

ATTACHMENT 29

Citizens Telecommunication Technologies Inc., and Omni Fiber, LLC Streamlined Processing Justification

QUESTION 29: The Applicant has uploaded an attachment that includes a statement of how the application qualifies for streamlined processing under section 63.12 of the Commission's rules.

Applicant Answer:

The Applicants respectfully request that this application for consent to the transfer of control of Citizens Telecommunication Technologies, Inc. (hereafter “**Transferor**”) international Section 214 authorization ITC-214-19980828-00592 to Omni Fiber, LLC (hereafter “**Transferee**”) be granted under the streamlined processing procedures set forth in Section 63.12 of the Commission’s rules. *See* 47 C.F.R. § 63.12. This application qualifies for streamlined processing treatment because none of the circumstances that render an application ineligible for streamlined processing under Section 63.12(c) are present here:

1. **No foreign-carrier affiliation in any destination market (§ 63.12(c)(1)).** Neither the Transferor, the Transferee, nor any party to this application is, or is affiliated with, a foreign carrier in any destination market, and the Transferee does not seek authority to provide service to any destination in which it or any affiliate is a foreign carrier or has an affiliation with a foreign carrier.
2. **No affiliation with a dominant U.S. carrier whose services are being resold (§ 63.12(c)(2)).** The Transferee is not affiliated with a carrier whose international switched or private line services it would seek authority to resell, and no party seeks authority to provide international switched basic services subject to the resale conditions that would defeat streamlined treatment.
3. **No reportable foreign ownership (§ 63.12(c)(3)).** No person or entity that is not a U.S. Citizen holds, directly or indirectly, a ten percent (10%) or greater equity or voting interest, or a controlling interest, in the Transferee. The Transferee is a domestic U.S. entity with no reportable foreign ownership.

Because the transfer involves the acquisition of an existing, fully authorized Section 214 holder by a domestic U.S. entity with no reportable foreign ownership, and because none of the Section 63.12(c) exclusions apply, the Applicants submit that this application is eligible for streamlined processing and may be granted on the fifteenth (15th) day after the Commission’s public notice listing it as accepted for filing, with consummation authorized on the fifteenth day thereafter pursuant to Section 63.12(a)-(b).