

Attachment to International Section 214 Application

This Application is being filed in connection with a Request for Special Temporary Authority (“STA”), File No. ITC-STA-20181112-00210, and a Joint Application for Authority to Transfer Control, File No. ITC-T/C-20181112-00208, filed on November 12, 2018.

Description of Transaction (Answer to Question 13):

On February 24, 2011, SCP Clearwave LLC (“SCP”), an Arkansas limited liability company, acquired a 70.9% interest (the “Transaction”) in Delta Communications, L.L.C. d/b/a Clearwave Communications (“Clearwave”), an Illinois limited liability company. As a result, SCP obtained majority ownership and control of Clearwave. SCP is affiliated with Stephens Capital Partners, LLC, an Arkansas limited liability company and investment group based in Arkansas. Since 2011, SCP’s interest in Clearwave has increased to 83.1%. In 2013, SCP changed its name to Stephens Clearwave LLC. Clearwave disclosed the SCP ownership interest to the Commission in 2014 when it filed its application for participation in the Commission’s rural broadband experiments (“RBE”) program.¹

The Transaction did not involve the assignment of Clearwave’s telecommunications authorizations or its customers. Customers of Clearwave continued to be served by Clearwave pursuant to its existing authorizations after consummation of the Transaction. The transfer of control was transparent to Clearwave customers.

¹ *Rural Broadband Experiment Support Authorized for Ten Winning Bids for Skybeam, LLC, Consolidated Communications Networks, Inc., Delta Communications LLC, and Allamakee-Clayton Electric Cooperative, Inc.*, 30 FCC Red 8283 (2015).

Answer to Question 10:

63.18(c): The contacts for this Application are

Allison D. Rule
Marashlian & Donahue, PLLC
1420 Spring Hill Road
Suite 401
McLean, VA 22102
703-714-1312 (telephone)
adr@commlawgroup.com

Chérie R. Kiser
Angela F. Collins
Cahill Gordon & Reindel LLP
1990 K Street, NW, Suite 950
Washington, DC 20006
202-862-8900 (telephone)
ckiser@cahill.com
acollins@cahill.com

63.18(d): Clearwave holds blanket domestic Section 214 authority under FCC Filer ID 819867 and global Section 214 authority to provide international facilities-based and resale services under IB File No. ITC-214-20021022-00509.

Answer to Question 11:

After consummation of the Transaction, there were five (5) Stephens family trusts that held a ten percent (10%) or greater indirect ownership interest in Clearwave through SCP:

- (1) Harriet Calhoun Stephens Trust UID 3/22/84;
- (2) Warren A. Stephens Trust UID 9/30/87;
- (3) Miles Stephens WHCT Trust UID 9/30/87;
- (4) John Calhoun Stephens WHCT Trust UID 9/30/87; and
- (5) Laura W. Stephens WHCT Trust UID 9/30/87.

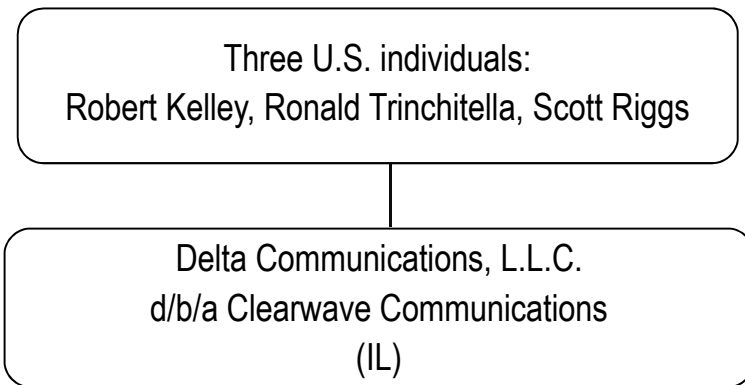
Each of these family trusts is formed under Arkansas law and is based in Arkansas. The trustee for each of the family trusts is a United States citizen. The address of SCP and the family trusts is 111 Center Street, Suite 1600, Little Rock, Arkansas 72201. Stephens Capital Partners and its affiliates hold investments in other telecommunications entities, such as Hargray Communications Group.

After consummation of the Transaction, the remaining interest in Clearwave was held by various individuals, none of which held a ten percent (10%) or greater interest in Clearwave. No officer or director of Clearwave or SCP is also an officer or director of any foreign carrier, and Clearwave and SCP do not have any interlocking directorates with a foreign carrier.

Answer to Question 20:

This Application qualifies for streamlined treatment under Section 63.12 of the Commission's rules because: (1) neither Clearwave, SCP, or any of their affiliates are affiliated with a dominant foreign carrier; (2) as a result of the Transaction, neither Clearwave, SCP, or any of their affiliates were affiliated with any foreign carrier; and (3) none of the other scenarios outlined in Section 63.12(c) of the Commission's rules apply.

DELTA COMMUNICATIONS, L.L.C. BEFORE 2011 TRANSACTION



DELTA COMMUNICATIONS, L.L.C. AFTER 2011 TRANSACTION

