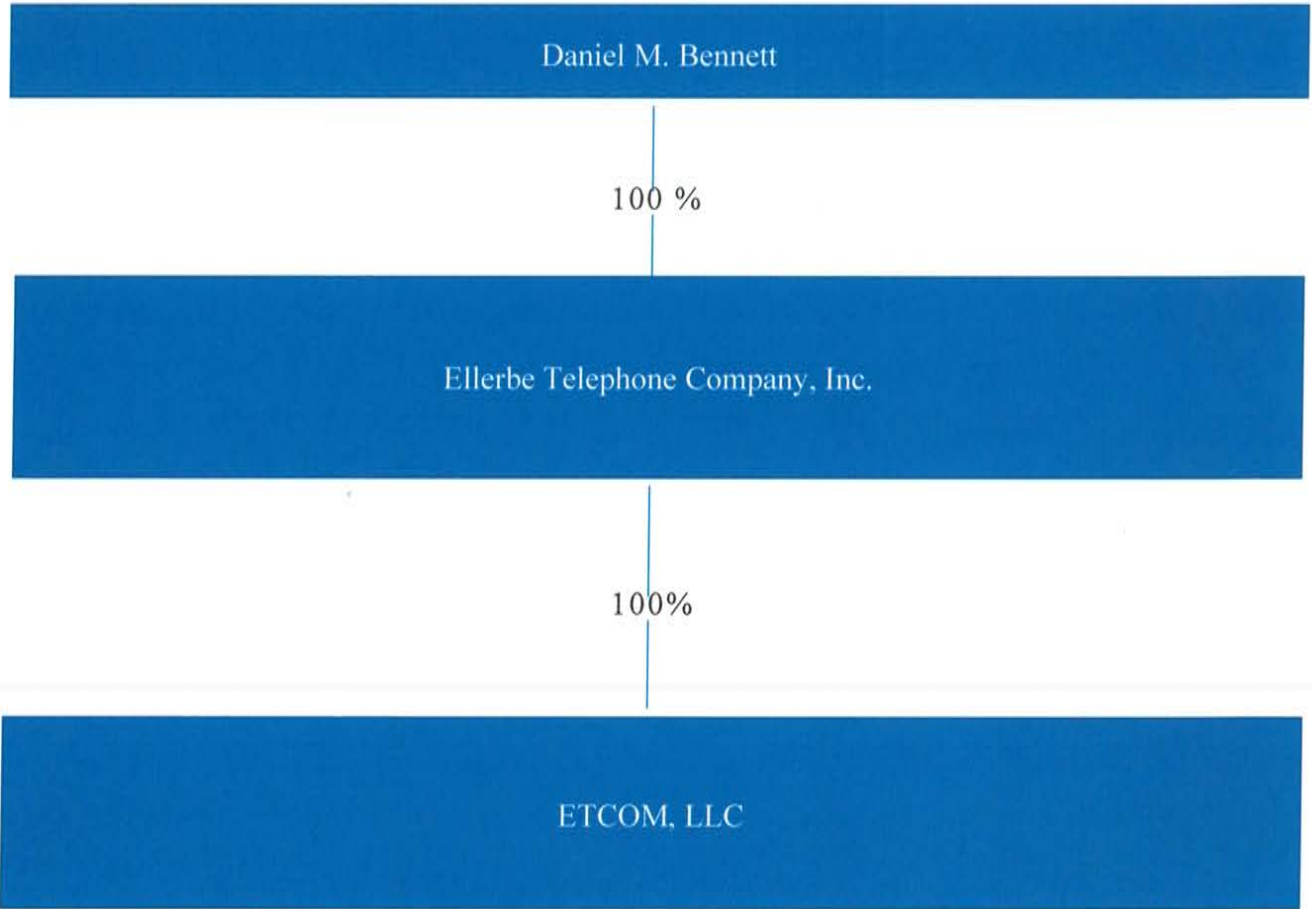


EXHIBIT A

EXHIBIT B

Pre- and Post-Transaction Ownership Structure of the Ellerbe Companies

Exhibit B-1 – Pre-Transaction Ownership



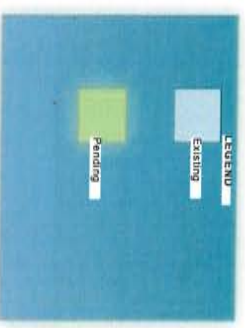
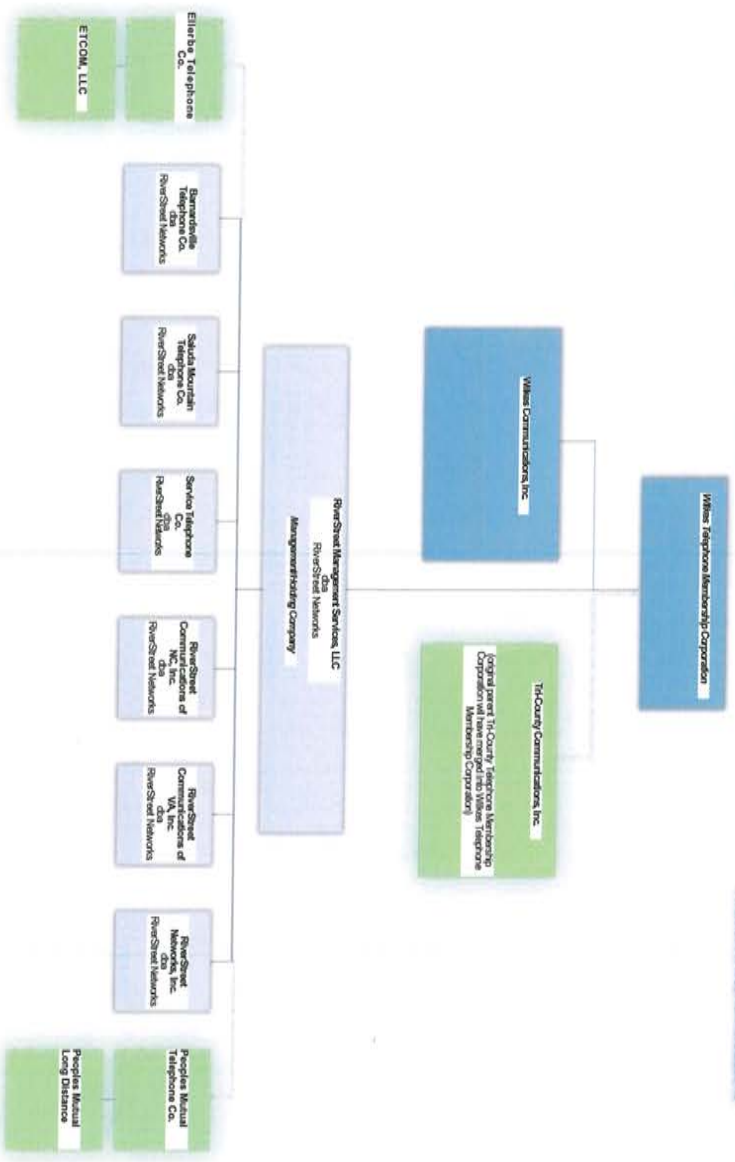


A Member of The Wilkes Companies, Inc.



A Member of The Wilkes Companies, Inc.

Exhibit B-2
Post-Transaction Ownership



DECLARATION OF DANIEL M. BENNETT

I, DANIEL M. BENNETT, President of Ellerbe Telephone Company, Inc. and ETCOM, LLC (the "Ellerbe Companies"), do hereby declare under penalty of perjury that (1) I am authorized to make this Declaration on behalf of the Ellerbe Companies; (2) the foregoing "JOINT APPLICATION FOR TRANSFER OF CONTROL OF DOMESTIC AND INTERNATIONAL SECTION 214 AUTHORIZATIONS" was prepared under my direction and supervision; and (3) the information contained therein regarding the Ellerbe Companies is true and accurate to the best of my knowledge, information, and belief.

3/23/18

Date



Daniel M. Bennett

DECLARATION OF ERIC S. CRAMER

I, ERIC S. CRAMER, Manager of RiverStreet Management Services, LLC ("RiverStreet"), do hereby declare under penalty of perjury that (1) I am authorized to make this Declaration on behalf of RiverStreet and its affiliates; (2) the foregoing "JOINT APPLICATION FOR TRANSFER OF CONTROL OF DOMESTIC AND INTERNATIONAL SECTION 214 AUTHORIZATIONS" was prepared under my direction and supervision; and (3) the information contained therein regarding RiverStreet and each of its affiliates is true and accurate to the best of my knowledge, information, and belief.

MARCH 26TH, 2012

Date

Eric S. Cramer

Eric S. Cramer

CERTIFICATE OF SERVICE

I, Sylvia Lesse, of Communications Advisory Counsel, LLC, do hereby verify that on this 26th day of March, 2018, I caused to be sent via First Class US Mail, postage prepaid, the foregoing "JOINT APPLICATION FOR TRANSFER OF CONTROL OF DOMESTIC AND INTERNATIONAL SECTION 214 AUTHORIZATIONS" to the following:

The Hon. Roy Cooper
North Carolina Office of the Governor
20301 Mail Service Center
Raleigh NC 27699-0301

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

US Department of State
EB/CIP/SCA
Room 4826
2001 C Street, NW
Washington, DC 20520

*Jodie May
*Dennis Johnson
*Tracey Wilson
*Myrva Charles
Wireline Competition Bureau
Federal Communications Commission
445 12th Street SW
Washington DC 20554

*Sumita Mukhoty
*David Krech
*Adrienne McNeil
International Bureau
Federal Communications Commission
445 12th Street SW
Washington DC 20554

* via e-mail



Sylvia Lesse