

# COMMUNICATIONS ADVISORY COUNSEL LLC

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May 8, 2018

*Via electronic filing only*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: The Shareholders of Respond Communications, Inc., Transferors  
and  
Wabash Independent Networks, Inc., Transferee  
Supplemental Filing  
WC Docket No. 18-128

Dear Ms. Dortch:

As noted in the Joint Application for Transfer of Control of Domestic and International Section 214 Authorization filed in the referenced proceeding (the "Application"), Transferors are the owners of Respond Communications, Inc., ("Respond"), which, in turn, owns one hundred percent (100%) of each of Montrose Mutual Telephone Company ("MMTC") and Montrose Mutual Long Distance, Inc. ("MMLD"). Transferee Wabash Independent Networks, Inc. ("WIN"), a wholly-owned subsidiary of Wabash Telephone Cooperative, Inc. ("WTCT") proposes to acquire all of the stock of Respond, as described more specifically in the Application.

In response to a request for clarification from Commission staff, WIN confirms that neither WIN nor WTCT, nor any of their affiliates or subsidiaries, currently provides competitive common carrier retail services to any territory that overlaps with the service territory of MMTC or MMLD. WIN has, however, (i) marketed its retail services within the MMTC/MMLD service territory, but does not currently have any customers or provide service there; and (ii) procured a special access circuit (one single dark fiber) from MMTC used to transport traffic to and from a single cell site in MMTC territory.

In addition, WIN provides the following information regarding other ownership interests in telecommunications companies, as requested by Commission staff:

WIN holds 16.67% interest in Southern Illinois Spectrum, LLC ("SIS"), the licensee of PCS spectrum under call sign WPSJ972, serving a submarket of the Paducah, Murray-Mayfield, Kentucky BTA, which does not overlap with any territory served by MMTC or MMLD. WIN also holds 5.35% of Southern Illinois Wireless, LLC, which leases all the spectrum held by SIS.

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WIN also holds 10% of Illinois Network Alliance, LLC, which provides communications support services, but no telecommunications services.

WIN holds 3.78% of Associated Network Holding, Inc. ("ANHI"), which holds a very small percentage in Inteliquent, a company that provides wholesale services to companies engaged in the provision of retail long distance services, as well as hosted VoIP services. MMLD purchases wholesale long distance services from Inteliquent.

Please refer any questions regarding this matter to the undersigned.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Sylvia Lesse", is enclosed within a light blue rectangular box.

Sylvia Lesse

cc: *(via electronic mail)*  
Gary Smith  
Gregory Kwan (WTB)  
Jodie May Donavan (WTB)  
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