ANSWER TO QUESTION 24

Attachment describing the transaction, demonstrating compliance with the Commission's rules, and explaining how the transaction serves the public interest.

A. Description of the Applicants

Citizens Mutual Telephone Cooperative ("CM Tech") is a cooperative association organized under the laws of Iowa. Its principal place of business is 114 West Jefferson Street, Bloomfield, Iowa 52537. CM Tech is an incumbent local exchange carrier providing local exchange services and exchange access services to customers in the Davis, Wapello, and Van Buren counties of Iowa. CM Tech also provides competitive voice service on a resold basis in Monroe and Appanoose counties. Finally, CM Tech provides internet access and video services throughout its entire service footprint.

CM Tech holds an international Section 214 authorization (ICFS File No. ITC-214-19970219-00096). CM Tech has two wholly owned subsidiaries: Citizens HoCo, Inc., an Iowa corporation formed solely as the merger subsidiary for the Proposed Transaction, whose separate corporate existence will cease upon consummation of the merger; and Citizens Communication Company, an Iowa corporation with no active telecommunications operations. Neither Citizens HoCo, Inc. nor Citizens Communication Company holds international Section 214 authority. CM Tech does not participate in the Commission's Secure and Trusted Communications Networks Reimbursement Program and does not utilize any covered equipment or services.

Pursuant to a management services agreement, CM Tech manages the operations of Farmers Telephone Company, an unaffiliated incumbent local exchange carrier located in Batavia, Iowa; CM Tech holds no equity or board control in Farmers Telephone Company.

Van Buren Telephone Company, Inc. ("VBT") is a corporation organized under the laws of Iowa. Its principal place of business is 617 First Street, Keosauqua, Iowa 52565. VBT has provided local exchange and exchange access services to customers in the communities of Birmingham, Bonaparte, Cantril, Keosauqua, Mount Sterling, and Stockport, Iowa since 1923. VBT holds an international Section 214 authorization to provide resold services (ICFS File No. ITC-214-20080707-00312). VBT has one wholly owned subsidiary, Van Buren Wireless, Inc., an Iowa corporation that holds no FCC licenses and provides no telecommunications services. VBT does not participate in the Commission's Secure and Trusted Communications Networks Reimbursement Program and does not utilize any covered equipment or services.

B. Description of the Proposed Transaction

Pursuant to an Agreement and Plan of Merger dated January 28, 2026, CM Tech will acquire all outstanding shares of stock in VBT through a reverse triangular merger (the "Proposed Transaction"). Citizens HoCo, Inc., an Iowa corporation and direct, wholly owned subsidiary of CM Tech formed solely for purposes of the Proposed Transaction, will merge with and into VBT. The separate corporate existence of Citizens HoCo, Inc. will cease, and VBT will continue as a direct, wholly owned subsidiary of CM Tech. Because VBT survives as the continuing legal entity, this transaction constitutes a transfer of control of VBT's international Section 214 authorization, not an assignment.

C. Public Interest Statement

Grant of this Application will serve the public interest because it (a) will not result in any violation of the Act or any other applicable statutory provision, (b) will not result in a violation of the Commission's rules, (c) will not substantially frustrate or impair the Commission's enforcement of the Act or interfere with the objectives of the Act or any other statute, and (d) will yield affirmative public interest benefits. No waiver is requested in this Application.

The Proposed Transaction is in the public interest because it will (i) facilitate efficiencies in VBT's operations and grant VBT access to the financial resources and operational expertise of CM Tech; (ii) provide VBT's customers access to CM Tech's in-house expertise in regulatory, financial, and managerial matters; and (iii) preserve VBT's identity as a local company serving the communities of Van Buren County, Iowa. Because VBT will remain the surviving corporate entity and will continue to operate under its existing authorizations, VBT's customers will receive uninterrupted service following consummation of the Proposed Transaction.

ANSWER TO QUESTION 25

Ownership listing and diagram pursuant to 47 C.F.R. § 63.18(h).

VBT (Transferor/Authorization Holder): VBT is a privately held Iowa corporation. No individual or entity directly or indirectly owns ten (10) percent or more of the equity interests, voting interests, or a controlling interest in VBT. All shareholders of VBT are U.S. citizens.

CM Tech (Transferee): CM Tech is a member-owned cooperative association organized under the laws of Iowa. As a cooperative, CM Tech is owned by its member-patrons. No individual member or entity directly or indirectly owns ten (10) percent or more of the equity interests, voting interests, or a controlling interest in CM Tech. CM Tech has no foreign ownership.

Following consummation of the Proposed Transaction, CM Tech will own 100 percent of the equity interests of VBT. Neither CM Tech nor VBT has any interlocking directorates with any foreign carriers.

Diagrams depicting the pre- and post-Proposed Transaction ownership structure of VBT are provided in Attachment 2.

ANSWER TO QUESTION 27

Demonstration that the Transferee qualifies for non-dominant classification pursuant to 47 C.F.R. § 63.10.

CM Tech qualifies for non-dominant carrier classification under Section 63.10 of the Commission's rules. CM Tech is not a foreign carrier, is not affiliated with any foreign carrier, and will not become affiliated with any foreign carrier as a result of the Proposed Transaction. Accordingly, the presumption of non-dominance under Section 63.10(a)(1) applies to CM Tech.

VBT likewise qualifies for non-dominant classification. VBT holds an international Section 214 authorization to provide resold services pursuant to Section 63.18(e)(2) of the Commission's rules, and provides international service solely through the resale of an unaffiliated U.S. facilities-based carrier's international switched services. VBT is therefore presumptively classified as non-dominant under Section 63.10(a)(4). VBT is not a foreign carrier, is not affiliated with any foreign carrier, and will not become affiliated with any foreign carrier as a result of the Proposed Transaction.

ANSWER TO QUESTION 29

Statement demonstrating eligibility for streamlined processing pursuant to 47 C.F.R. § 63.12.

The Applicants respectfully request streamlined processing of this Application pursuant to Section 63.12(a)-(b) of the Commission's rules. Section 63.12(c)(1) is inapplicable because neither CM Tech nor VBT is, nor is either affiliated with, any foreign carrier. The Applicants are not affiliated with any dominant U.S. carrier whose international switched or private line services are, or would be, resold by the Applicants. Accordingly, none of the circumstances that would disqualify this Application from streamlined processing under Section 63.12(c) applies.

ANSWER TO QUESTION 30

Information and certifications required by 47 C.F.R. § 63.18(i) through (m).

§ 63.18(i) — Foreign Carrier Certification: Applicants certify that they are not foreign carriers, nor are they affiliated with foreign carriers, and they will not become affiliated with foreign carriers as a result of the Proposed Transaction.

§ 63.18(j) — Destination Country Certification: Applicants certify that they do not seek to provide international telecommunications services to any destination country where:

(1) An Applicant is a foreign carrier in that country; or

(2) An Applicant controls a foreign carrier in that country; or

(3) Any entity that owns more than 25 percent of Applicants, or that controls Applicants, controls a foreign carrier in that country; or

(4) Two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of Applicants and are parties to, or the beneficiaries of, a contractual relation affecting the provision or marketing of international basic telecommunications services in the United States.

§ 63.18(k) — Market Power Demonstration for Non-WTO Countries: Not applicable.

§ 63.18(l) — [Reserved]: Not applicable.

§ 63.18(m) — Regulation as Non-Dominant Provider: Not applicable. As certified under § 63.18(i) above, Applicants are not foreign carriers and are not affiliated with foreign carriers in any destination country.

§ 63.18(n) — Special Concessions: Applicants certify that they have not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route, and they will not enter into such agreements in the future.

§ 63.18(o) — Anti-Drug Abuse Act Certification: Applicants certify that, pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, they are not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.