LATHAM&WATKINS LLP

September 16, 2019

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554 555 Eleventh Street, N.W., Suite 1000 Washington, D.C. 20004-1304 Tel: +1.202.637.2200 Fax: +1.202.637.2201

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Re: Section 214 Joint Application for Transfer of Control of Bretton Woods

Telephone Company, Inc. and World Surfer, Inc., WT Docket No. 19-243;

IBFS File No. ITC-T/C-20190827-00146

Dear Ms. Dortch:

Lynch Telephone Corporation IV, LLC ("Lynch IV") and CIBL, Inc. ("CIBL") supplement the above-referenced applications with the following additional information regarding the operations and ownership of Bretton Woods Telephone Company, Inc. ("Bretton Woods") and World Surfer, Inc. ("World Surfer").

World Surfer provides interexchange and international long distances services in all of Bretton Woods's territories, and only provides service where Bretton Woods provides service. World Surfer does not have customers outside of Bretton Woods's service areas. CIBL confirms that after the close of the transaction, Bretton Woods will continue to serve as the billing and collection agent for World Surfer.

In addition, CIBL confirms that neither E3M 2016 LLC, nor Regina Pitaro have any 10 percent or greater interests in any other domestic telecommunications provider.

If you have any questions regarding this submission, please do not hesitate to contact me.

Respectfully submitted,

/s/

Elizabeth R. Park

cc: Greg Kwan
David Burns