

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of the Joint Application of	)	
	)	
Traceroad, Inc.	)	
<i>Transferor,</i>	)	
	)	
and	)	WC Docket No. 26-_____
	)	
MuleOps, LLC	)	
<i>Transferee,</i>	)	
	)	
For Consent to Transfer Control of	)	
Smithville Telephone Company, Inc. and Traceroad	)	
Communications, Inc. Pursuant to Section 214	)	
of the Communications Act of 1934, as Amended	)	

To: Chief, Wireline Competition Bureau

**JOINT APPLICATION FOR CONSENT TO TRANSFER CONTROL OF DOMESTIC AND
INTERNATIONAL SECTION 214 AUTHORIZATION**

Traceroad, Inc. (“Traceroad” or “Transferor”), and MuleOps, LLC (“MuleOps” or “Transferee”) (jointly, “Applicants”) hereby respectfully request the Federal Communications Commission’s (“Commission”) consent and authorization, pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214 (the “Act”), and Sections 63.01, 63.04, 63.18, and 63.24 of the Commission’s Rules, 47 C.F.R. §§ 63.01, 63.04, 63.18, and 63.24 to transfer control of Smithville Telephone Company, Inc. (“Smithville”), and Traceroad Communications, Inc. d/b/a Traceroad Long Distance (“TLD”) from Transferor to Transferee (the “Transaction”).

Traceroad wholly owns Smithville and TLD, Mississippi entities that provide telecommunications and information services in northeastern Mississippi with Smithville operating as an incumbent local exchange carrier (“ILEC”) and TLD providing long distance

services. MuleOps is a management and holding company. On March 26, 2026, MuleOps entered into a stock purchase agreement (“Purchase Agreement”) with the stockholders of Traceroad (“Traceroad Stockholders”) whereby MuleOps would purchase all issued and outstanding shares of Traceroad from the Traceroad Stockholders. The Transaction requires Commission approval for the transfer of the domestic and international Section 214 authorizations held by Smithville and TLD.

I. DESCRIPTION OF THE PARTIES

A. MuleOps, LLC (Transferee)

MuleOps is a limited liability company organized under the laws of Idaho and operates as a management company for entities of which Jeremy and Pamela Smith, and Kip and Suzanne Wilson (collectively, “MuleOps Principals”) hold ownership interest and for which they bear management responsibility, including, Direct Communications Cedar Valley operating in Utah and Rico Telephone Company operating in Rico Colorado. Prior to the Transaction, MuleOps does not hold any direct ownership in any of the carriers it manages. The MuleOps Principals are also partial owners of the Direct Management Company, LLC (“DMC”) group of companies, however, MuleOps and its subsidiaries will operate independently of the DMC organization.

B. Traceroad, Inc. (FRN:0024106817)

Traceroad is a telecommunications holding company incorporated in Mississippi. Traceroad serves as the parent entity for a family of affiliated rural telephone carriers operating in the northeastern corner of Mississippi. Through its affiliated carriers, Traceroad oversees the provision of local exchange service, broadband, and telecommunications services to residential and business customers in portions of Itawamba and Monroe Counties, Mississippi. Traceroad is wholly owned by Roger Thompson.

C. Smithville Telephone Company, Inc. (FRN:0004955837)

Smithville is an ILEC incorporated in the State of Mississippi and headquartered at 63470 Highway 25 North, Smithville, Mississippi 38870. Smithville provides local exchange and broadband services in portions of Itawamba and Monroe Counties, Mississippi. Smithville receives Connect America Fund – Intercarrier Compensation (“CAF-ICC”), and Alternative Connect America Cost Model (“ACAM”) support in Study Area Code (“SAC”) 280467. Traceroad is the parent company of Smithville, holding 100 percent equity ownership and voting interest in the ILEC subsidiary.

D. Traceroad Communications, Inc. (FRN:0015957707)

TLD provides interstate and international calling services for customers of Smithville and is located at 63470 Highway 25 North, Smithville, Mississippi. TLD holds international Section 214 authority to provide global resale telecommunications services (FCC File No. ITC- 214-20070213-00072). Traceroad is the parent company of TLD, holding 100 percent equity ownership and voting interest in the long-distance subsidiary.

II. DESCRIPTION OF THE TRANSACTION

On March 26, 2026, the Traceroad Stockholders and MuleOps entered in the Purchase Agreement, whereby, pursuant to the Purchase Agreement and subject to all necessary Commission and state approvals, MuleOps agrees to purchase all issued and outstanding shares of Traceroad.

Following consummation of the Transaction, MuleOps will control Traceroad and its wholly-owned subsidiaries of Smithville and TLD. Smithville and TLD will continue to exist and all current Smithville and TLD customers will continue to receive the same level of service without interruption under MuleOps.

III. UNIVERSAL SERVICE FUND CONSIDERATIONS

On April 19, 2022, the Commission issued a public notice requiring all domestic Section 214 applicants to include specific information in their applications for transactions involving entities that receive USF High-Cost support.¹ In accordance with the public notice, the Applicants provide the following information:

- **A listing of all USF High-Cost support received:**

Entity	State	SAC	Type of Carrier	Support
Smithville	MS	280467	ILEC	CAF-ICC, ACAM

- **Confirmation of whether the entity to be transferred is an ETC:** Smithville is an ETC and maintains its designation from the Mississippi Public Service Commission (“MPSC”).
- **Summary addressing changes to management, technology, or debt:** The Transaction will result in MuleOps acquiring the telecommunications carriers of Smithville and TLD. These companies will continue to exist and there will be no immediate changes to the technologies used. Local management of Smithville and TLD will remain unchanged while MuleOps and its team will assume management at the executive level. MuleOps is not assuming any debt in connection with this transaction.
- **Confirmation of whether the entity being transferred participates in the Lifeline, Emergency Broadband Benefit, or Affordable Connectivity Program:** Smithville

¹ *Wireline Competition Bureau Lists Best Practices for Addressing Universal Service Fund Information in Section 214 Transfer of Control Applications*, Public Notice, DA 22-436 (WCB Apr. 19, 2022).

(SAC 280467) currently participates in the Lifeline program and will continue to do so post-closing of the Transaction.

- **Broadband Data Collection IDs:** The Broadband Data Collection (“BDC”) provider identifier for Smithville is 131363.

IV. PUBLIC INTEREST STATEMENT

Pursuant to Section 214 of the Act, the Commission will approve a proposed transfer of control if it concludes that, after considering the record before it, doing so would serve the public interest, convenience, and necessity.² The Applicants respectfully submit that the Commission should find the proposed Transaction to be in the public interest and approve this Application. The proposed Transaction is part of two transactions MuleOps is conducting within Mississippi and filing with the Commission concurrently.³ The service areas that will be transferred as part of these two transactions are distinct and independent.⁴ By acquiring and operating multiple carriers within the same geographic region, MuleOps will be positioned to realize meaningful economies of scale, allowing it to leverage shared workforce, materials, and operational expertise across its combined Mississippi footprint, thereby lowering costs and ensuring more efficient management of resources. This regional consolidation will also facilitate more effective long-term planning for network investment, broadband deployment, and service enhancements across Mississippi. The Transaction will have no adverse impact on customers of Smithville and TLD, or on vendors or the public, and will not result in any interruption, reduction, loss,

² 47 U.S.C. § 214. *See, e.g., Applications of Level 3 Communications, Inc. and CenturyLink, Inc.*, Memorandum Opinion and Order, WC Docket No. 16-403, FCC 17-142, paras. 8-11 (rel. Oct. 30, 2017) (describing the Commission’s standard of review for proposed transfers of control).

³ *See Joint Application of Sunflower and MuleOps for Consent to Transfer Control of Domestic and International Section 214 Authorizations*, WC Docket No. 26-___. (“Sunflower Application”).

⁴ A map showing Traceroad’s service area as well as the service area being transferred in the Sunflower Application is provided in Exhibit C.

impairment, or disruption of services. The Transaction will therefore serve the public interest because it will not result in any harm to existing customers and will encourage efficient utilization of resources to expand and improve telecommunications and broadband service to communities throughout Mississippi.

**V. INFORMATION REQUIRED BY COMMISSION RULE SECTION 63.04(A)
(DOMESTIC SECTION 214 TRANSFER)**

The Applicants submit the following information pursuant to Section 63.04(a) of the Commission's Rules:

(a)(1) Name, address, and telephone number of each Applicant:

Traceroad, Inc.

Roger Thompson
Owner
63470 Highway 25 North
Smithville, Mississippi 38870
robert@traceroad.net

MuleOps, LLC

Kip A. Wilson
General Manager
PO Box 324
Rockland, ID 83271
Kip@directcomfiber.com

**(a)(2) Government, State, or Territory Under the Laws of Which Each Applicant is
Organized.**

Traceroad, Inc., is a Mississippi corporation. MuleOps, LLC, is an Idaho limited liability company.

(a)(3) Correspondence concerning the Application should be sent to:

Roger Thompson
Owner
63470 Highway 25 North

Smithville, Mississippi 38870
Rogert@traceroad.net
For Traceroad

Kip A. Wilson
General Manager
PO Box 324
Rockland, ID 83271
Kip@directcomfiber.com
For MuleOps

John Kuykendall
JSI, LLC
6404 Ivy Lane, Suite 700
Greenbelt, Maryland 20770
(301) 459.7490
John.Kuykendall@jsitel.com
Regulatory Advisor

(a)(4) Name, address, citizenship, and principal business of entities that own at least ten percent (10%) of the equity of the applicants.

1. Ownership of Traceroad, Inc.

Name and Address	% Equity and Voting Interest	Citizenship	Principal Business
Roger Thompson 13100 River Crest Dr. Little Rock, AR 72212	100%	United States	Telecommunications

Traceroad holds voting and equity interests in the following subsidiaries:

Smithville Telephone Company, Inc. (FRN: 0004955837)

Address: 63470 Highway 25 North, Smithville, Mississippi 38870
Citizenship: Mississippi corporation
Principal Business: Residential and Business Telecommunications
Interest Held: 100%

Traceroad Communications, Inc. (FRN: 0015957707)

Address: 63470 Highway 25 North, Smithville, Mississippi 38870
Citizenship: Mississippi corporation
Principal Business: Long Distance Telecommunications Resale
Interest Held: 100%

2. Ownership of MuleOps, LLC

Name and Address	% Equity and Voting Interest	Citizenship	Principal Business
Jeremy & Pamela Smith PO Box 324, Rockland, ID 83271	50%	United States	Telecommunications
Kip & Suzanne Wilson PO Box 324, Rockland, ID 83271	50%	United States	Telecommunications

No other individual or entity, directly or indirectly, holds 10% or more equity or voting interest in MuleOps. MuleOps does not hold any voting or equity interest in any entities. The MuleOps Principals hold interest in the following entity:

Direct Management Company, LLC

Address: 150 S. Main Street, P.O. Box 269, Rockland, ID 83271

Citizenship: Idaho Limited Liability Company

Principal Business: Telecommunications

Interest Held: 37% direct equity and voting interest (Jeremy and Pamela Smith - 18.5%; Kip & Suzanne Wilson – 18.5%)

Direct Management Company, LLC holds direct or indirect voting and equity interest in the following telecommunications entities:

Name and Address	% Equity and Voting Interest	Citizenship	Carrier Type
Direct Communications Rockland, Inc. 150 S. Main Street, P.O. Box 68, Rockland, ID 83271	100% Direct	Idaho Corporation	ILEC
Star Telephone Company, Inc 77420 Landry Drive, Maringouin, LA 70757	100% Indirect	Louisiana Corporation	ILEC
UniTel, Inc. 129 Main Street, P.O. Box 165, Unity, ME 04988	100% Indirect	Maine Corporation	ILEC
Union River Telephone 126 Old Airline Road, P.O. Box 100, Aurora, ME 04408	100% Indirect	Maine Corporation	ILEC
Direct Communications Cedar Valley, LLC 3726 E. Campus Drive, Suite A, Eagle Mountain, UT 84005	37.5% Direct	Utah Limited Liability Company	ILEC

Rico Telephone Company 17 S. Glasgow Avenue, Rico, CO 81332	37.5% Indirect	Colorado Corporation	ILEC
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Direct Communications Rockland, Inc., holds direct or indirect voting and equity interest in the following telecommunications entities:

Name and Address	% Equity and Voting Interest	Citizenship	Carrier Type
Direct Communications Cedar Valley, LLC 3726 E. Campus Drive, Suite A, Eagle Mountain, UT 84005	62.5% Direct	Utah Limited Liability Company	ILEC
Rico Telephone Company 17 S. Glasgow Avenue, Rico, CO 81332	62.5% Indirect	Colorado Corporation	ILEC

MuleOps and its subsidiaries will operate independently of the DMC organizational structure. Neither MuleOps nor its affiliates hold any interlocking directorates with any foreign carriers.

(a)(5) Certification Pursuant to 47 C.F.R. §§ 1.2001 through 1.2003.

Applicants certify pursuant to §§1.2001 through 1.2003 that no party to this Application is subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.⁵

⁵ See 21 U.S.C. 853.

(a)(6) Description of the Transaction.

The proposed Transaction is described in Section II of this Application.

(a)(7) Description of the Geographic Service Area and Services in Each Area.

The geographic service area is Study Area Codes 280467. The service areas are described in sections I and III of this application and are shown in Exhibit C.

(a)(8) Presumption of Non-Dominance and Qualification for Streamlining.

This Application is not eligible for streamlined processing of a domestic transfer of control application pursuant to Section 63.03(b) of the Commission's Rules. For the reasons stated in Section IV, and because the Transaction presents no competitive concerns, involves no foreign ownership, results in no change in service terms or conditions for customers, and will be managed by an experienced rural telecommunications operator, the Applicants respectfully request that the Commission grant expeditious treatment of this Application.

(a)(9) Other Pending Applications Concerning the Proposed Transaction.

Concurrently with this Application, the Applicants have filed an application for transfer of control of TLD's international Section 214 authorization (FCC File No. ITC- 214-20070213-00072) with the Commission's Office of International Affairs through the International Communications Filing System (ICFS).

(a)(10) Special Considerations.

None.

(a)(11) Waiver Requests.

None.

(a)(12) Public Interest Statement.

The proposed transaction is consistent with and conducive to the public interest for the reasons detailed in Section IV of this Application.

VI. INFORMATION REQUIRED BY COMMISSION RULE SECTION 63.18 (INTERNATIONAL SECTION 214 TRANSFER)

A. Name, address, and telephone number of each applicant (63.18(a))

The applicants are described in Sections I and V.

B. Jurisdiction of Organizations (63.18(b))

The applicant's jurisdictions are described in Section V.

C. Contact Information (63.18(c))

Contact information for the applicants is provided in Section V.

D. Statements of Section 214 Authority (63.18(d))

As discussed above, TLD holds international Section 214 authority to provide global resale telecommunications services (FCC File No. ITC-214-20070213-00072). Neither party holds any other international 214 authority other than what is listed in this Application.

E. Post-Closing Ownership for Transferee (63.18(h))

Post-closing ownership information is listed in Section V and diagramed in Exhibit B.

F. Transferee Certifications (63.18(i)-(q))

Certifications pursuant to 47 C.F.R. § 63.18 (i)-(q) are provided in Exhibit D.

G. Request and Qualification for Streamlined Processing (63.18(r))

Applicants respectfully request streamlined processing of the international Section 214 assignment portion of the Application pursuant to Section 63.12 of the Commission's Rules. This Application qualifies for streamlined processing because: (1) neither Assignor nor Assignee is, or is affiliated with, a foreign carrier; (2) the Application does not seek to provide service to any destination country for which the conditions specified in 47 C.F.R. § 63.18(j)(1)-(4) apply;

and (3) neither Assignor nor Assignee has agreed to accept special concessions from any foreign carrier. Accordingly, the Application does not fall within any of the exclusions from streamlined processing set forth in Section 63.12(c) of the Commission's Rules and streamlined processing should be granted.

VII. CONCLUSION

Based on the foregoing, the Applicants respectfully submit that the public interest, convenience, and necessity would be furthered by the grant of this Application.

Respectfully Submitted,

**Traceroad, Inc. &
MuleOps, LLC.**

By: /s/ Roger Thompson
Roger Thompson
Owner
Traceroad, Inc.
63470 Highway 25 North
Smithville, Mississippi 38870
Rogert@traceroad.net

/s/ Kip A. Wilson
Kip A. Wilson
General Manager
MuleOps, LLC
PO Box 324
Rockland, ID 83271
Kip@directcomfiber.com

Exhibit A
Pre-Transaction Ownership and Organization Information

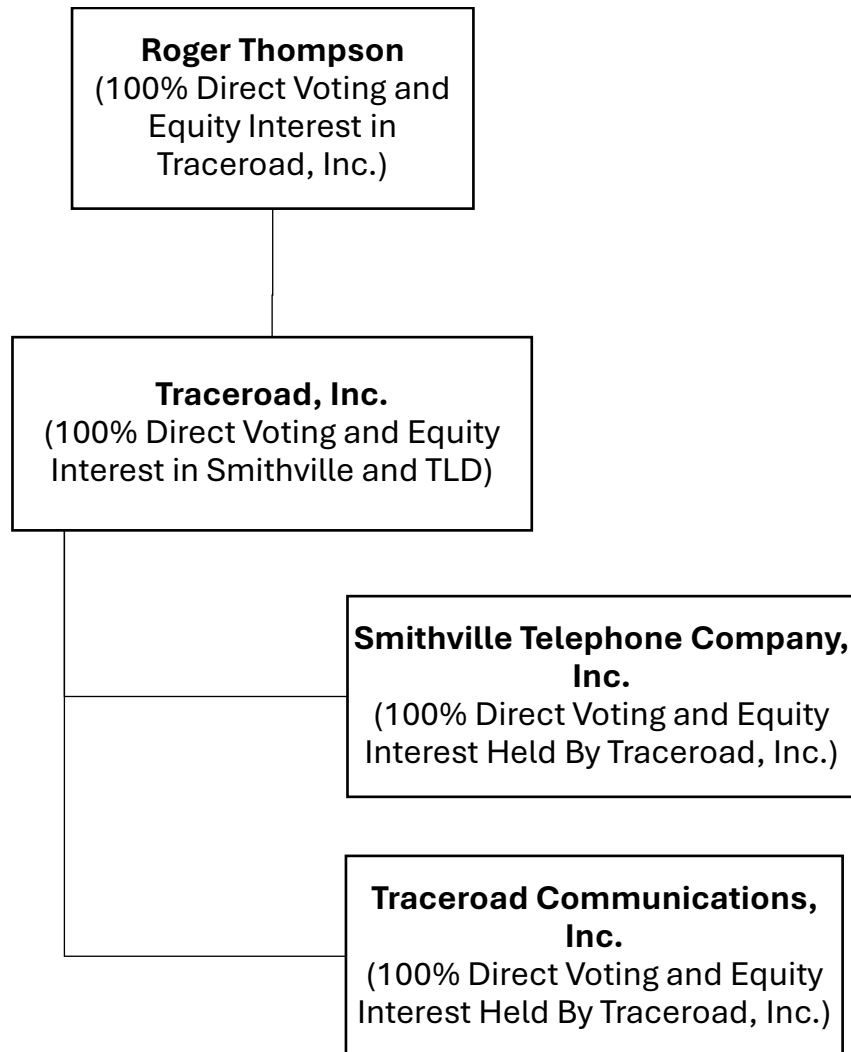


Exhibit B
Post-Transaction Ownership and Organization Information

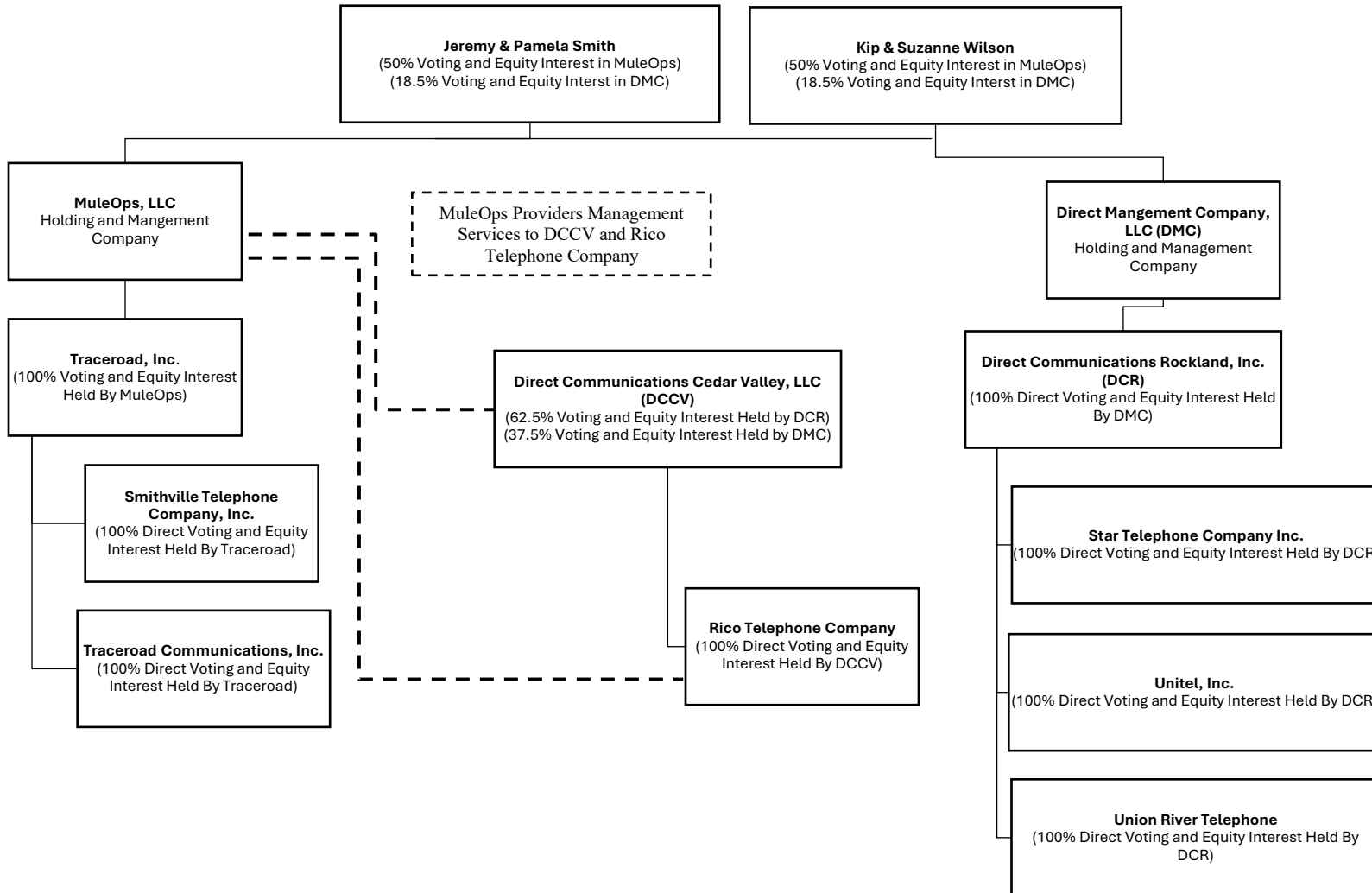


Exhibit C

Map of Smithville's Service Area and the Service Area Being Transferred in the Sunflower Application

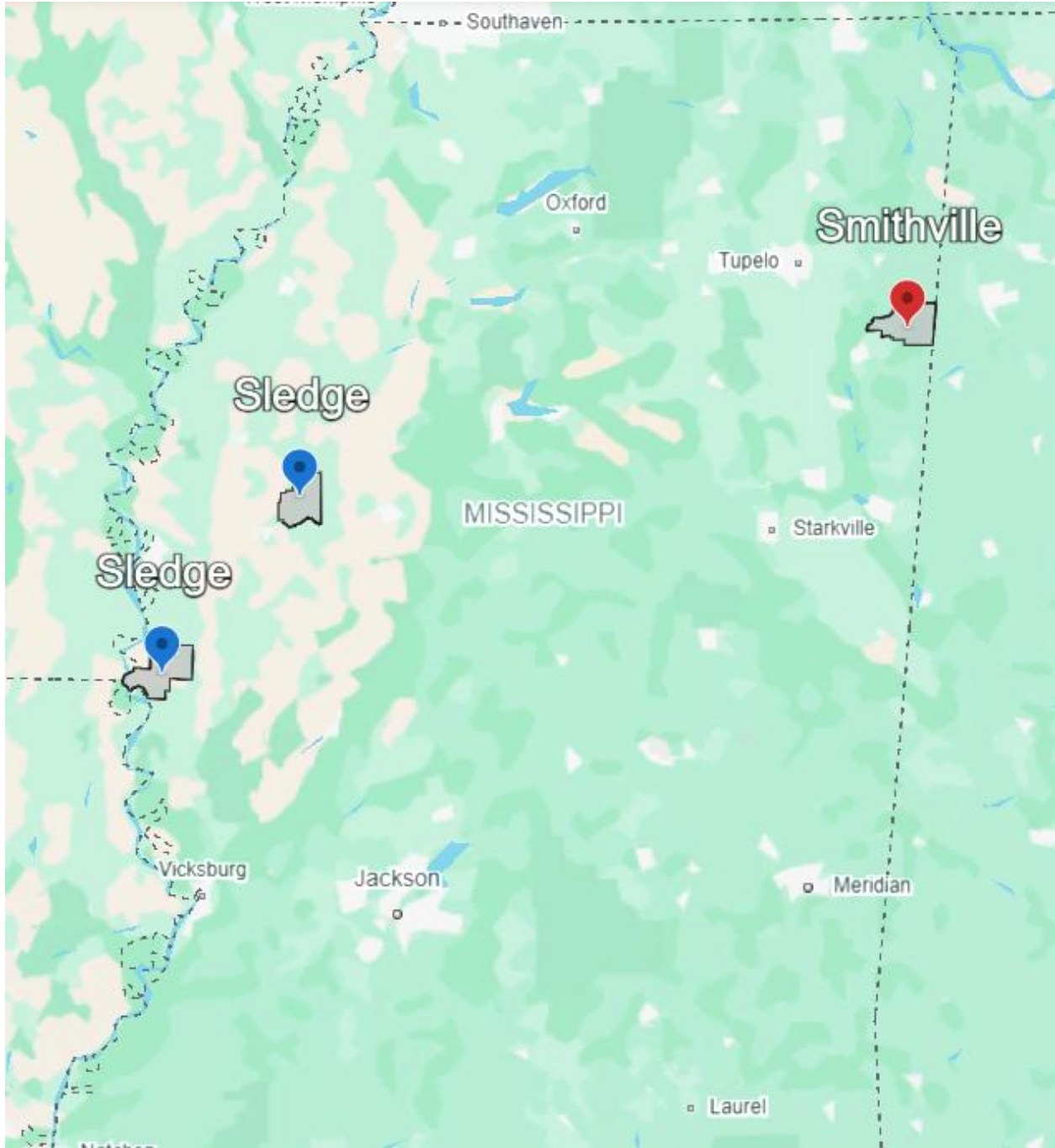


Exhibit D
International 214 Certifications

I, Kip Wilson, as General Manager of MuleOps, LLC (“MuleOps”), hereby make the following certifications and agreements pursuant to 47 C.F.R. § 63.18 (i)-(q):

- i. MuleOps certifies that it is not a foreign carrier and is not affiliated with a foreign carrier.
- ii. MuleOps certifies that it does not seek to provide international telecommunications services to any destination country for which any of the conditions specified in 47 C.F.R. § 63.18(j)(1)-(4) apply.
- iii. MuleOps certifies that it has 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 MuleOps agrees that it will not enter into any such agreements in the future.
- iv. MuleOps certifies, pursuant to §§ 1.2001 through 1.2003 of the Commission's rules, that no party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853a.
- v. MuleOps certifies that no individual or entity that is not a U.S. citizen holds a ten percent or greater direct or indirect equity or voting interest, or a controlling interest, in MuleOps.
- vi. To comply with all applicable Communications Assistance for Law Enforcement Act (CALEA) requirements and related rules and regulations, including any and all FCC orders and opinions governing the application of CALEA, pursuant to the Communications Assistance for Law Enforcement Act and the Commission's rules and regulations in Title 47, chapter I, part 1, subpart Z;
- vii. To make communications to, from, or within the United States, as well as records thereof, available in a form and location that permits them to be subject to a valid and lawful request or legal process in accordance with U.S. law, including but not limited to:
 - The Wiretap Act, 18 U.S.C. § 2510 et seq.;
 - The Stored Communications Act, 18 U.S.C. § 2701 et seq.;
 - The Pen Register and Trap and Trace Statute, 18 U.S.C. § 3121 et seq.; and
 - Other court orders, subpoenas or other legal process;

- viii. To designate a point of contact who is located in the United States and is a U.S. citizen or lawful U.S. permanent resident, for the execution of lawful requests and as an agent for legal service of process;
- ix. That MuleOps is responsible for the continuing accuracy and completeness of all information submitted, whether at the time of submission of the application or subsequently in response to either the Commission or the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector's ("Committee") request, as required under section 1.65(a) of the Commission's rules, and to inform the Commission and the Committee of any substantial and significant changes while an application is pending;
- x. That after the application is no longer pending for purposes of section 1.65 of the Commission's rules, MuleOps will notify the Commission and the Committee of any changes in the authorization holder or licensee information and/or contact information promptly, and in any event within thirty (30) days; and
- xi. That MuleOps understands that if it fails to fulfill any of the conditions and obligations set forth in the certifications set out in section 63.18(q) of the Commission's rules or in the grant of an application or authorization and/or that if the information provided to the United States Government is materially false, fictitious, or fraudulent, it may be subject to all remedies available to the United States Government, including but not limited to revocation and/or termination of the Commission's authorization or license, and criminal and civil penalties, including penalties under 18 U.S.C. § 1001.

/s/ Kip A. Wilson
Kip A. Wilson
General Manager
MuleOps, LLC

VERIFICATION

I, Kip Wilson, General Manager of MuleOps, LLC (“MuleOps”), am authorized to make this Verification on behalf of MuleOps; that the foregoing application was prepared under my direction and supervision; and that the contents 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 3rd Day of June, 2026.

/s/ Kip A. Wilson
Kip A. Wilson
General Manager
MuleOps, LLC

VERIFICATION

I, Roger Thompson, Owner of Traceroad, Inc. (“Traceroad”) am authorized to make this Verification on behalf of Traceroad; that the foregoing application was prepared under my direction and supervision; and that the contents 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 3rd Day of June, 2026.

/s/ Roger Thompson
Roger Thompson
Owner
Traceroad, Inc.