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March 15, 2021

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

Re: *Wholesale Carrier Services, Inc., Transferor, and Thompson Street Capital Partners V, L.P.*, WC Docket No. 21-76; ITC-T/C-20210301-00041

Dear Ms. Dortch:

In response to questions from staff in the Wireline Competition Bureau, the parties to the above-referenced application supplement the application filed on March 1, 2021 by noting as follows:

- James Cooper and Robert Dunn, who ultimately control the Transferee, do not hold a 10% or greater interest in any Section 214 authorization holder other than those disclosed in the application.¹
- WCS is currently—prior to consummation of the transaction at issue in the above-referenced application—100% owned by Christopher S. Barton.
- With the exception noted below, all of the customers of the subsidiaries of BCM One Group Holdings, Inc., ultimately controlled by Transferee, are business customers including offices; retail security systems; building alarm and elevator systems; and other similar businesses. The subsidiaries of BCM One Group Holdings, Inc. do not have any residential customers. PayG, LLC, however, has a customer base almost entirely made up of resellers.
- The attached Exhibit 1 is a list of states in which WCS has customers.

¹ BCM One Group Holdings, Inc. owns and controls subsidiaries, such as nexVortex, Inc. and Siptrunk, Inc., which offer related and complementary services to those offered by Section 214 authorization holders that are subsidiaries of BCM One Group Holdings, Inc., but are not themselves holders of Section 214 authorizations or any other telecommunications authorizations, licenses, permits, certificates, or approvals.

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- The attached Exhibits 2-5 provide the available services and states in which there are customers for each BCM One Group Holdings, Inc. subsidiary that holds a Section 214 authorization: BCM One, Inc.; SIP.US LLC; Arena One, LLC; and PayG, LLC. Because the subsidiaries are separately operated, they do not all maintain their data in the same manner. Moreover, many of the services disclosed are obtained by the entity on a reseller basis and/or do not require a Section 214 authorization or other license, permit, certificate, or approval.

Counsel for WCS has authorized the undersigned to represent that WCS consents to the filing of this supplement. Please let us know if you have any further questions.

Sincerely,



Marc A. Korman

*Counsel for Thompson Street
Capital Partners V, L.P.*

EXHIBIT 1

WCS States With Customers

State

Alabama

Arizona

Arkansas

California

Colorado

Connecticut

D.C.

Delaware

Florida

Georgia

Illinois

Indiana

Iowa

Kansas

Kentucky

Louisiana

Maine

Maryland

Massachusetts

Michigan

Minnesota

Mississippi

Missouri

Nebraska

Nevada

New Hampshire

New Jersey

New Mexico

New York

North Carolina

North Dakota

Ohio

Oklahoma

Oregon

Pennsylvania

Rhode Island

South Carolina

Tennessee

Texas

Utah

Vermont

Virginia

Washington

West Virginia

Wisconsin

Wyoming

EXHIBIT 2

BCM One, Inc. Services and States with Customers

Services

BaaS Cable Internet
BaaS Cable Internet TV
BaaS Cable Voice
BaaS Ethernet Service
BaaS Internet Service
Broadband w/Dynamic IP
Broadband w/Static IP
Broadband w/TV
Broadband w/Voice
Business Applications Exchange
Business Applications O365
Business Applications Service
Business Basic Seat
Business Basic w/UCC Seat
Business Call Center Seat
Business Seat
BYOB Business Basic Metered
BYOB Business Basic Voice (w/UCC)
BYOB InPacket Business Basic
BYOB InPacket Business Call Center
BYOB InPacket Business Plus
Cable Voice Line
Collaboration Voice Seat
Common Seat
Delaware (COTA)
DIA
DID
Disability Access / Enhanced 911 Service
Disability Access/Enhanced 911 Svc-Multiline
DSL
Dynamic DID
E911
Edge - Equipment - Router
Edge - SD WAN
EDGE - VitalView M&R Service
Edge Full Management Plus
Edge VitalView Full Offering Service
Edge VitalView Manage & Restore Service
Edge VitalView Monitor & Notify Service
EFAX
Firewall
Full Management
IL Telecom Relay Serv & Equipment - Bus. Std.
IL Telecom Relay Serv & Equipment - Bus. VOIP
Integrated WAN
KORE FL Wireless - ATT 1GB

KORE FL Wireless - TMO 1GB
KORE FL Wireless - VZ 1GB
KORE HW Wireless - ATT 1GB
KORE HW Wireless - TMO 1GB
KORE HW Wireless - TMO 2GB
KORE HW Wireless - VZ 1GB
KORE PT Wireless - VZ 10GB
KORE SP Wireless - ATT 20GB
KORE SP Wireless - ATT 5GB
KORE SP Wireless - VZ20GB
KY PSC Maintenance Assessment
License
LL BaaS Cable Service
LL BaaS NC Cable Service
LL BaaS NC Internet Service
LL ONE 4G SIM Card
LL ONE 4G Wireless Data Service
LL ONE Cable Service
LL ONE Equipment
LL ONE Internet Service
LL ONE Private Line
LL ONE SDN PRI Service
Managed Client Service
Managed PRI
Marketplace -Hosted VOIP
Missouri PSC Annual Assessment
Monitor & Notify
Monitor & Restore
Monitor & Restore & Config Mgmt
MPLS
Nevada Universal Service
ONE - 4G Wireless Data Service
ONE - 4G Wireless Router
ONE - Business Connect - Data Back-Up - 20MB
ONE - Business Pooled - 10GB
ONE - Business Pooled - 20GB
ONE - Business Pooled - 5GB
ONE - Cloud Intelligence - CSP
ONE - Cloud Intelligence - DPOR
ONE – Managed VoIP Productivity Base IN
ONE – Microsoft License
ONE – Microsoft Support
ONE – Microsoft Voice InPacket
One (legacy) Vitalview - Basic
One Analog MPLS Service
One Analog T1 Service
One Analog Voice Channel

ONE Analog VoIP Service
One Cable Internet Services
One Centrex Service - Resale
One Centrex Service - UNE L
One Centrex Service - UNE T
One Centrex Service - UNEP
One Colocation Service
One DID Numbers
One Digital T1 Service
One DSL Service
One Dynamic Ethernet Service
One Dynamic Internet
One Dynamic MPLS Service
ONE Dynamic Service
ONE Dynamic SIP
One Dynamic T1
One Dynamic T1-Voice Channels
ONE Dynamic VitaView Monitor & Restore
One Ethernet Internet
One Ethernet MPLS
One Ethernet Private Line
One Failsafe Number
One FiOs w. Dynamic IP Addressing
One FiOs w. Static IP Addressing
One Hardware Sales
One InPacket Auto Attendant
One InPacket Business
One InPacket Business Basic
One InPacket Business Basic Metered
One InPacket Business Basic Voice (w/UCC)
One InPacket Business Call Center
One InPacket Business Plus
ONE InPacket BYOB Service
One InPacket Collaboration Seat
One InPacket Collaboration/O365 Business Prem
One InPacket Common Seat
One InPacket Conference Bridge
One InPacket DID
One InPacket Digital Fax
One Inpacket eFax
One InPacket Internet NxT1
One InPacket Internet T1
One InPacket Managed Router
One Inpacket Toll Free Service
One InPacket Virtual Extension
One Integrated Access Service
One Intelligent Network COS Access Circuit

One Intelligent Network DIA
One Intelligent Network DIA Ethernet
ONE Intelligent Network LEC ID
ONE Intelligent Network Managed Internet Servi
One Intelligent Network Managed Router
One Intelligent Network Managed SIP
One Intelligent Network Managed VOIP
One Intelligent Network Managed VOIP Collaboration
One Intelligent Network MNGD VOIP Virtual Ext
One Intelligent Network MNGD SIP - Interface IP
One Intelligent Network MNGD SIP Service - DID
One Intelligent Network MNGD SIP Service - MPLS
One Intelligent Network MNGD SIP Service - Router
One Intelligent Network MNGD VOIP Business Basic
One Intelligent Network MNGD VOIP Business Call Ce
ONE Intelligent Network MNGD VOIP Business Seat
ONE Intelligent Network MNGD VOIP Common Seat
One Intelligent Network MNGD VOIP DID
One Intelligent Network MNGD VOIP Efax
One Intelligent Network MNGD VOIP Equipment Router
ONE Intelligent Network MPLS Service
ONE Intelligent Network Service
ONE Intelligent Network VRF
ONE Intelligent Network VV Monitor & Notify Servic
ONE Intelligent Network VV Monitor& Restore Servic
One Internet Service
One Internet Service - NxT1
One ISDN BRI Service - Resale
One ISDN BRI Service - UNEP
One ISDN PRI Service
One Managed Firewall Service
One Managed PRI
One Managed Router Service
One Managed SIP Interface IP
ONE Managed SIP Service
One Managed SIP Service DIA
One Managed SIP Service DID
One Managed SIP Service Efax
One Managed SIP Service MPLS
One Managed SIP Service Router
One Managed VOIP DID
ONE Managed VOIP Service - Business Plus Seat
ONE Managed VOIP Service - Business Seat
One Managed VOIP Service - COS Access Circuit
One Managed VOIP Service - Equipment - Router
One Managed VOIP Service - Equipment - Switch
ONE Managed WAN Internet Service

ONE Managed WAN Managed Router
ONE Managed WAN MPLS Service
ONE Managed WAN Service
ONE Managed WAN VitalView Full Offering Service
ONE Managed WAN VitalView Monitor & Notify Servic
ONE Managed WAN VitalView Monitor& Restore Servic
ONE Managed WAN VitalView Service
ONE Managed Wifi Service
One McGraw Provided Router
One MPLS - NxT1
One MPLS Service
One Outbound Dedicated Service
One Outbound Dedicated Service DS3
One POTS Service - Resale
One POTS Service - UNE L
One POTS Service - UNE T
One POTS Service - UNEP
One Private Line - DS3
One Private Line - International
One Private Line-Interstate
One Private Line-Intrastate
One Professional Service - Microsoft
One Remote Call Forwarding (RCF) - Resale
One Remote Call Forwarding (RCF) - UNEL
One Remote Call Forwarding (RCF) - UNEP
One Remote Call Forwarding-Carrier
ONE- SD WAN
ONE- SD WAN Zone Based Firewall
One SIP DID
One SIP eFax
One SIP EOC
One SIP EOF
One SIP Internet T1
One SIP Managed Router
One SIP Trunk Service
One Switched LD Service
One Toll Free - International
One Toll Free Dedicated Service
One Toll Free Switched Service
One Trunk Group
One Trunk Service - Resale
One Trunk Service - UNEP
ONE VitalView Full Offering Services
ONE VitalView Monitor & Notify Services
ONE VitalView Monitor & Restore Services
One Voicemail Service
One VPN Site to Site Service

POTS
POTS in a Box - Lines
PRI
Private Line
PST - Business Service
PT KORE Wireless - ATT 10GB
PUC
PUC Reimbursement
PUC Reimbursement-local
QST
RCF
Router
SC Telephone Relay Service (TRS)
SD WAN
SIP
Switch
Telecommunications Relay Service
Texas Universal Service
Toll Free
Toll Free Switched
UCaaSone Basic
UCaaSone Call Center
UCaaSone Premium
UCaaSone Premium + UC1
UCaaSone V-Fax
UCaaSone V-Receptionist
Universal Service - Business Lines
Universal Service - MTS & WATS
Usage
VAT
V-Fax
Virtual Extension
WiFi
Wireless
Wireless Broadband
Wisconsin PSC Remainder Assessment

State

Alabama
Arkansas
Arizona
California
Colorado
Connecticut
District of Columbia
Delaware
Florida
Georgia
Hawaii
Iowa
Idaho
Illinois
Indiana
Kansas
Kentucky
Louisiana
Massachusetts
Maryland
Maine
Michigan
Minnesota
Missouri
Mississippi
Montana
North Carolina
North Dakota
Nebraska
New Hampshire
New Jersey
New Mexico
Nevada
New York
Ohio
Oklahoma
Oregon
Pennsylvania
Rhode Island
South Carolina
South Dakota
Tennessee
Texas
Utah
Virginia
Vermont

Washington
Wisconsin
West Virginia
Wyoming

EXHIBIT 3

SIP.US LLC Services and States with Customers

Services

Over the Top SIP Trunking

Interstate and Intrastate Service (minute plans/bundles, Call paths and pay by the minute)

Toll Free Service (minute plans/bundles and pay by the minutes)

DIDs

Toll Free DIDs

911 service

SMS

MMS

Fax Over the Internet

State

Alabama

Alaska

Arizona

Arkansas

California

Colorado

Connecticut

Delaware DC

Florida

Georgia

Hawaii

Idaho

Illinois

Indiana

Iowa

Kansas

Kentucky

Louisiana

Maine

Maryland

Massachusetts

Michigan

Minnesota

Mississippi

Missouri

Montana

Nebraska

Nevada

New Hampshire

New Jersey

New Mexico

New York

North Carolina

North Dakota

Ohio

Oklahoma

Oregon

Pennsylvania

Rhode Island

South Carolina

South Dakota

Tennessee
Texas
Utah
Vermont
Virginia
Washington
West Virginia
Wisconsin
Wyoming

EXHIBIT 4

Arena One, LLC Services and States with Customers

Services

Broadworks Service Provider

Broadworks User

Conference Service

Data Service

UCaaSone

UCaaSone WS

Voice Services

Wireless Service

State

Alabama

Arizona

California

Connecticut

District of Columbia

Florida

Georgia

Hawaii

Iowa

Illinois

Indiana

Kansas

Massachusetts

Maryland

Michigan

North Carolina

New Hampshire

New Jersey

New York

Oklahoma

Pennsylvania

South Carolina

Tennessee

Texas

Virginia

EXHIBIT 5

PayG, LLC Services and States with Customers

Services

1.5% Multi-Location Discount
14-Day Camera Storage
14-Day Camera Storage 100+
14-Day Camera Storage 500+
30-Day Camera Storage
30-Day Camera Storage 100+
30-Day Camera Storage 500+
3CX Hosting, Storage & Networking Services
3CX PBX Hosting Setup
3CX PBX License(s)
4 Hour Camera Storage
60-Day Camera Storage
60-Day Camera Storage 100+
60-Day Camera Storage 500+
7-Day Camera Storage
7-Day Camera Storage 100+
7-Day Camera Storage 500+
888VoIP Manual Online Order
90-Day Camera Storage
90-Day Camera Storage 100+
90-Day Camera Storage 500+
911 Call US & Canada NRC
911 DID Registration Fee
911 DID US & Canada MRC
911 Setup Fee
911 Unregistered Call
Account Holder
API Access
API Access 100+
API Access 1000+
API Access 500+
API Access Setup
Archived Call Recording Setup
Automated CDR Export Setup
Billing Services \$1.5M+ MRC
Billing Services \$1M+ MRC
Billing Services \$500K+ MRC
Billing Services MMC
Billing Services MRC
Billing Services Setup
Branded Tier 1 Support
Branded Tier 1 Support 100+
Branded Tier 1 Support 1000+
Branded Tier 1 Support 500+
Branded Tier 1 Support MMC
Business Environment OneTime Credit

BYO Telco Setup
BYOT Channel - MRC
BYOT DID - MRC
BYOT DID NRC
Call Center Seat
Call Center Seat 100+
Call Center Seat 1000+
Call Center Seat 2501+
Call Center Seat 500+
Call Center Seat 5001+
Call Forward Seat
Call Recording
Call Recording 100+
Call Recording 1000+
Call Recording 2501+
Call Recording 500+
Call Recording 5001+
CamCommand MMC
CamCommand Setup Fee
Canada Directory Listing MRC
Cloud2Edge Legacy Edgeview Device Charge
Cloud2Edge Monitoring Services
Cloud2Edge SD-WAN
Cloud2Edge SIP Survivability
CNAM Delivery MRC
CNAM Delivery MRC 100+
CNAM Delivery MRC 250+
CNAM Delivery MRC 450+
CNAM Delivery NRC
CNAM Storage or Update
Compliance and Recovery Fee
Cost Recovery Fee
CSR Fee
Data Entry Services Hourly
DialPlate License
Directory Listing Insertion
Early Termination Credit (36months)
ENUM DID Routing Services
ENUM DID Routing Services 100K+
ENUM DID Routing Services 50K+
Equipment RMA
Expedite Port Fee
Fax - Store and Forward to ATA Minutes
HIPAA Annual Compliance Services
HIPAA Monthly Compliance Services
Huddle Room Appliance TEP-1080
Inbound DID Dedicated Channel

Infiot iXEdge-100 Lite-3Y
Infiot iXEdge-1000 Lite-3Y
Infiot iXEdge-101 Lite-3Y
Instant Fax ATA
Instant Fax ATA - Equipment
Instant Fax Portal
INTL Channel - Global
INTL Channel - Zone A
INTL Channel - Zone B
INTL Channel - Zone C
INTL Channel Setup
INTL DID MRC
INTL DID Setup
INTL LNP Fee
INTL TF MRC
Jenne Manual Online Order
Late Fee
LNP Bulk Port Fee
LNP Port Cancel Fee Per TN within 24 Hours FOC
LNP Port Cancel Fee Per TN within 48 Hours FOC
LNP Port Cancellation Fee/Change Fee 48 Hours
LNP Port Cancellation Fee/Change Fee 6 Hours
LNP Port Change Fee Snap Back
LNP Port CNX Fee Per TN After Order Submission
Low Usage Domain Seat Credit
MRC - Marketing/Demo Credit
NNI Cross Connect
Onboarding Certification Fee
Online Store - CloudCash Credit
Order & Billing Management Professional Services
Order & Billing Management Professional Services 100+
Order & Billing Management Professional Services 1000+
Order & Billing Management Professional Services 500+
Order & Billing Management Professional Services MMC
Order & Billing Management Professional Services Setup
PBX Fone License
Port Cancellation Fee Per TN
Port Change Order Fee Per TN
Port Fee
Port Out Fee Per TN
Port Trigger Fee
Prepaid Platform
Prepaid Platform 100+
Prepaid Platform 1000+
Prepaid Platform 500+
Prepaid Telco Services Usage
Professional Services

Quoter/SocketApp License
ReachUC Mondago - CRM
ReachUC Mondago - Express
ReachUC Plus (Qty 100-499)
ReachUC Plus (Qty 1000+)
ReachUC Plus (Qty 2501+)
ReachUC Plus (Qty 500-999)
ReachUC Plus (Qty 5001+)
ReachUC Plus (Qty 0-99)
ReachUC Private Label Branding
ReachUC WebRTC Private Label Branding
Service Credit
Services Setup & Training
Shipping & Handling
Simple WAN Inclusive Monthly Services
Simple WAN STD Monthly Services
SimpleWan Advanced (SW301DA-NA)
SimpleWan Advanced 2 (SW302DA-NA)
Simplewan Advanced II SkySwitch Rental (SW302DA-NAR)
Simplewan Advanced SkySwitch Rental (SW301DA-NAR)
Simplewan Basic Monitoring (SWBM)
Simplewan Basic Monitoring/Support (SWSBP)
Simplewan Content Filtering (SWUBCF)
Simplewan Cyber Security Pkg. (SWCSP)
Simplewan Dual Wan Failover (SWFO)
Simplewan Premium Support (SWEUS)
SimpleWan Professional (SW251DA-NA)
Simplewan Professional SkySwitch Rental (SW251DA-NAR)
Simplewan Sky Basic Monitoring (SWSKY)
Simplewan Sky Basic Monitoring/Support (SWSKYP)
Simplewan Software Defined Voice (SDV)
Simplewan SW Advanced NFR (SW301DA-NFR)
Simplewan SW Advanced+ Wireless (SW301DA-WI)
Simplewan SW RackMount (SW601QA-FARM)
Simplewan SW VM Unit (SW601VM-NA)
Simplewan Unifi Wireless Access (SWUF)
Simplewan vMPLS (SWVMPLS)
Simplewan WiFi AddOn (SWWFI)
SimpleWan Wifi LTE Hotspot Bridge Dongle (SWWIFBR2)
SIP Trunk - Per Call Channel
SIP Trunk - Per Call Channel 100+
SIP Trunk - Per Call Channel 1000+
SIP Trunk - Per Call Channel 2501+
SIP Trunk - Per Call Channel 500+
SIP Trunk - Per Call Channel 5001+
SMS (per DID) Qty 251-499
SMS (per DID) Qty 500+

SMS (per DID) Qty. 0-250
SMS Bot 20 User
SMS Bot 50 User
SMS Bot Unlimited User
SMS per DID setup
SNAP HD
SNAP HD +1000 Users
SNAP HD +250 Users
SNAP HD +50 Users
Spam - Nomorobo
Support Ticketing License
Switch Ports
Teams Connector
Teams Connector
Teams Connector
Teams Connector
Teams Connector
Teams Connector
Teams Connector Setup
Telecom Recovery Fee
Ten Fold CRM Monthly (TFLD)
TenFold CRM Basic
TenFold CRM Enterprise
TenFold CRM Pro
TenFold CRM Teams
Tier A DID
Tier B DID
Tier C DID
Tier D DID
Toll Free DID MRC
Toll Free DID MRC 100+
Toll Free DID MRC 250+
Toll Free DID MRC 450+
Toll Free DID NRC
US & Canada DID MRC
US & Canada DID MRC 100+
US & Canada DID MRC 250+
US & Canada DID MRC 450+
US & Canada DID NRC
User Group Conference - Vectors Pass
User Group Dinner
User Group Event Guest Fee
User Seat
User Seat 100+
User Seat 1000+
User Seat 2501+
User Seat 500+

User Seat 5001+
VBroadcast Activation
Vectors Conference - Promo
Vectors Pass Promo Credit
Vectors Sponsor
Virtual SIP Trunk Management DID Minutes
Virtual SIP Trunk Management DID MRC
Virtual SIP Trunk Management Minimum Monthly Commitment
Virtual SIP Trunk Management Setup
Virtual SIP Trunk Management Switching Fee MRC
Virtual SIP Trunk Management Toll Free Minutes
Virtual SIP Trunk Management Toll Free MRC
Voice Mail Notify Activation
Voicemail Transcription
Voicemail Transcription 100+
Voicemail Transcription 1000+
Voicemail Transcription 2501+
Voicemail Transcription 500+
Voicemail Transcription 5001+
Web Centrex Hosted PBX MMC
Web Centrex Switch Setup & Training
Web Conferencing MMC
Web Conferencing Setup
Web Conferencing Video Add-on - Rooms
Web Conferencing Video Add-on - Rooms Qty 1000+
Web Conferencing Video Add-on - Rooms Qty 250+
Web Conferencing Video Add-on - Rooms Qty 50+
Web Conferencing with Audio - Rooms
Web Conferencing with Audio - Rooms Qty 1000+
Web Conferencing with Audio - Rooms Qty 250+
Web Conferencing with Audio - Rooms Qty 50+
Web Fax Minutes

State

Alabama

Arizona

Arkansas

California

Colorado

Connecticut

Delaware

Florida

Georgia

Hawaii

Iowa

Idaho

Illinois

Indiana

Kansas

Kentucky

Louisiana

Massachusetts

Maryland

Maine

Michigan

Minnesota

Missouri

Mississippi

North Carolina

Nebraska

New Hampshire

New Jersey

New Mexico

Nevada

New York

Ohio

Oklahoma

Oregon

Pennsylvania

Rhode Island

South Carolina

Tennessee

Texas

Utah

Virginia

Vermont

Washington

Wisconsin

West Virginia