

DESCRIPTION OF TRANSACTION

By this application, and pursuant to Rule 63.24, Fiona Harlan (“Mrs. Harlan”) as Trustee of the Harlan Family Trust dated August 21, 2018 (the “Trust”), and the Trust (collectively, the “Applicants”), hereby notify the Commission of the correct ownership of Aeneas Communications, LLC (“Aeneas”). Aeneas was granted international Section 214 authority on November 8, 2019, ITC-214-20191010-00167. In Attachment 2 to Aeneas’ application for international Section 214 authority, Mrs. Harlan was reported as being the sole member of Aeneas. In fact, the Trust is the sole member and holds 100 percent of the membership interests in Aeneas, and Mrs. Harlan is the sole trustee and life beneficiary of the Trust. Pursuant to instructions from Commission staff, this application is styled as a notification of *pro forma* transfer of control of the international Section 214 authority held by Aeneas with Mrs. Harlan identified as the “Transferor” and the Trust identified as the “Transferee.” There was, however, no actual transfer of control of Aeneas (or assignment of the membership interests in Aeneas) from Mrs. Harlan to the Trust. The Trust was the sole member of Aeneas, and Mrs. Harlan was the sole Trustee and life beneficiary of the Trust, at the time that Aeneas applied for and received international Section 214 authority.

In support of this application, the Applicants submit the following information pursuant to Section 63.24(f)(2)(i) of the Commission’s rules for the transferee:

§ 63.18(a) Name, address, and telephone number.

Transferee:

Harlan Family Trust dated August 21, 2018
71 Poplar Plains
Jackson, TN 38305
FRN: 0029000213
Attention: Fiona Harlan, as Trustee of the Harlan Family Trust dated August 21, 2018
FRN: 002900197
Phone: 731-431-0154

§ 63.18(b) State under the laws of which Transferee is organized.

Transferee: The Trust was formed and exists under the laws of Tennessee.

§ 63.18(c) Name, title, address, and telephone number of an officer and legal counsel.

Fiona Harlan
Trustee of the Harlan Family Trust dated August 21, 2018
71 Poplar Plains
Jackson, TN 38305
Phone: 731-431-0154
E-mail: Fiona@aeneas.net

Legal Counsel to Transferee (to whom correspondence should be addressed):

Gregory W. Whiteaker
Robin Tuttle
Herman & Whiteaker, LLC
6720-B Rockledge Drive, Suite 150
Bethesda, MD 20817
Phone: (202) 600-7274 and (202) 827-0667
E-mail: greg@hermanwhiteaker.com,
rtuttle@hermanwhiteaker.com

§ 63.18(d) Statement about previous international Section 214 authorizations.

Aeneas holds an international Section 214 authorization, File No. ITC-214-20191010-00167, to provide global or limited global resale service.

§ 63.18(h) Disclosable Interest Holders and Interlocking Directorates with Foreign Carriers.

The Trust holds 100% of the membership interests in Aeneas. Mrs. Harlan is the Trustee and sole life beneficiary of the Trust. Mrs. Harlan is a U.S. citizen. The address for Mrs. Harlan is 71 Poplar Plains, Jackson, TN 38305. Mrs. Harlan's phone number is 731-431-0154 and her e-mail address is Fiona@aeneas.net.

There are no interlocking directorates with a foreign carrier.

This correction to the reported ownership of Aeneas is *pro forma* in nature since Mrs. Harlan is the sole Trustee of the Trust and has ultimate control of Aeneas through the Trust.