

ITC-T/C-20181120-00218  
ITC-T/C-20181120-00217  
ITC-T/C-20181120-00216  
ITC-T/C-20181120-00215  
ITC-T/C-20181120-00214

NOV 29 2018

International Bureau

work Long Distance, Inc., et al.

**Request for Special Temporary Authority  
Attachment 1**

Re: ITC-T/C-20181120-00221

ITC-T/C-20181120-00220

ITC-T/C-20181120-00219

**Response to Question 10:**

The following companies ("Companies"), pursuant to 47 C.F.R. § 63.25, hereby request Special Temporary Authority ("STA") for a period of 180 days:

1. Business Network Long Distance, Inc.;
2. Network Service Billing, Inc.;
3. Nationwide Long Distance Service, Inc.;
4. Integrated Services, Inc.;
5. Communications Network Billing, Inc.;
6. Multiline Long Distance, Inc.;
7. LCR Telecommunications, LLC;
8. Conectado, Inc.; and
9. National Access Long Distance, Inc.<sup>1</sup>

**Granted**

**date:** November 29, 2018

**authorized by:** Chief, Telecommunications and Analysis Division, International Bureau

**signature** *Verise Coca*

Expires: May 28, 2019

Martin J. Tibbitts, sole owner of the Companies, unexpectedly passed away on July 20, 2018, and his estate (the "Estate" or "Applicant") makes this STA request to operate the Companies while an application for international 214 transfer of control is pending. See File No. ITC-T/C-INTR2018-06228; Submission ID IB2018006228.<sup>2</sup>

Applicant has yet to seek the Commission's consent for the involuntary transfer of control from Martin Tibbitts to the Estate and is requesting this STA as part of a plan to correct any deficiency which may have resulted from this oversight. This oversight is the direct result of the Estate's immediate concern over settling a myriad of matters related to Mr. Tibbitt's untimely death.

The Companies are non-facilities-based interexchange carriers that provide domestic and international long distance telecommunications service on a purely resold basis. Grant of this STA is in the public interest as it will allow the Estate to continue providing uninterrupted telecommunications services to the Companies' customers. Discontinuance of the Companies' services could result in a widespread loss of telecommunications services to end user customers.

Applicant acknowledges that the grant of this STA will not prejudice any action the Commission may take on the underlying transfer of control application. Applicant further acknowledges that this STA can be revoked by the Commission upon its own motion without a

<sup>1</sup> Multiline Long Distance, Inc. is an Ohio corporation and LCR Telecommunications, LLC is a Michigan limited liability company, but the other Companies are all organized under the laws of Nevada.

<sup>2</sup> Conectado, Inc. has been wound down and is no longer in operation. Applicant intends to surrender the international 214 authorization held by Conectado, Inc.

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hearing, and that grant of an STA and the underlying application will not preclude enforcement action.

**Response to Question 15:**

The following owns 100% of each of the Companies:

The Estate of Martin Tibbitts  
714 Grand Marais Street  
Grosse Pointe, MI 48230  
Belinda G. Tibbitts, Special Personal Representative  
Citizenship: US

**Response to Question 16:**

Section 63.18(d) – The Companies have previously received authority<sup>3</sup> under Section 214 of the Act to provide facilities-based service in accordance with section 63.18(e)(1) of the Commission’s rules, and also to provide resale service in accordance with section 63.18(e)(2) of the Commission’s rules.

Section 63.18(e)(3) – Applicant requests no authorizations other than those under 63.18(e)(1) and Section 63.18(e)(2) of the Commission’s rules.

Section 63.18(g) – Not Applicable.

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<sup>3</sup> See File Nos. ITC-214- 20021216-00586; ITC-214-20031124-00537; ITC-214- 20060530-00292; ITC-214-20110512-00132; ITC-214-20021018-00505; ITC-214-0060404-00186; and ITC-214-20050726-00286.