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September 16, 2019

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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Re: Section 214 Joint Application for Transfer of Control of Bretton Woods Telephone Company, Inc. and World Surfer, Inc., IBFS File No. ITC-T/C-20190827-00146

Dear Ms. Dortch:

Lynch Telephone Corporation IV, LLC (“Lynch IV”) supplements the above-referenced application to clarify the ownership of World Surfer, Inc. (“World Surfer”).

As described in the application, World Surfer is an indirect, wholly owned subsidiary of LICT Corporation (“LICT”). Lynch IV directly owns 100 percent of World Surfer. Lynch IV, in turn, is directly, wholly owned by Lynch Telephone North LLC, which is directly, wholly owned by Brighton Communications Corporation (“Brighton”). LICT owns a 100 percent direct interest in Brighton.

In its original application for international Section 214 authority, World Surfer indicated that it was “a wholly-owned subsidiary of LICT Corporation,” but did not identify any intervening entities. *See* IBFS File No. ITC-214-20120106-00002, Attachment 2. Lynch IV clarifies that at the time of the original application, LICT *indirectly* owned 100 percent of World Surfer, and that the ownership structure of World Surfer has not changed since the original application.

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

Respectfully submitted,

/s/

Elizabeth R. Park

cc: Sumita Mukhoty