

LINCOLN OFFICE
301 South 13th Street, Suite 500
Lincoln, Nebraska 68508-2578
Telephone (402) 437-8500
Fax (402) 437-8558



WOODS|AITKEN LLP

DENVER OFFICE
8055 East Tufts Avenue, Suite 525
Denver, Colorado 80237-2994
Telephone (303) 606-6700
Fax (303) 606-6701

OMAHA OFFICE
10250 Regency Circle, Suite 525
Omaha, Nebraska 68114-9625
Telephone (402) 898-7400
Fax (402) 898-7401

THOMAS J. MOORMAN
DIRECT: (202) 944-9502
tmoorman@woodsaitken.com
www.woodsaitken.com

WASHINGTON, D.C. OFFICE
5335 Wisconsin Avenue, N.W., Suite 950
Washington, D.C. 20015-2163
Telephone (202) 944-9500
Fax (202) 944-9501

Please respond to Washington address

March 23, 2020

VIA IBFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Re: Supplement
File No. ITC-T/C-20200310-00040

Dear Ms. Dortch:

K&S Communications, Inc., Champlain Telephone Company, and PrimeLink, Inc. ("PrimeLink"), by counsel, hereby files this supplement in the above-referenced international transfer of control proceeding attaching a submission made on Friday, March 20, 2020 in the companion domestic transfer of control proceeding found in WC Docket No. 20-78.

Please contact the undersigned should you have any questions or require additional information.

Respectfully submitted,

Thomas J. Moorman
Counsel to PrimeLink, Inc., K&S Communications, Inc.
and Champlain Telephone Company

Attachment


cc: D. Kretch, International Bureau, via email
S. Mukhoty, International Bureau, via email
D. Johnson, Wireline Competition Bureau, via email
B. Ferenchak, Morgan, Lewis & Bockius LLP, via email

For assistance with using ECFS, please contact the ECFS Help Desk at 202-418-0193 (tel:+12024180193) or via email at ECFSHelp@fcc.gov (mailto:ECFSHelp@fcc.gov).

Submit a Filing

1 **Filing** 2 **Review** 3 **Confirmation**

Proceeding:	20-78
Confirmation #:	202003201925710398
Submitted:	Mar 20, 2020 3:28:54 PM
Status:	RECEIVED
Name(s) of Filer(s)	PrimeLink, Inc., K&S Communications, Inc., and Champlain Telephone Company
Law Firm(s)	Woods Aitken LLP
Attorney/Author Name(s)	Thomas J. Moorman
Primary Contact Email	tmoorman@woodsaitken.com
Type of Filing	SUPPLEMENT
File Number	
Report Number	
Bureau ID Number	
Address of	Law Firm
Address	5335 Wisconsin Ave., N.W. Suite 950, Washington, DC, 20015
Email Confirmation	Yes

Submit Another  (/ecfs/filings)

For assistance with using ECFS, please contact the ECFS Help Desk at 202-418-0193 (tel:+12024180193) or via email at ECFSHelp@fcc.gov (mailto:ECFSHelp@fcc.gov).

Federal Communications Commission
445 12th Street SW, Washington, DC 20554
Phone: 1-888-225-5322
TTY: 1-888-835-5322
ASL Video Call: 1-844-432-2275
ASL Call Portal (Web)
Fax: 1-866-418-0232

Contact Us (<https://www.fcc.gov/contact-us>)

LINCOLN OFFICE

301 South 13th Street, Suite 500
Lincoln, Nebraska 68508-2578
Telephone (402) 437-8500
Fax (402) 437-8558



WOODS | AITKEN LLP

DENVER OFFICE

8055 East Tufts Avenue, Suite 525
Denver, Colorado 80237-2994
Telephone (303) 606-6700
Fax (303) 606-6701

OMAHA OFFICE

10250 Regency Circle, Suite 525
Omaha, Nebraska 68114-9625
Telephone (402) 898-7400
Fax (402) 898-7401

THOMAS J. MOORMAN

DIRECT: (202) 944-9502
tmoorman@woodsaitken.com
www.woodsaitken.com

WASHINGTON, D.C. OFFICE

5335 Wisconsin Avenue, N.W., Suite 950
Washington, D.C. 20015-2163
Telephone (202) 944-9500
Fax (202) 944-9501

Please respond to Washington address

March 20, 2020

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

**Re: Supplement
WC Docket No. 20-78**

Dear Ms. Dortch:

K&S Communications, Inc., Champlain Telephone Company, and PrimeLink, Inc. ("PrimeLink"), by counsel, hereby files this supplement in the above-referenced proceeding attaching a submission made today correcting, among other items, inadvertent errors and omissions in PrimeLink's 1999 application which was granted on October 13, 1999, under the File No. ITC-214-19990924-00588. See Public Notice, Report No. TEL-00145, DA 99-2181, released October 15, 1999.

Please contact the undersigned should you have any questions or require additional information.

Respectfully submitted,

Thomas J. Moorman
Counsel to PrimeLink, Inc., K&S Communications, Inc.
and Champlain Telephone Company

Attachment

cc: D. Kretch, International Bureau, via email
S. Mukhoty, International Bureau, via email
D. Johnson, Wireline Competition Bureau, via email
B. Ferenchak, Morgan, Lewis & Bockius LLP, via email

LINCOLN OFFICE
301 South 13th Street, Suite 500
Lincoln, Nebraska 68508-2578
Telephone (402) 437-8500
Fax (402) 437-8558



WOODS | AITKEN LLP

DENVER OFFICE
8055 East Tufts Avenue, Suite 525
Denver, Colorado 80237-2994
Telephone (303) 606-6700
Fax (303) 606-6701

OMAHA OFFICE
10250 Regency Circle, Suite 525
Omaha, Nebraska 68114-9625
Telephone (402) 898-7400
Fax (402) 898-7401

THOMAS J. MOORMAN
DIRECT: (202) 944-9502
tmoorman@woodsaitken.com
www.woodsaitken.com

WASHINGTON, D.C. OFFICE
5335 Wisconsin Avenue, N.W., Suite 950
Washington, D.C. 20015-2163
Telephone (202) 944-9500
Fax (202) 944-9501

Please respond to Washington address

March 20, 2020

VIA IBFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Re: Supplement in File No. ITC-214-19990924-00588

Dear Ms. Dortch:

PrimeLink, Inc. ("PrimeLink") hereby files this supplement correcting inadvertent errors and omissions in its 1999 application (the "1999 Application") which was granted on October 13, 1999, under the above-referenced file number. *See* Public Notice, Report No. TEL-00145, DA 99-2181, released October 15, 1999. This supplement is being filed based on a recent review of the representations regarding PrimeLink's ownership made in the 1999 Application with various Commission Staff conducted in connection with a recently filed transfer of control application involving PrimeLink ("2020 Transfer Application").¹ PrimeLink and its parent companies regret the inadvertent omissions and errors described below and intend for this supplement to correct the Commission's records. The two corrections are as follows.

First, the 1999 Application inadvertently omitted PrimeLink's direct parent company, K&S Communications, Inc. ("K&S") from PrimeLink's ownership structure. K&S was at the time² and remains the direct parent company of PrimeLink. K&S is wholly owned by Champlain Telephone Company ("CTC").

Second, the 1999 Application contains an inadvertent error when it stated that CTC did not have any 10% or greater shareholders.

¹ *See* File No. ITC-T/C-20200310-00040; WC Docket No. 20-78.

² K&S Communications, Inc. was identified as a holding company in PrimeLink's 1997 application for resale international Section 214 authorization filed under PrimeLink's then existing name of "ChampNet Communications." *See Application of ChampNET Communications for authorization under Section 214 of the Communication Act of 1934, as amended, to Resell International Switched Telecommunications Services*, Application at p. 1, File No. ITC-214-19970324-00166 (Mar. 1997).

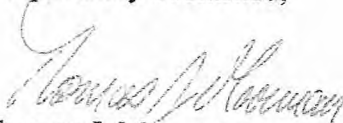
In footnote 4 of the 2020 Transfer Application, PrimeLink reported its ownership history. With one correction (highlighted in yellow below) that did not affect control of CTC, the report found in footnote 4 of the 2020 Transfer Application is provided below and is confirmed by Mark Webster, Controller of PrimeLink, K&S, and CTC. *See* Declaration of Mark T. Webster (attached). The correction reflects Mr. Webster's understanding that the stock held by Mr. Southwick was transferred to his estate and then distributed to his heirs upon closing of Mr. Southwick's estate in 2014. CTC and PrimeLink also regret that this clarification was not included in the original referenced footnote 4.

For completeness, CTC provides the following information regarding the history of its 10% or greater shareholders. At the time of the submission of the 1997 application, Edith Knapp (United States citizen) and David Southwick (United States citizen) were the two 10% or greater shareholders of CTC. Ms. Knapp, Trent Trahan (United States citizen) and James Kaufman (United States citizen) jointly controlled the voting trust of the ownership held by Ms. Knapp on behalf of her family. At the time of the 1999 Application, Ms. Knapp had died, and Messrs. Trahan and Kaufman had purchased Ms. Knapp's interest and became greater than 10% owners of CTC. Shortly before the submission of the 1999 application noted above, Messrs. Trahan and Kaufman formed Tandem Partners, LLC each owning 50%, resulting in a 50.07% in CTC. In August of 2001, Mr. Trahan purchased Mr. Kaufman 50% interest in Tandem Partners, LLC and, in 2002, Tandem Partners, LLC changed its name to Tandem, LLC, a New York limited liability company. With Mr. Southwick's death in 2007, the CTC stock held by Mr. Southwick became part of his estate and, upon closing of Mr. Southwick's estate, the stock was transferred to his identified heirs in 2014, which resulted in, at that time, the sole remaining 10% or greater shareholder of CTC being Tandem, LLC, which is wholly-owned as noted above by Mr. Trahan. Mr. Southwick's death and subsequent distribution of his ownership shares did not change the control of CTC. All less than 10% shareholders of CTC are United States citizens.

Again, PrimeLink, K&S and CTC regret the inadvertent omissions and errors described above. CTC will arrange for this letter to be submitted as a supplement in the 2020 Transfer Application.

Please contact the undersigned should you have any questions or require additional information.

Respectfully submitted,



Thomas J. Moorman
Counsel to PrimeLink, Inc., K&S Communications, Inc.
and Champlain Telephone Company

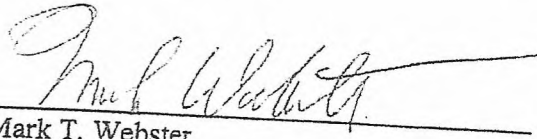
Attachment

cc: D. Kretch, International Bureau, via email
S. Mukhoty, International Bureau, via email
D. Johnson, Wireline Competition Bureau, via email
B. Ferenchak, Morgan, Lewis & Bockius LLP, via email

DECLARATION

I, Mark T. Webster, hereby declare that I am Secretary and Controller of Champlain Telephone Company, K & S Communications, Inc. and PrimeLink, Inc. (collectively, the "Companies"); that I read the forgoing supplement; and that contents of the supplement with respect to the Companies are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 20 day of March, 2020.



Mark T. Webster
Secretary and Controller
Champlain Telephone Company, K & S Communications,
Inc.
PrimeLink, Inc.