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September 9, 2021

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: WC Docket No. 21-344
Supplement to "Joint Application for Transfer of Control of Domestic and
International Authorizations"

Dear Ms. Dortch:

NCTC Holdings, Inc. ("Holdings") and Nedelco, Incorporated ("Nedelco") (collectively the "Parties") hereby file this supplement to the August 31, 2021 submission of the above-referenced Application.

The Parties inadvertently omitted identification of NebraskaLink Holdings, LLC ("NebraskaLink"), a fiber transport provider operating within the states of Colorado, Iowa and Nebraska, as an entity in which each of the Parties hold a greater than 10% interest. Holdings and Nedelco each own 20% of the issued and outstanding membership interests in NebraskaLink. NebraskaLink does not own any interest in NCTC Holdings or Nedelco. In addition, the Parties note that Hamilton NG911, Inc., a wholly owned subsidiary of Nedelco, holds a certificate of public convenience and necessity as a provider of competitive local exchange service in the States of Nebraska, Arizona, California, and Oklahoma, however, these Competitive Local Exchange Carrier ("CLEC") authorities are each inactive. Further, other than the information disclosed in the Application and herein, no other individual or entity associated with Holdings and Nedelco holds a direct or indirect 10% or greater interest in any domestic telecommunications service provider.

The following additional information is provided with respect to Canine Companions Charitable Properties, LLC ("CCCP"), an owner of a greater than 10% interest in Nedelco, and Canine Companions for Independence, Inc. ("CCI"), the parent sole owner of CCCP. CCCP is a California limited liability company organized and operated exclusively to further the charitable purposes of its sole member, CCI, a California nonprofit public benefit corporation. CCI is a

California nonprofit public benefit corporation that “provides service dogs to adults, children and veterans with disabilities and facility dogs to professionals working in healthcare, criminal justice and educational settings. Since [CCI’s] . . . founding in 1975, [CCI] . . . dogs and all follow-up services are provided at no cost to [CCI] . . . clients.” (<https://canine.org/about/who-we-are/>; last visited September 9, 2021).

The following individuals are United States citizens and are members of the Board of Directors of CCI: John McKinney (Chair); Carolyn Hrach;; Steve Boyd (Secretary); Jeannie Schulz (Chair Emeritus); Anne Gittinger (Chair Emeritus); John Miller; Bill White; John Hopen; Bob Street; Barrie Graham; Russ Gurevitch, DVM; Judge Ed Kinkeade; Chris Kittredge; Jill Leverton; Robin Sanchez; Michelle Ludwig; Carolyn Hrach; and Emily Williams. Leslie Hennessy (Treasurer), a Board member, is a citizen of the United States and is a citizen of Canada. Juergen Rottler, a Board member, is a US Citizen and a citizen of Germany. Mel Gottlieb, a Board member, is an Australian citizen.

Further, with respect to the ownership of Nedelco, the following additional information is provided. Mr. John Nelson owns 41.64% of Nelson Investments, LLC, a Nedelco shareholder, and thus derivatively owns approximately a 12% interest in Nedelco. In addition, Mr. Nelson individually owns less than a 3% interest in Nedelco. With respect to Madrona Investments, LLC, also a Nedelco shareholder, the Nelson Family Irrevocable Trust (“NFIT”) owns approximately 79.75% of Madrona Investments, LLC and thus derivatively owns approximately a 26% interest in Nedelco. The beneficiary of NFIT is Elizabeth Nelson Lui, who is a United States citizen.

The counties that comprise of the service area of Nebraska Central Telephone Company (“NCTC”) and Hamilton Telephone Company (“HTC”) are as follows:

NCTC – Portions of Custer, Wheeler, Rock, Loup, Holt, Garfield, Hall, Buffalo, Greeley, Howard, Kearney, Blaine, Valley, Sherman and Adams Counties

HTC – Portions of Hamilton, Hall, Adams, York, Clay and Merrick Counties

There are no adjacent or overlapping service areas between NCTC and HTC in the Counties identified above. Please refer to the attached map for the exchange areas of NCTC and HTC.

The following information is provided with respect to the CLEC and Voice over Internet Protocol (“VoIP”) services provided by Hamilton Long Distance Company (“HLDC”). HLDC provides is CLEC and Voice over Internet Protocol (“VoIP”) services outside of the service area of HTC. HLDC is a registered CLEC in the States of Nebraska and Louisiana but is only providing services to the public in Nebraska at this time. HLDC is registered as a nationwide VoIP provider (including registration with the Commission and a few select states); however, at this time, HLDC is not providing VoIP services to the public outside Nebraska. HLDC provides a “hosted” VoIP service (akin to a “PBX”) allowing its TRS-affiliated company locations in the

states of Massachusetts, Maryland, Georgia, Louisiana, Kansas and Wisconsin to make outbound calls to the Public Switched Telephone Network. Finally, while HLDC has been designated an Eligible Telecommunications Carrier (“ETC”) in areas outside of HTC’s ETC RLEC area, HLDC is offering service as an ETC at this time.

Finally, Hamilton Cobalt, Inc. provides its cable service within the State of Nebraska and to communities to which HTC and HLDC provide their respective services, as well as to communities in the service areas of three other incumbent local exchange carriers – Benkelman Telephone Company, Inc., Hemingford Cooperative Telephone Company, and Henderson Cooperative Telephone Co.

Attached hereto are the Declarations of Andrew D. Jader and John A. Nelson verifying that the information in this supplement is true and accurate to the best of their information and belief.

Please direct any inquiries regarding this matter to the undersigned.

Sincerely,




Thomas J. Moorman
Counsel to NCTC Holdings, Inc. and
Nedelco, Incorporated

Attachments

cc: G. Kwan, Federal Communications Commission (via email)
S. Mukhoty, Federal Communications Commission (via email)
D. Krech, Federal Communications Commission (via email)
A. Jader, NCTC Holdings, Inc.
J. Nelson, Nedelco, Incorporated

DECLARATION

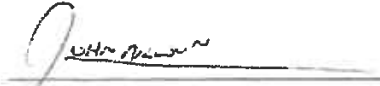
I, Andrew D. Jader, President of NCTC Holdings, Inc. ("Holdings"), do hereby declare under penalties of perjury that I have read the foregoing Supplement and that the information contained therein regarding Holdings referenced in the Supplement is true and accurate to the best of my knowledge, information, and belief.


Andrew D. Jader
President
NCTC Holdings, Inc.

Date: 9-9-2021

DECLARATION

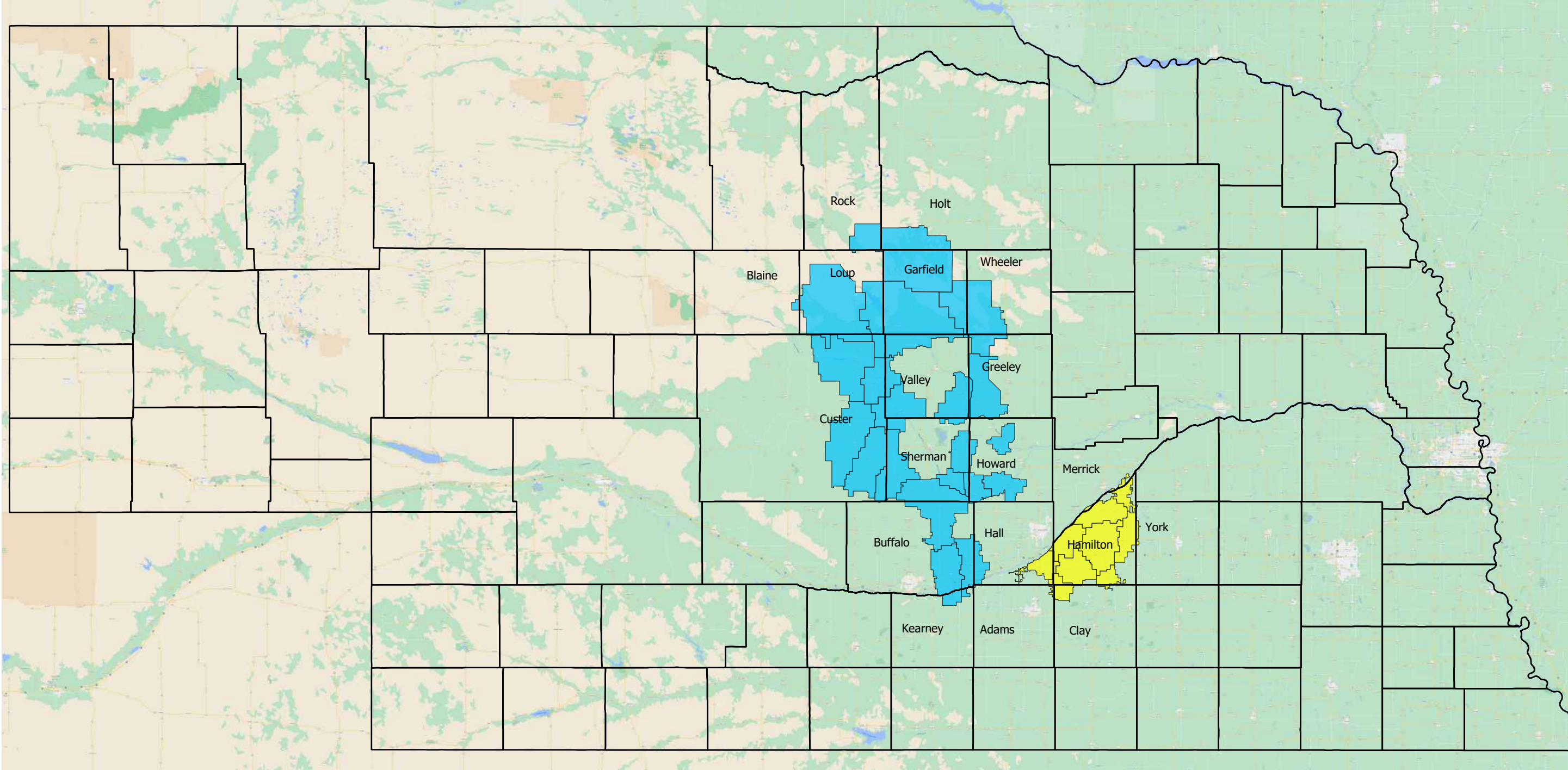
I, John A. Nelson, President and Chief Executive Officer of Nedelco, Incorporated ("Nedelco"), do hereby declare under penalties of perjury that I have read the foregoing Supplement and that the information contained therein regarding Nedelco referenced in the Supplement is true and accurate to the best of my knowledge, information, and belief.



John A. Nelson
President and Chief Executive Officer
Nedelco, Incorporated

Date: 9-9-21

Hamilton and NCTC Exchange Areas



Hamilton Exchange Areas
NCTC Exchange Areas
County Boundaries

