

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

In the Matter of)	
)	
FLOWROUTE INC.)	
(FRN 0018176859),)	
Transferor)	
)	
and)	File No.
)	ITC-T/C-2018 _____
WEST CORPORATION,)	
Transferee)	
)	
Joint Application for Consent to Transfer)	
Control of International Authorization)	
Pursuant to Section 214 of the)	
Communications Act of 1934, As Amended)	

JOINT APPLICATION

Flowroute Inc. (“Flowroute”) and West Corporation (“West,” and collectively with Flowroute, the “Applicants”), through their undersigned counsel and pursuant to Section 214 of the Communications Act of 1934, as amended (the “Act”), 47 U.S.C. § 214, and Section 63.24 of the rules of the Federal Communications Commission (“Commission” or “FCC”), 47 C.F.R. § 63.24, hereby request approval from the Commission for the transfer control of Flowroute to West. Flowroute holds international Section 214 authority, FCC File No. ITC-214-20090123-00027. Consummation of this proposed transaction will serve the public interest by providing additional capital and managerial resources to Flowroute, which will enhance Flowroute’s ability to maintain and improve its technology and services to better compete in the telecommunications marketplace.

I. DESCRIPTION OF THE APPLICANTS

A. Flowroute

Flowroute is a privately held Nevada corporation with its principal place of business at 1218 Third Avenue, Suite 600, Seattle, Washington 98101. Flowroute is wholly owned and managed by Discrete Holdings LLC (sole member Bayan Towfiq), Sean Hsieh, Jordan Levy, and Fidelity Investments Charitable Gift Fund.¹ Flowroute operates a software-centric cloud-based network. It offers an array of non-facilities-based Internet protocol communications products to enterprise-level customers and carriers, including Voice over Internet protocol (“VoIP”) service, fax service over IP-based networks, local and toll-free voice and message-enabled telephone numbers, long-code and toll-free short message service (SMS) texting service, and multi-media messaging service (MMS).

Flowroute has one subsidiary, Flowroute CLEC Inc. (“Flowroute CLEC”), which is wholly owned and controlled by Flowroute. Flowroute CLEC also is a Nevada corporation with its principal place of business at 1218 Third Avenue, Suite 600, Seattle, Washington 98101. Flowroute CLEC is operated by the same management team as its direct parent company Flowroute.

As set forth above, Flowroute holds an international Section 214 authorization, FCC File No. ITC-214-20090123-00027. Flowroute and Flowroute CLEC, however, currently exclusively provide VoIP and related services, as well as various information services, and neither entity currently provides interstate or international telecommunications services requiring Section 214 authority. Thus, neither Flowroute nor Flowroute CLEC currently utilize Flowroute’s

¹ Flowroute’s current equity and voting interests are held as follows: Discrete Holdings LLC (sole member Bayan Towfiq), 36%; Sean Hsieh, 19.8%; Jordan Levy, 39%; and Fidelity Investments Charitable Gift Fund, 5.2%.

international Section 214 authority,² and neither Flowroute nor Flowroute CLEC holds blanket domestic Section 214 authority.³

B. West and Affiliates

West is a privately held Delaware corporation headquartered at 11808 Miracle Hills Drive, Omaha, Nebraska 68154. West is the direct or indirect parent company of several subsidiary companies, including West Telecom Services, LLC (“West Telecom”) and West IP Communications, Inc. (“WIPC”). Through its subsidiaries, West is a global provider of communications and network infrastructure services primarily to business customers throughout the United States and internationally. These services include emergency communications services, wholesale local and national tandem switching and transport services, conferencing and other meeting replacement services, alert and notification services, automated call processing, unified communications services, health advocacy, and cost recovery services. The voice and data solutions of West’s subsidiaries are deployed by customers in a variety of industries, including telecommunications, banking, retail, financial services, technology, and healthcare.

West Telecom, a wholly owned indirect subsidiary of West, is a Delaware limited liability company with a principal place of business located at 3200 W. Pleasant Run Road, Suite 300, Lancaster, Texas 75146. It is a wholly owned, direct subsidiary of West Telecom Services

² By letter dated November 3, 2017, the Commission was notified that Flowroute’s wholly owned subsidiary, Flowroute CLEC, would operate under the international Section 214 authorization of its parent company pursuant to 47 C.F.R. § 63.24(h). *See* Report No. TEL-01887, DA No. 18-51. Following consummation of the Transaction, Flowroute CLEC will continue to operate under Flowroute’s international Section 214 authorization if Flowroute CLEC provides any international telecommunications services in the future.

³ For this reason, the Applicants have not included herein responses to the information disclosure requirements set forth in 47 C.F.R. § 63.04, which apply only to applications for the transfer of control of entities holding blanket domestic Section 214 authority, and have not filed an application for transfer of control of domestic Section 214 authority.

Holdings, LLC, a Delaware limited liability company, which in turn is a wholly owned, direct subsidiary of West. West Telecom provides wholesale local and national tandem switching and transport services, termination services, toll-free origination services, and Direct Inbound Dial services to telecommunications and information service providers, including wireless carriers, wireline competitive local exchange carriers (“CLECs”) and interexchange carriers, cable telephony providers, and VoIP providers. West Telecom owns and operates its own network equipment but leases transmission lines (including access circuits) from other carriers. West Telecom’s services are currently available in 47 states⁴ and the District of Columbia. West Telecom holds blanket domestic Section 214 authority, as well as international Section 214 authority, FCC File No. ITC-214-20050203-00058, to operate as a global or limited global facilities-based and resale carrier.

WIPC is a Delaware corporation, and its principal place of business is located at 401 S. 4th Street, Louisville, Kentucky 40202. WIPC primarily provides interconnected VoIP services to business customers in all 50 states plus the District of Columbia. WIPC holds international Section 214 authority, FCC File No. ITC-214-20110309-00066, to operate as a global or limited global facilities-based and resale carrier.

West is a wholly owned subsidiary of Olympus Holdings II, LLC (“Olympus”), a Delaware limited liability company with a principal place of business located at 9 West 57th Street, 43rd Floor, New York, New York 10019. Olympus is a holding company and is

⁴ Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Vermont, Virginia, Washington, West Virginia, Wisconsin, and Wyoming.

ultimately controlled by a principal of Apollo Global Management, LLC (“Apollo”), Joshua J. Harris, who is a U.S. citizen. The equity of Olympus is ultimately owned by certain investment funds set forth in Exhibit A that are managed by affiliates of Apollo. Apollo, which was founded in 1990, is a leading global alternative investment manager. Apollo raises, invests, and manages funds on behalf of some of the world’s most prominent pension and endowment funds as well as other institutional and individual investors. Neither Olympus nor Apollo holds a ten percent or greater direct or indirect equity interest in any U.S. domestic telecommunications provider.

West is well-qualified managerially, technically and financially to own and control Flowroute. Through its subsidiaries, West is an experienced telecommunications provider. In addition, as an indirect subsidiary of West, Flowroute will have access to the financial, operational, and managerial resources of West, Olympus, and Apollo.

II. DESCRIPTION OF THE TRANSACTION

On June 28, 2018, Flowroute, Discrete Holdings LLC, Sean Hsieh, Jordan Levy, and Fidelity Investments Charitable Gift Fund (collectively, “Sellers”), Bayan Towfiq (as Sellers’ representative), and West entered into a Stock Purchase Agreement pursuant to which West will purchase all of the issued and outstanding shares of capital stock of Flowroute (the “Transaction”). The completion of the Transaction is conditioned on, among other things, obtaining required federal and state regulatory approvals. The Sellers and Buyer intend to consummate the Transaction as promptly as practicable after such approvals have been received and other closing conditions are satisfied or waived.

As a result of the Transaction, Flowroute will become a wholly owned, indirect subsidiary of West, and Flowroute CLEC will remain a wholly owned direct subsidiary of Flowroute. In addition, AP VIII Olympus VoteCo, LLC (“VoteCo”), which is controlled by Mr.

Harris and which indirectly controls all of the voting interests in West, will indirectly control all of the voting interest in Flowroute. No other individual or entity will hold any voting interest in Flowroute. Further, no individual or entity will directly or indirectly hold ten percent or more of the equity of Flowroute other than the Apollo investment funds and Olympus holding companies set forth in Exhibit A, which includes pre- and post-Transaction organization diagrams illustrating the current and proposed post-Transaction corporate structure of Flowroute and Flowroute CLEC. The proposed post-Transaction ownership structure was approved by the Commission in June 2017 as qualified to control international Section 214 authorizations when the Commission consented to the acquisition of West by Olympus.⁵

III. PUBLIC INTEREST STATEMENT

The Transaction will serve the public interest by providing additional capital and managerial resources to Flowroute, which will, in turn, enhance Flowroute's ability to maintain and improve its network and services and to better compete in the telecommunications marketplace. The Transaction will only result in a change in the ownership of Flowroute. No assignment of licenses, assets or customers will occur as a consequence of the proposed Transaction. Following consummation of the Transaction, the Parties anticipate that Flowroute will continue to provide service to their existing customers under the same rates, terms, and conditions that they currently offer. Accordingly, the Transaction will be, for all practical purposes, transparent to the customers of Flowroute.

As a result of the Transaction, Flowroute will be able to draw upon the decades of managerial and communications experience of West, which is substantially larger than

⁵ *International Authorizations Granted, Section 214 Applications (47 C.F.R. § 63.18)*, Public Notice, 32 FCC Rcd 5490 (IB 2017) (consenting to the transfer of control of the international Section 214 authorization of West Telecom to Olympus Holdings II, LLC).

Flowroute and serves a much broader customer base, as well as West's management team. However, the Parties anticipate that the operational and customer-facing teams of Flowroute will remain in place following completion of the Transaction and continue to manage the day-to-day operations and business of Flowroute. Thus, Flowroute will continue to be operated by highly experienced, well-qualified personnel but will have a deeper bench of West resources to draw on following the consummation. Lastly, the proposed Transaction will not adversely affect competition in the market for communications services. The types of businesses and carriers that comprise Flowroute's customer base currently have a plethora of national, regional, and local communications service providers competing for their service, and they will continue to do so after the Transaction closes.

IV. INFORMATION REQUIRED BY 47 C.F.R. §§ 63.18 AND THE IBFS SECTION 214 MAIN FORM

In support of their request for consent to transfer control to West of Flowroute, which hold international Section 214 authority, the Applicants submit the following information, pursuant to 47 C.F.R. § 63.18 and the IBFS Section 214 Main Form:

A. Contact Information (47 C.F.R. § 63.18(c), (d), Answer to IBFS Main Form Question 10)

Correspondence concerning the Transaction should be directed to:

For Transferor:

Cheng-yi Liu
Fletcher, Heald & Hildreth, PLC
1300 North 17th Street, 11th Floor
Arlington, VA 22209
Tel: (703) 812-0400
Fax: (703) 812-0486
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with a copy to:

Danielle Porter
Chief Financial Officer
Flowroute Inc.
1218 Third Avenue, Suite 600
Seattle, Washington 98101
Tel: (206) 641-8000
Fax: (206) 641-8190
Dporter@Flowroute.com

For Transferee:

with a copy to:

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Wilkinson Barker Knauer, LLP
1800 M. Street, N.W., Suite 800N
Washington, DC 20036
Tel: (202) 783-4141
Fax: (202) 783-5851
PMarchesiello@wbklaw.com

Sean Ward
Associate Counsel
West Corporation
1601 Dry Creek Dr.
Longmont, CO 80503
Tel: (720) 864-5510
Fax: (720) 494-6600
sward@west.com

Flowroute holds international Section 214 authority, granted in FCC File No. ITC-214-20090123-00027, to operate as a global or limited global facilities-based and resale carrier.⁶ West Telecom holds international Section 214 authority, granted in FCC File No. ITC-214-20050203-00058, to operate as a global or limited global facilities-based and resale carrier. WIPC holds international Section 214 authority, granted in FCC File No. ITC-214-20110309-00066, to operate as a global or limited global facilities-based and resale carrier. Neither West nor any of its subsidiaries other than WIPC and West Telecom hold any other domestic or international Section 214 authority. No entity with a ten percent or greater direct or indirect voting or equity interest in West holds a ten percent or greater equity or voting interest in any other international Section 214 authorization.

B. Post-Consummation Ownership (47 C.F.R. § 63.18(h), Answer to IBFS Main Form Question 11)

Upon consummation of the Transaction, the following entities will hold a ten percent or greater direct or indirect voting or equity interest in Flowroute:

⁶ The Commission's grant of authority was to Flowroute LLC. By letter dated August 6, 2014, the Commission was notified that Flowroute LLC changed its name to Flowroute Inc. effective August 1, 2014. The Commission accepted this informational change in Report No. TEL-01689, DA No. 14-1278, dated September 4, 2014.

The following entity will directly own 100 percent of Flowroute:

Name: West Telecom Services, LLC
Address: 3200 W. Pleasant Run Road, Suite 300
Lancaster, Texas 75146
Citizenship: Delaware, U.S.
Interest: 100% voting and equity
Principal Business: Telecommunications services provider

The following entity will directly own 100 percent of West Telecom:

Name: West Telecom Services Holdings, LLC
Address: 3200 W. Pleasant Run Road, Suite 300
Lancaster, Texas 75146
Citizenship: Delaware, U.S.
Interest: 100% voting and equity
Principal Business: Sole member and manager of West Telecom Services, LLC

The following entity will directly own 100 percent of West Telecom Services Holdings, LLC:

Name: West Corporation
Address: 11808 Miracle Hills Drive
Omaha, Nebraska 68154
Citizenship: Delaware, U.S.
Interest: 100% voting and equity
Principal Business: Telecommunications service provider management company

The following entity will directly own West:

Name: Olympus Holdings II, LLC
Address: 9 West 57th Street, 43rd Floor
New York, New York 10019
Citizenship: Delaware, U.S.
Interest: 100% voting and equity
Principal Business: Sole West Telecom Services, LLC stockholder

The following entity will directly own Olympus:

Name: Olympus Holdings I, LLC
Address: 9 West 57th Street, 43rd Floor
New York, New York 10019
Citizenship: Delaware, U.S.
Interest: 100% voting and equity
Principal Business: Sole member and manager of Olympus Holdings II, LLC

The following entity will directly own Olympus Holdings I, LLC:

Name: Mount Olympus Holdings, Inc.
Address: 9 West 57th Street, 43rd Floor
New York, New York 10019
Citizenship: Delaware, U.S.
Interest: 100% voting and equity
Principal Business: Sole member and manager of Olympus Holdings I, LLC

The following entities will hold a ten percent or greater direct voting or equity interest in Mount Olympus Holdings, Inc.:

Name: Mount Olympus Parent, L.P.
Address: 9 West 57th Street, 43rd Floor
New York, New York 10019
Citizenship: Delaware, U.S.
Interest: 100% equity (non-voting)
Principal Business: Sole Class B non-voting shareholder of Mount Olympus Holdings, Inc.

Name: AP VIII Olympus VoteCo, LLC
Address: 9 West 57th Street, 43rd Floor
New York, New York 10019
Citizenship: Delaware, U.S.
Interest: 100% voting (no equity)
Principal Business: Sole Class A voting shareholder of Mount Olympus Holdings, Inc.

The following entities will hold a ten percent or greater direct voting or equity interest in VoteCo:⁷

Name: Joshua J. Harris
Address: 9 West 57th Street, 43rd Floor
New York, New York 10019
Citizenship: U.S.
Interest: 51% voting and 33.3% equity as a member⁸
Principal Business: Investment Management

Name: Matthew Nord

⁷ Although these individuals hold an equity interest in VoteCo, VoteCo does not hold a direct or indirect equity interest in Mount Olympus Holdings, Inc.; Olympus Holdings I, LLC; Olympus; West; West Telecom Services Holdings, LLC; West Telecom; or Flowroute.

⁸ VoteCo is managed by a two-person board of managers, appointed by Joshua Harris. VoteCo's two managers are Matthew Nord and Robert Kalsow-Ramos, who are also VoteCo officers.

Address: 9 West 57th Street, 43rd Floor
New York, New York 10019
Citizenship: U.S.
Interest: 24.5% voting and 33.3% equity as a manager and member
Principal Business: Investment Management

Name: Robert Kalsow-Ramos
Address: 9 West 57th Street, 43rd Floor
New York, New York 10019
Citizenship: U.S.
Interest: 24.5% voting and 33.3% equity as a manager and member
Principal Business: Investment Management

The following entities will hold a ten percent or greater direct equity interest in Mount Olympus Parent, L.P.:

Name AP VIII Olympus Holdings, L.P.
Address: 9 West 57th Street, 43rd Floor
New York, New York 10019
Citizenship: Delaware, U.S.
Interest: 73% equity⁹
Principal Business: Limited partner in Mount Olympus Parent, L.P.

Name AP Olympus Co-Invest, L.P.
Address: 9 West 57th Street, 43rd Floor
New York, New York 10019
Citizenship: Delaware, U.S.
Interest: greater than 10% but less than 27% equity¹⁰
Principal Business: Limited partner in Mount Olympus Parent, L.P.

⁹ The equity interest in Mount Olympus Parent, L.P. that is not held by AP VIII Olympus Holdings, L.P. is held by co-investors (through AP Olympus Co-Invest, L.P.) and members of the West management team.

¹⁰ AP Olympus Co-Invest, L.P. and members of the West management team collectively hold a 27 percent equity interest in Mount Olympus Parent, L.P. Although AP Olympus Co-Invest, L.P. holds an interest in Mount Olympus Parent, L.P. that is greater than ten percent but less than 27 percent, no general or limited partner of AP Olympus Co-Invest, L.P. and no member of West's management team, individually or in combination with any investment such person or entity also may have in the Apollo Funds (as defined below), or AP VIII Olympus Holdings, L.P., holds a 10 percent or greater aggregate direct or indirect equity interest in Mount Olympus Holdings, Inc.; Olympus Holdings I, LLC; Olympus; West; West Telecom Services Holdings, LLC; West Telecom; or Flowroute.

The following entities will hold a ten percent or greater direct equity interest in AP VIII Olympus Holdings, L.P:¹¹

Name: Apollo Investment Fund VIII, L.P.
Address: 9 West 57th Street, 43rd Floor
New York, New York 10019
Citizenship: Delaware, U.S.
Interest: 47.9% equity
Principal Business: Investment in AP VIII Olympus Holdings, L.P.

Name: AOP VIII (AIV), L.P.
Address: 9 West 57th Street, 43rd Floor
York, New York 10019
Citizenship: Delaware, U.S.
Interest: 14.7% equity
Principal Business: Investment in AP VIII Olympus Holdings, L.P.

Name: Apollo Overseas Partners (Delaware 892) VIII, L.P.
Address: 9 West 57th Street, 43rd Floor
New York, New York 10019
Citizenship: Delaware, U.S.
Interest: 30.1% equity
Principal Business: Investment in AP VIII Olympus Holdings, L.P.

Diagrams depicting the proposed Flowroute pre- and post-closing corporate structure are provided as Exhibit A hereto. Other than as set forth above, following consummation of the Transaction, no other entity or individual will hold a ten percent or greater aggregate direct or indirect equity or voting interest in Flowroute.

C. Foreign Carrier Interlocking Directorates (47 C.F.R. § 63.18(h), Answer to IBFS Main Form Question 12)

Flowroute has no interlocking directorates with a foreign carrier. West and West Telecom have the following interlocking directorates, which will continue following consummation of the

¹¹ No limited partner in Apollo Investment Fund VIII, L.P.; AOP VIII (AIV), L.P.; or Apollo Overseas Partners (Delaware 892) VIII, L.P. (collectively, “Apollo Funds”) holds a direct or indirect aggregate ten percent or greater limited partnership interest in the foregoing entities or will hold a direct or indirect aggregate ten percent or greater equity or voting interest in AP VIII Olympus Holdings, L.P.; Mount Olympus Holdings, Inc.; Olympus Holdings I, LLC; Olympus; West; West Telecom Services Holdings, LLC; West Telecom; or Flowroute.

Transaction:

- Robert Wechsler is President for West, Executive Vice President for West Telecom, Executive Vice President and Director for WIPC and West UC Limited, Senior Vice President and Director for West Unified Communications Services Canada, Inc., and Director for West Canada Holdings ULC, West UC Singapore Private Limited, West UC Japan K.K. and West Cloud Contact Solutions Limited; and
- Nancy Disman is Chief Administrative Officer for West and West Telecom, Chief Administrative Officer and Director for WIPC, West Unified Communications Services Canada, Inc. and West UC Limited, and Director for West Canada Holdings ULC, West UC Singapore Private Limited, West UC Japan K.K. and West Cloud Contact Solutions Limited.

D. Narrative of Transfer of Control and Public Interest Statement (47 C.F.R. § 63.24(e), Answer to Main IBFS Form Question 13)

The Applicants describe the Transaction and its public interest benefits in Sections II and III of this Application above.

E. Foreign Carrier Affiliates (47 C.F.R. § 63.18(i), Answer to IBFS Main Form Question 14)

West Telecom is a foreign carrier by virtue of its Basic International Telecommunications Services (BITS) license to operate in Canada. In addition, West and West Telecom are affiliated with the following foreign carriers:

Affiliate Name	Country
West Unified Communications Services Canada, Inc.	Canada (World Trade Organization (“WTO”) Member)
West Canada Holdings ULC	Canada (WTO Member)
West UC Limited	Belgium, Denmark, Finland, France, Ireland, Luxembourg, Netherlands, Spain, Sweden, U.K. (WTO Members)
West UC Japan K.K.	Japan (WTO Member)
West UC Singapore Private Limited	Singapore (WTO Member)
West Cloud Contact Solutions Limited	Ireland, U.K. (WTO Members)

Flowroute will become affiliated with the above identified foreign carriers upon consummation of the Transaction. Flowroute currently is not affiliated with any foreign carrier.

F. Certifications Regarding Destination Markets (47 C.F.R. § 63.18(j), Answer to IBFS Main Form Question 15)

Flowroute currently is neither a foreign carrier, affiliated with a foreign carrier, nor controls a foreign carrier, in any country. Upon consummation of the Transaction, however, Flowroute will be authorized to provide service to certain destination countries where an entity that owns more than 25 percent of, or that controls, Flowroute also controls a foreign carrier in such countries. Specifically, Flowroute will be authorized to provide service to each of the destination countries listed in Section IV.E. that are, in turn, served by entities controlled by West.¹² Upon consummation of the Transaction, Flowroute will not be authorized to provide service to any destination country where (i) Flowroute is a foreign carrier; (ii) Flowroute controls a foreign carrier; or (iii) two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of Flowroute and are parties to, or the beneficiaries of, a contractual relation (*e.g.*, a joint venture or market alliance) affecting the provision or marketing of international basic telecommunications services in the United States.¹³

G. Non-Dominant Status (47 C.F.R. § 63.18(m), Answer to IBFS Main Form Question 16)

The Applicants qualify for non-dominant status under Section 63.10 of the Commission's rules on each U.S.-destination route listed in Section IV.E. above where they would be a foreign carrier or affiliated with a foreign carrier. Specifically, none of the foreign carrier affiliates listed above has a market share of 50 percent or more in the respective international transport or local access markets in any of the identified jurisdictions, all of which are WTO member countries. Moreover, none of the identified foreign carriers appears on the Commission's list of foreign

¹² See 47 C.F.R. § 63.18(j)(3).

¹³ See 47 C.F.R. § 63.18(j)(1)-(2) & (4).

carriers presumed to have market power in a foreign telecommunications market. No other entity identified in this Application as holding a disclosable interest in West, its operating subsidiaries, or Flowroute provides telecommunications services.

H. Eligibility for Streamlined Processing (47 C.F.R. §§ 63.12, 63.18(p), Answer to IBFS Main Form Question 20)

As explained in Section IV.G. above, West, West's operating subsidiaries holding international Section 214 authority (*i.e.*, West Telecom and WIPC), and Flowroute, all qualify for a presumption of non-dominance under Section 63.10(a)(3) of the Commission's rules.¹⁴ In addition, Applicants do not have an affiliation with any dominant U.S. carrier.¹⁵ Also, following the consummation of this Transaction, Flowroute will have the identical ultimate controlling ownership as West Telecom, and West Telecom, as a holder of international Section 214 authority, FCC File No. ITC-214-20050203-00058, was authorized by the Commission in June 2017 to provide services on the affiliated destination routes listed in Section IV.F. of this Application.¹⁶ Further, the Applicants agree to be subject to all of the conditions to which West Telecom is subject for its provision of service on those routes. (No such conditions were imposed by the Commission.) Accordingly, pursuant to 47 C.F.R. § 63.12(c)(1)(ii) & (vi), 47 C.F.R. § 63.12(c)(2), and 47 C.F.R. § 63.18(p), the Applicants request streamlined processing of this Application and the Application qualifies for such streamlined processing.

¹⁴ See 47 C.F.R. § 63.12(c)(1)(ii) (applicant affiliated with foreign carriers qualifies for streamlined processing where "applicant qualifies for a presumption of non-dominance under §63.10(a)(3)")

¹⁵ See 47 C.F.R. § 63.12(c)(2).

¹⁶ See Application at 6 n. 5.

V. CONCLUSION

For the reasons stated above, Applicants respectfully submit that the public interest, convenience, and necessity would be furthered by a streamlined grant of this Application for the above-described transaction.

Respectfully submitted,

FLOWROUTE INC.

/s/ Cheng-yi Liu

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WEST CORPORATION

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Counsel for West Corporation

Dated: June 29, 2018

Exhibit A: Pre-Closing Flowroute Inc.

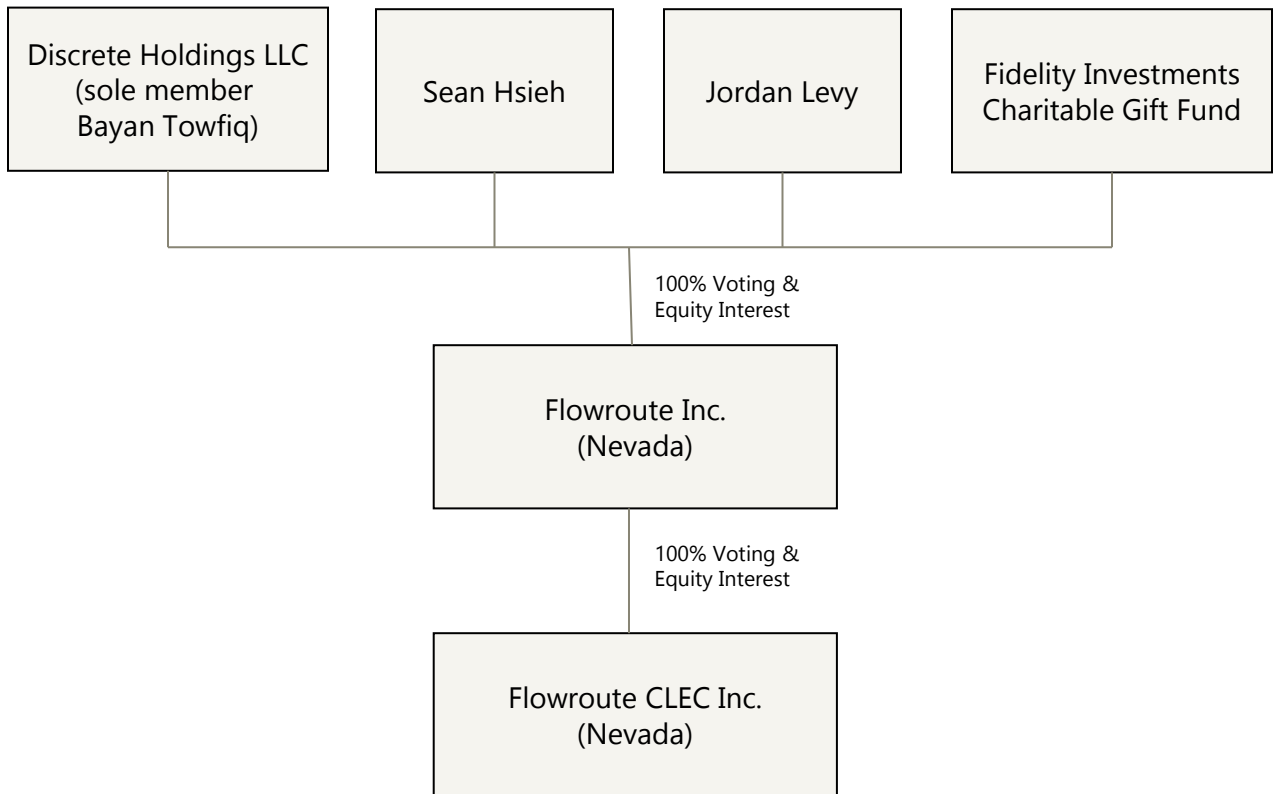


Exhibit A: Post-Closing Flowroute Inc.

