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FILED VIA IBFS

International Bureau
Federal Communications Commission
Washington, DC 20554

Re: Illinois Valley Cellular RSA 2-I Partnership
File No. ITC-T/C-20180829-00168

Dear Sir/Madam:

Illinois Valley Cellular RSA 2-I Partnership (“IVC RSA 2-I”) hereby files, by counsel, a Revised Narrative Statement to the above-referenced application. The Revised Narrative Statement deletes all references to *nunc pro tunc* approval.

Please do not hesitate to contact the undersigned if you have any questions.

Sincerely,

Robert S. Koppel
Counsel to IVC RSA 2-I

Attachment

**REVISED DESCRIPTION OF TRANSACTION
AND PUBLIC INTEREST STATEMENT**

In this application, Illinois Valley Cellular RSA 2-I Partnership (“IVC RSA 2-I”) seeks consent from the Commission to transfer control of the Section 214 authorization for global resale, File No. ITC-214-20010507-00291 of IVC RSA 2-I (with no single owner holding more than a 40% interest) to MTCO Corporation (“MTCO”).

Prior to January 1, 2017, the ownership of IVC RSA 2-I consisted of the following: (1) Tonica Cellular, Inc. (“Tonica”) held an 11.11 percent general partnership interest in IVC RSA 2-I; (2) Leonore Cellular, Inc. (“Leonore”) held a 14.51 percent general partnership interest in IVC RSA 2-I; (3) Cencomm, Inc. (“Cencomm”) held a 37.19 percent general partnership interest in IVC RSA 2-I; and (4) Marseilles Cellular, Inc. (“Marseilles”), which is 100% owned by MTCO, held a 37.19 percent general partnership interest in IVC RSA 2-I.

On January 1, 2017, the general partnership interests held by Leonore (14.51 percent) and Cencomm (37.19 percent) were distributed to Marseilles and Tonica. As a result, MTCO’s indirect general partnership interest in IVC RSA 2-I increased from 37.19 percent to 77 percent and Tonica’s general partnership interest in IVC RSA 2-II increased from 11.11 percent to 23 percent.

The Parties respectfully submit that Commission approval of the transfer of control will serve the public interest, convenience, and necessity. IVC RSA 2-I is a longstanding FCC licensee, operating state of the art digital wireless networks in eight counties running from the Indiana State line to south of Chicago, to near Peoria, Illinois and then on towards the Iowa state line. Unlike other wireless providers, it has concentrated on building towers that serve the needs of the local communities and the rural farming community. IVC RSA 2-I holds several licenses in good standing and provides commercial mobile wireless service in furtherance of the public interest. Finally, the transaction that triggered the transfer of control did not impact the operations of IVC RSA 2-I, including its customers, as there was no change in the operations of the partnership.

The Commission has determined that applications that demonstrate on their face that a transaction will yield affirmative competitive public interest benefits and will neither violate the Act or Commission rules, nor frustrate or undermine policies and enforcement of the Act by reducing competition or otherwise, do not require extensive review or expenditure of considerable resources by the Commission. This transaction meets this standard and should thus be granted promptly.

By separate application, Special Temporary Authority (“STA”) is requested to allow for continued operation and continued service to customers by IVC RSA 2-I while this application is considered by the International Bureau.

ANSWER TO QUESTION 10

Information for Transferor, Section 214 Holder, and Transferee

Section 214 Holder & Transferor: IVC RSA 2-I

Contact point:
Glenn Rauh
Illinois Valley Cellular
200 Riverfront Drive
Marseilles, IL 61341
815-795-3200

Transferee: MTCO Corporation

Contact point:
Ann E. Dickerson
MTCO Corporation
220 N. Menard Street
Metamora, IL 61548
309-366-6120

Regulatory Counsel to Section 214 holder, Transferor and Transferee

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ANSWER TO QUESTION 11

Direct and Indirect Ownership of Transferee

Rauh Enterprises, L.P. directly owns 36.53 percent of MTCO Corporation. Its business address is 220 North Menard Street, Metamora, IL 61548. It is organized in the United States, and its principal business is investments.

Allen J. Rauh directly owns 16.72 percent of MTCO Corporation. His business address is 220 North Menard Street, Metamora, IL 61548. He is a United States citizen.

Kathleen A. Rauh directly owns 14.72 percent of MTCO Corporation. Her business address is 220 North Menard Street, Metamora, IL 61548. She is a United States citizen.

The GR/SR Irrevocable Trust owns 93.69% of Rauh Enterprises, L.P., which owns 36.53 percent of MTCO Corporation. Its business address is PO Box 135, Metamora, IL 61548. It is organized in the United States, and its principal business is investments.

Ann Dickerson is the Trustee of the GR/SR Irrevocable Trust, which owns 93.69% of Rauh Enterprises, L.P., which owns 36.53 percent of MTCO Corporation. Her business address is c/o GR/SR Irrevocable Trust, PO Box 135, Metamora, IL 61548. She is a United States citizen.

No other individual or entity holds a 10 percent or greater direct or indirect interest in MTCO Corporation.

ANSWER TO QUESTION 13

Narrative Statement Regarding the Transaction

Please see “Description of Application and Public Interest Statement” above.

ANSWER TO QUESTION 20

Streamlined Processing

The application qualifies for streamlined processing because none of the parties hereto is affiliated with any foreign carrier nor is any party affiliated with any dominant U.S. carrier whose international switched or private line service is being resold. Further, the Transferee has no identifiable foreign ownership.