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

In the Matter of	)	
	)	
M. Todd Wood, acting as the authorized representative of the shareholders of Arkansas Telephone Company, Inc.	)	
Transferor	)	
	)	
Arkansas Telephone Company, Inc.	)	
Licensee	)	**WC Docket No. _______**
	)	
And,	)	
	)	
Spectracomm, Inc.	)	
Transferee	)	
	)	
Application for Consent to Transfer Control of Arkansas Telephone Company, Inc. Pursuant to Section 214 of the Communications Act of 1934, as Amended	)	

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

M. Todd Wood ("**Transferor**" or "**Seller Representative**"), acting in his capacity as the authorized shareholders' representative of the shareholders of Arkansas Telephone Company, Inc. ("**Artelco Shareholders**"), Arkansas Telephone Company, Inc. ("**Licensee**" or "**Artelco**"), and Spectracomm, Inc. ("**Spectracomm**" or "**Transferee**" and collectively with Transferor, Artelco Shareholders, and Artelco, "**Applicants**") hereby respectfully request authority pursuant to Section 214 of the Communications Act of 1934, as amended (the "**Act**"), 47 U.S.C. §214, and Section 63.04, 63.18 and 63.24 of the Commission's Rules[1], to transfer control of Artelco to

[1] 47 C.F.R. §§ 63.04, 63.18, and 63.24.

Spectracomm. Artelco, a rural Incumbent Local Exchange Carrier in Arkansas, holds an international Section 214 license (ITC-214-20010209-00087) granted on March 14, 2001 and holds blanket domestic Section 214 authorization pursuant to Section 63.01 of the Commission's rules. Pursuant to Section 63.04(b) of the Commission's rules, this Joint Application is being filed concurrently with the Wireline Competition Bureau and International Bureau.

In support of the Joint Application, the Applicants provide the following information:

I. DESCRIPTION OF THE APPLICANTS

A. The Shareholders of Arkansas Telephone Company, Inc.

Licensee Artelco is owned directly by a group of Artelco Shareholders comprised of certain individuals and partnerships (as described in detail below) that collectively hold all of the outstanding shares of Artelco. No single Artelco Shareholder owns or controls a majority interest in Artelco. Instead, for the purposes of the transaction described herein, the Artelco Shareholders are represented by M. Todd Wood, who is authorized to represent and act on behalf of the Artelco Shareholders.

The primary Artelco Shareholders are the W.H. McCaslin Family Limited Partnership ("**McCaslin Family Partnership**"); Joann M. Whiteman Family Limited Partnership ("**Whiteman Family Partnership**"); McCaslin-Wood Family Partnership ("**Wood Family Partnership**"); and C.D. Limited Partnership ("**C.D. Partnership**"). None of the Artelco Shareholders is a foreign carrier, and none of the Artelco Shareholders is affiliated with any foreign carriers. None of the Artelco Shareholders holds a reportable[2] ownership interest in any other company or entity holding any license in any jurisdiction.

[2] No Artelco Shareholders hold direct or indirect interests in excess of 10% in any U.S. licensed carrier.

B. Arkansas Telephone Company, Inc.

Arkansas Telephone Company, Inc. is a corporation organized under the laws of the State of Arkansas. Its principal place of business is 128 Church Street, Clinton, Arkansas 72031. Artelco holds blanket domestic Section 214 authority. Artelco is not a foreign carrier and is not affiliated with any foreign carriers. Artelco's BDC filer identification is 802047. Artelco holds an international Section 214 license (ITC-214-20010209-00087) granted on March 14, 2001 ("**International 214**"). Artelco's primary service area is in Van Buren, Cleburne, Stone, Searcy, Pope and Conway Counties in Arkansas. Artelco holds a Certificate of Convenience and Necessity to operate as an Incumbent Local Exchange Carrier from the Arkansas Public Service Commission, issued in Docket Nos. U-1008 and U-1142 (Company #127).[3] Artelco also holds a designation as an Eligible Telecommunications Carrier ("**ETC**") pursuant to an ETC Designation Order issued by the Arkansas Public Service Commission.[4]

C. Spectracomm, Inc.

Spectracomm, Inc. is a corporation organized in the State of Arkansas with a primary business address at Post Office Box 699, 205 East 7th Street, Danville, AR 72833. Spectracomm is a holding company that holds 100% of the equity interest in Arkwest Communications, Inc. ("**Arkwest**").[5] Arkwest is a corporation organized under the laws of the State of Arkansas with a principal place of business of P.O. Box 699, 205 East 7th Street, Danville, Arkansas 72833. Arkwest's primary service area is in the Arkansas Counties of Yell, Scott, and Perry. Arkwest holds a Certificate of Convenience and Necessity (dated 4/25/1940) with the Arkansas Public

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3 The Arkansas Public Service Commission granted Artelco authority to supply local and toll telephone services to areas located in Van Buren County, comprised of the towns of Clinton and Shirley, and adjacent rural areas, in Docket U-1008 and additional areas in Van Buren and Cleburne Counties in Docket U-1142.

4 In the Matter of Determining Eligible Telecommunications Carriers in Arkansas, Docket No. 97-236-U, Order No. 2 (Issued November 7, 1997).

5 Spectracomm has a pending Joint Application before the FCC seeking approval for a Section 214 transfer of control over Magazine Telephone Company, Inc. See Docket WC26-150 and ITC-T/C-20260612-00168.

Service Commission Telephone Division – License to operate as an Incumbent Local Exchange Carrier (Company #135). Arkwest also holds a designation as an ETC in Arkansas pursuant to Docket No. 97-326-U (dated 11/7/1997). Spectracomm is a wholly owned subsidiary of Fiber Acquisition Operations Arkansas, LLC, ("**Fiber Acquisition**") a corporation organized in the State of Delaware with a primary business address at 627 Olin Hills Road, Farmerville, LA 71241. It is a wholly owned subsidiary of Fiber Acquisition Operations, LLC dba PhireLink ("**PhireLink**"). PhireLink owns Rebeltec Communications, LLC ("**Rebeltec**"), which provides high-speed fixed wireless and fiber-based broadband internet service to residential and business customers in Southeastern Colorado and Western Kansas. PhireLink also owns Camellia City Fiber, LLC ("**Camellia**"), which provides high-speed fiber-based broadband internet services to residential and business customers in St. Tammany Parish, Louisiana and Tammany Wireless Holdings, LLC ("**Tammany Wireless**"), which provides high-speed fixed wireless broadband internet services to residential and business customers in St. Tammany Parish, Louisiana. Spectracomm is thereby affiliated with Rebeltec, Camellia, and Tammany Wireless through common ownership. Spectracomm is not a foreign carrier and is not affiliated with any foreign carriers. Rebeltec, Camellia, and Tammany Wireless do not receive USF high cost support.

The following affiliates of the Transferee provide broadband services equal to or exceeding 100/20 Mbps:

Arkwest Communications, Inc

Rebeltec Communications, LLC

Camellia City Fiber, LLC

Tammany Wireless Holdings, LLC

Except for those entities, there are no other entities being acquired or that are currently affiliated with the Transferee that provide broadband service equal to or exceeding 100/20 Mbps.[6]

II. DESCRIPTION OF THE TRANSACTION

Pursuant to the terms of a Stock Purchase Agreement ("**Agreement**") dated July 16, 2026, by and among Artelco, McClint-Ark Internet, Inc. ("**MCA**")[7], Artelco Shareholders, the shareholders of MCA ("**MCA Shareholders**"), Spectracomm, and Seller Representative, Spectracomm will acquire all of the outstanding stock of Artelco (the "**Transaction**"). As a result of the proposed Transaction, full ownership and control of Artelco will be transferred to Spectracomm. Once the proposed Transaction is closed, neither Transferor nor any of the Artelco Shareholders will hold any ongoing ownership interests in or control over Artelco. Additionally, through the proposed Transaction, the MCA Shareholders will transfer all of the shares of MCA, an Arkansas corporation affiliated with Artelco, that provides broadband internet services to residential and business customers in Van Buren, Cleburne, Stone, Searcy, Pope, and Conway Counties in Arkansas.

The proposed Transaction will be transparent to Artelco's customers in terms of the services that those customers receive. In particular, the proposed Transaction will not affect the rates, terms, and conditions under which Artelco's current customers receive service, and will not directly result in the discontinuance of service to any of Artelco's customers.

As the proposed Transaction is limited to a change in ownership of Artelco, immediately following the Transaction, Artelco will continue to operate pursuant to its existing blanket

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6 Magazine Telephone Company, Inc also provides broadband services equal to or exceeding 100/20 Mbps. Please note the pending application described in Footnote 5.

7 MCA is a provider of Internet services that does not hold any FCC issued licenses.

domestic Section 214 authorization and its International 214 without change. The operations of Artelco will not be directly affected by the proposed Transaction. An illustrative chart showing the current corporate structure of Applicants is attached as **Exhibit A**, and Applicants' corporate structure as it would exist after the closing of the proposed Transaction is attached as **Exhibit B**.

III. INFORMATION REQUIRED BY SECTION 63.04(A) OF THE COMMISSION'S RULES

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

(1) The name, address, and telephone number of each applicant.

Transferor:
M. Todd Wood as shareholders' representative of the Artelco Shareholders
Post Office Box 707
Springdale, Arkansas 72765
Tel: (479) 601-4910
Fax: (479) 872-2101

Licensee:
Arkansas Telephone Company, Inc.
Post Office Box 69128 Church Street
Clinton, Arkansas 72031
Tel: (501) 745-2114
Fax: (501) 745-5551
FRN: 0003732302

Transferee:
Spectracomm, Inc.
Post Office Box 699
205 East 7th Street
Danville, AR 72833
Tel: (479) 495-4200
Fax: (479) 495-4249
FRN:0007751621

(2) The government, state, or territory under the laws of which each corporate or partnership applicant is organized.

Mr. Wood is an individual/natural person, residing in the State of Arkansas.

Artelco and Spectacomm are corporations formed under the laws of the State of Arkansas.

By way of additional disclosure with respect to the Artelco Shareholders, the McCaslin Family Partnership, the Whiteman Family Partnership and the C.D. Partnership are Arkansas limited partnerships. The McCaslin-Wood Partnership is an Arkansas partnership.

(3) The name, title, post office address, and telephone number of the officer or contact point, such as legal counsel, to whom correspondence concerning the application is to be addressed.

For questions concerning this Application:

Brian McDermott
Edward S. Quill, Jr.
Strategies Law Group, PLLC
1002 Parker Street
Falls Church, Virginia 22046
Tel: (571) 730-4970
bmcdermott@stratlg.com
equill@stratlg.com

For Transferor:

M. Todd Wood
P.O. Box 707
Springdale, Arkansas 72765
Tel: 479-601-4910
Email: todd.wood@sbcglobal.net

With copy to:

Scott M. Lar
Quattlebaum, Grooms & Tull PLLC
4100 Corporate Center Drive, Ste. 310
Springdale, Arkansas 72762
Tel: (479) 444-5200
E-mail: slar@qgtlaw.com

For Licensee:

Arkansas Telephone Company, Inc.
Post Office Box 69
128 Church Street

Clinton, Arkansas 72031
Attn: Randy McCaslin
Tel: (501) 745-2114
Email: randymcc@artelco.com

With copy to:

Scott M. Lar
Quattlebaum, Grooms & Tull PLLC
4100 Corporate Center Drive, Ste. 310
Springdale, Arkansas 72762
Tel: (479) 444-5200
E-mail: slar@qgtlaw.com

For Transferee:

Spectracomm, Inc.
P.O. Box 699
205 E. 7th Street
Danville, AR 72833
Attn: Matthew Debnam
Tel: (479) 495-4200
Email: mdebnam@phirelink.com

(4) The name, address, citizenship, and principal business of any person or entity that directly or indirectly owns at least ten (10) percent of the equity of the applicant, and the percentage of equity owned by each of those entities (to the nearest one (1) percent).

Current Ownership of Artelco

The following entities currently directly own a ten percent (10%) or greater share of Artelco:

Name:	W.H. McCaslin Family Limited Partnership
Address:	P.O. Box 69, Clinton, Arkansas 72031
Ownership Interest:	25% equity and voting interest directly in Artelco
Citizenship:	U.S. (Arkansas Limited Partnership)
Principal Business:	Holding Company

Name:	Joann M. Whiteman Family Limited Partnership
Address:	2362 E. Camelot Place, Fayetteville, AR 72701
Ownership Interest:	23.6% equity and voting interest directly in Artelco
Citizenship:	U.S. (Arkansas Limited Partnership)
Principal Business:	Holding Company

Name:	McCaslin-Wood Family Partnership
Address:	3474 E. Natchez Trace, Fayetteville, AR 72703
Ownership Interest:	23.52% equity and voting interest directly in Artelco
Citizenship:	U.S. (Arkansas Partnership)
Principal Business:	Holding Company

Name:	C.D. Limited Partnership
Address:	3090 Valerie Drive, Fayetteville, AR 72703
Ownership Interest:	25.0% equity and voting interest directly in Artelco
Citizenship:	U.S. (Arkansas Limited Partnership)
Principal Business:	Holding Company

Prior to the closing of the Transaction described in the Application, the following entities indirectly own a ten percent (10%) or greater share of Artelco through their ownership of LA Holdings:

Name:	Judy F. Wood
Address:	3474 E. Natchez Trace, Fayetteville, AR 72703
Ownership Interest:	15.54% indirect equity and voting interest through 66.08% interest in Wood Family Partnership.
Citizenship:	U.S.
Principal Business:	Individual

No other entity of individual holds an ownership or voting interest of ten percent (10%) in Artelco prior to closing the Transaction.

[8]

Post-Closing Ownership of Artelco

Following the closing of the Transaction described in the Application, the following entity will directly own a ten percent (10%) or greater share of Artelco:

Name:	Spectracomm, Inc. (FRN-0007751621)
Address:	Post Office Box 699, Danville, AR 72833
Ownership Interest:	100% equity and voting interest directly in Magtel.
Citizenship:	U.S. (Arkansas Corporation)
Principal Business:	Holding Company

Following the closing of the Transaction described in the Application, the following entities will indirectly own a ten percent (10%) or greater share of Artelco through their ownership of Spectracomm

Name:	Fiber Acquisition Operations Arkansas, LLC (FRN-0036432284)
Address:	627 Olin Hills Road, Farmerville, LA 71241
Ownership Interest:	100% equity and voting interest indirectly through ownership in Artelco.
Citizenship:	U.S. (Delaware Corporation)
Principal Business:	Holding Company

Following the closing of the Transaction described in the Application, the following entity will indirectly own a ten percent (10%) or greater share of Artelco through its ownership of Fiber Acquisition:

Name:	Fiber Acquisition Operations, LLC dba PhireLink (FRN-0034953497)
Address:	627 Olin Hills Road, Farmerville, LA 71241
Ownership Interest:	100% equity and voting interest indirectly through ownership in Fiber Acquisition.
Citizenship:	U.S. (Delaware Corporation)
Principal Business:	Telecommunications

Following the closing of the Transaction described in the Application, the following entity will indirectly own a ten percent (10%) or greater share of Artelco through its ownership of PhireLink:

Name:	Fiber Acquisition Holdings, LLC ("**Fiber Holdings**")
Address:	627 Olin Hills Road, Farmerville, LA 71241
Ownership Interest:	89% equity and voting interest indirectly through ownership in PhireLink.
Citizenship:	U.S. (Delaware Corporation)
Principal Business:	Holding Company

Following the closing of the Transaction described in the Application, the following entities will indirectly own a ten percent (10%) or greater share of Artelco through their ownership of Fiber Holdings:

Name:	LA Broadband Holdings Limited Partnership ("**LA Holdings**")
Address:	627 Olin Hills Road, Farmerville, LA 71241
Ownership Interest:	43% equity and voting interest indirectly through 48% interest in Fiber Holdings.

Citizenship:	U.S. (Delaware LP)
Principal Business:	Holding Company

Name:	AC Fiber LLC ("AC Fiber")
Address:	627 Olin Hills Road, Farmerville, LA 71241
Ownership Interest:	43% equity and voting interest indirectly through 48% interest in Fiber Holdings.
Citizenship:	U.S. (Delaware LP)
Principal Business:	Holding Company

Following the closing of the Transaction described in the Application, the following entities will indirectly own a ten percent (10%) or greater share of Artelco through their ownership of LA Holdings:

Name:	Glen F. Post
Address:	198 Naomi Drive, Farmerville, LA 71241
Ownership Interest:	22% indirect equity and voting interest through 50% interest in LA Holdings.[9]
Citizenship:	U.S.
Principal Business:	Individual

Name:	James Davidson
Address:	222 Loblolly Lane, Choudrant, LA 71227
Ownership Interest:	16% indirect equity and voting interest through 39% interest in LA Holdings.
Citizenship:	U.S.
Principal Business:	Individual

Following the closing of the Transaction described in the Application, the following entity will indirectly own a ten percent (10%) or greater share of Artelco through his ownership of AC Fiber:

Name:	Benjamin A. Friedman
Address:	411 S. Woodward Ave., Birmingham, MI 48009
Ownership Interest:	43% indirect equity and voting interest through 100% interest in AC Fiber, LLC[10]

[9] GP3 Holdings, LLC (which is wholly owned by Glen Post) owns 4% of Fiber Holdings and 3% of PhireLink and thereby would hold an indirect 7% interest in Artelco. Glen Post would also derive an indirect ownership interest of 22% in Artelco by virtue of holding 50% of the ownership of LA Holdings, which in turn would be an indirect 43% owner of Artelco. Accordingly, Glen Post would hold a combined indirect interest of 28% in Artelco.

[10] The Avery Companies, LLC (which is wholly owned by Ben Friedman) owns 3% of PhireLink and thereby would hold an indirect 3% interest in Artelco. Ben Friedman also would derive an indirect ownership interest of 43% in Artelco through his 100% of the ownership of AC Fiber, LLC, which in turn is an indirect 43% owner of Artelco. Accordingly, Ben Friedman will hold a combined indirect interest of 46% in Artelco.

Citizenship: U.S.
Principal Business: Individual

The Applicants confirm that, other than as disclosed within this Application, none of the upstream entities or individuals above Fiber Acquisition in the ownership structure of Spectracomm hold a ten percent (10%) or greater ownership interest, either directly or indirectly, in any other licensed entities that provide regulated voice services.

(5) Certification pursuant to §§ 1.2001 through 1.2003 of this chapter that no party to the application is subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988. *See* 21 U.S.C. 853.

Applicants attest 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.

(6) A description of the transaction.

See Description of Transaction in Section II of this Application.

(7) A description of the geographic areas in which the transferor and transferee (and their affiliates) offer domestic telecommunications services, and what services are provided in each area.

Transferors, through the operations of Licensee, own a network that provides broadband, voice, and related services to customers in Van Buren, Cleburne, Stone, Searcy, Pope and Conway Counties in Arkansas.

Spectracomm owns Arkwest, which owns a 100% FTTP network providing local and long-distance telephone and Broadband service to residents located in Van Buren and Cleburne Counties in Arkansas. Attached as **Exhibit C** is a map showing Arkwest and Licensee's service area.

Transferee's parent company, PhireLink, owns Rebeltec, which holds certain FCC wireless licenses, which are used to provide high-speed fixed wireless broadband internet service to residential and business customers in Southeastern Colorado and Western Kansas. Rebeltec does not operate in the geographic service area being served by Artelco.

PhireLink also holds ownership interests in entities that provide high-speed fiber-based broadband Internet services to residential and business customers in certain markets.

Transferee has no other licensed affiliates that provide regulated voice services. Other than as disclosed within this Application, none of the upstream entities or individuals above Fiber Acquisition hold a ten percent (10%) or greater ownership interest, either directly or indirectly, in any other licensed entities that provide regulated voice services.

(8) A statement as to how the application fits into one or more of the presumptive streamlined categories in this section or why it is otherwise appropriate for streamlined treatment.

Applicants do not believe that this Application is eligible for streamlined processing, but the Applicants respectfully request expedited treatment of the Application due to the fact that the Transaction will not result in a change in the terms of service for any customer.

(9) Identification of all other Commission applications related to the same transaction.

None.

(10) A statement of whether the applicants are requesting special consideration because either party to the transaction is facing imminent business failure.

Applicants are not requesting special consideration.

(11) Identification of any separately filed waiver requests being sought in conjunction with the transaction.

Applicants are not seeking any waivers in conjunction with this Transaction.

(12) A statement showing how grant of the application will serve the public interest, convenience, and necessity, including any additional information that may be necessary to show the effect of the proposed transaction on competition in domestic markets.

The Transaction described herein will serve the public interest. The financial, technical, and managerial resources that Transferee will bring to Artelco will further enhance Artelco's ability to compete in the telecommunications and broadband services marketplace. Transferee's management team has substantial experience in managing companies that offer telecommunications and broadband to residential and business customers. Transferee is legally, technically, and financially qualified to own and operate Artelco as proposed in the Agreement. Transferee's management team already has experience in managing an incumbent local exchange company in Arkansas through its wholly owned subsidiary Arkwest. Transferee's experience with Arkwest has generated operational efficiencies and service improvements that are expected also to benefit Artelco following the Transaction.

Such benefits include enhanced network planning and deployment capabilities, improved procurement scale for equipment and services, centralized back-office functions (including billing, customer support, and regulatory compliance), the launch of new product offerings, and access to experienced technical personnel. In addition, Transferee has demonstrated the ability to integrate and operate rural telecommunications networks while maintaining service continuity and investing in broadband infrastructure upgrades, including fiber deployment and modernization initiatives. These efficiencies are expected to support continued reliable service and position Artelco for future network enhancements.

At the same time, the proposed Transaction will have no adverse impact on Artelco's current customers. Immediately following the Transaction, those customers will continue to receive their existing services at the same rates, terms, and conditions as at present. Any future changes to the rates, terms, and conditions of service will be made consistent with Commission requirements. The only significant change following the closing of the Transaction from the customers' perspective will be transparent; that Transferee will be the new owner of Artelco.

Furthermore, the proposed Transaction does not present any anti-competitive concerns. The acquisition of Artelco by Transferee will not have an adverse effect on competition in the markets for local, intrastate toll, or domestic interstate telecommunications services. The Transferee and its affiliates do not currently offer local, intrastate toll, or domestic interstate telecommunications services in the service areas currently serviced by the Licensee, so the Transaction will not diminish competition. Furthermore, Applicants will face fierce competition from established service providers in these markets.

IV. INFORMATION REQUIRED BY SECTION 63.18 OF THE COMMISSION'S RULES

The information requested in Sections 63.18 (a)-(c) is contained in Applicants' responses in Section III (1)-(3) of this Application.

(d) Section 214 Authorizations

Licensee: Licensee is authorized to provide interstate service by virtue of blanket domestic Section 214 authority. See 47 C.F.R. § 63.01. Licensee also holds international section 214 authority to provide global or limited global facilities-based and resale service. See ITC-214-20010209-00087) granted on March 14, 2001.

Transferors: The Artelco Shareholders are individuals and partnerships (general and limited), none of which holds Section 214 authority. Other than Licensee, no affiliate of Artelco or any company owned by the Artelco Shareholders, including MCA, holds Section 214 authority.

Transferee: Spectracomm holds no Section 214 authority. Spectracomm's wholly owned subsidiary, Arkwest, is authorized to provide interstate service by virtue of blanket domestic Section 214 authority, but does not hold international Section 214 authority.

(h) Post Transaction Ownership Information (Answer to Questions 11 & 12)/Interlocking Directorates.

See **Section III (4)** above for post-transaction ownership information. To Applicants' knowledge, no person serving on the board or as an officer of Spectracomm serves as an officer or director of a foreign carrier or a domestic carrier affiliate of a foreign carrier.

(i) Foreign Carrier Affiliates (Answer to Question 15)

Transferee certifies that it is not a foreign carrier and is not affiliated, as defined in 47 C.F.R. § 63.09(d) of the Commission's Rules, with a foreign carrier.

(j) Operation to Foreign Destinations (Answer to Question 15)

Transferee certifies that immediately post-Transaction, Transferee (1) will not be a foreign carrier in any country, (2) will not control any foreign carrier in any foreign country, and (3) will not be owned or controlled by any foreign carrier.

(k) Not applicable.

(m) Not applicable.

(n) No Special Concessions

Transferee 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 will not enter into such agreements in the future.

(o) Anti-Drug Abuse Act Certification

Transferee certifies, pursuant to 47 C.F.R. §§ 1.2001-1.2003, that to the best of his knowledge, information, and belief, no party to this Joint Application is subject to denial of federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853a.

(p) Not Applicable.

(q) Compliance Statements

Each Applicant makes the following certifications by which they agree: (i) 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 part 1, subpart Z, of this chapter; (ii) 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: (A) The Wiretap Act, 18 U.S.C. 2510 et seq.; (B) The Stored Communications Act, 18 U.S.C. 2701 et seq.; (C) The Pen Register and Trap and Trace Statute, 18 U.S.C. 3121 et seq.; and (D) Other court orders, subpoenas or other legal process; (iii) 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; (iv) (A) That the Applicant 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 request of the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector ("Committee"), as required in § 1.65(a) of this chapter, and that the Applicant agrees to inform the Commission and the Committee of any substantial and significant changes while an Application is pending; and (B) After the Application is no longer pending for purposes of § 1.65 of the rules, the Applicant must 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 (v) That the Applicant understands that if the Applicant or authorization holder fails to fulfill any of the conditions and obligations set forth in the certifications set out in paragraph (q) of this section 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, applicant and authorization holder 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. With respect to section 63.18(q)(iii), Post-closing, Licensee's point of contact for the execution of lawful requests and as its agent for legal service of process will be: Matthew Debnam at P.O. Box 699, 205 E. 7th Street, Danville, AR 72833.

(r) Streamlined Treatment

Applicants request streamlined processing pursuant to Section 63.12 of the Commission's Rules of the International portion of the Application.[11] Specifically, none of Applicants, nor any of their affiliates, are foreign carriers, and none of Applicants will have any such affiliates following the consummation of the Transaction. Applicants, therefore, qualify for a presumption of non-dominance under Section 63.10 of the Commission's rules on all U.S.-international routes.

V. UNIVERSAL SERVICE FUND INFORMATION

Pursuant to the Wireline Competition Bureau's *Best Practices for Addressing Universal Service Fund Information in Section 214 Transfer of Control Applications*,[12] Applicants provide the following information:

(1) A listing of all USF high cost support received by each entity to be transferred and by the transferee and each affiliate of the transferee.

In 2025, Artelco received A-CAM II support in the amount of $2,432,979.60 and CAF-ICC support in the amount of $220,692. In 2025, the Transferee, through its wholly-owned subsidiary, Arkwest, received Enhanced A-CAM support in the amount of 4,072,331.34 and CAF-ICC support in the amount of $907,002.00. Arkwest is the only affiliate of Transferee that received any high-cost support in 2025.

(2) Confirmation of whether the entity or entities to be transferred are Eligible Telecommunications Carriers (ETC) under section 214(e) of the Act.

Artelco holds an ETC designation in Arkansas. Spectracomm's subsidiary, Arkwest, also holds an ETC designation in Arkansas. No other Applicants or affiliates of Applicants hold an ETC designation.

(3) If the entity or entities to be transferred have been awarded CAF Phase II or RDOF funding, provide a summary addressing any changes to management, technology, or debt that would result from the proposed transaction, as well as whether there are any changes that might occur that would compromise the support recipients' ability to meet their service obligations.

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11 47 C.F.R. § 63.12.

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

Artelco does not receive CAF Phase II or RDOF funding.

(4) A list of study area codes (SACs) for each entity to be transferred and for each affiliate of the entity or entities to be transferred, and for the transferee and each affiliate of the transferee.

The SAC associated with Artelco's ETC is 401692.

The SAC associated with Tranferee's affiliate, Arkwest's ETC, is 401734.

(5) A confirmation of whether the entity or entities to be transferred participate in the Lifeline program, Emergency Broadband Benefit program, or the Affordable Connectivity Program, and whether such participation will continue if the transaction is consummated.

Artelco participated in the Affordable Connectivity Program when active and participates in the Lifeline program. Artelco will continue to participate in the Lifeline program and intends to participate in future replacement programs for the Affordable Connectivity Program.

(6) A report on any Broadband Equity, Access and Deployment ("BEAD") funding or other non-USF supported subsidy or grant received by Applicants or any Applicant affiliate.

Rebeltec has been awarded a grant as a subrecipient from the Advance-Colorado Broadband Equity, Access and Deployment ("BEAD") program. Grant Agreement number 00000183 was signed on June 3, 2026. The awarded amount is $867,300.00 to deploy qualifying service to 1,196 locations in Eastern Colorado. Implementation is in preliminary phases, and no payments have been made to date. No other Applicant or Affiliate of an Applicant has been awarded any BEAD or other non-USF supported subsidy or grant in any other state. The entity being acquired in this transaction has not been awarded or provisionally awarded BEAD funding in the Transferee's (or affiliate) high-cost SAC(s). Additionally, the Transferee or its affiliate has not been awarded or provisionally awarded BEAD funding in the high-cost SAC(s) being transferred.

V. CONCLUSION

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

Respectfully submitted,

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Strategies Law Group, PLLC
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Falls Church, Virginia 22046
Telephone: (571) 730-4970
bmcdermott@stratlg.com
equill@stratlg.com

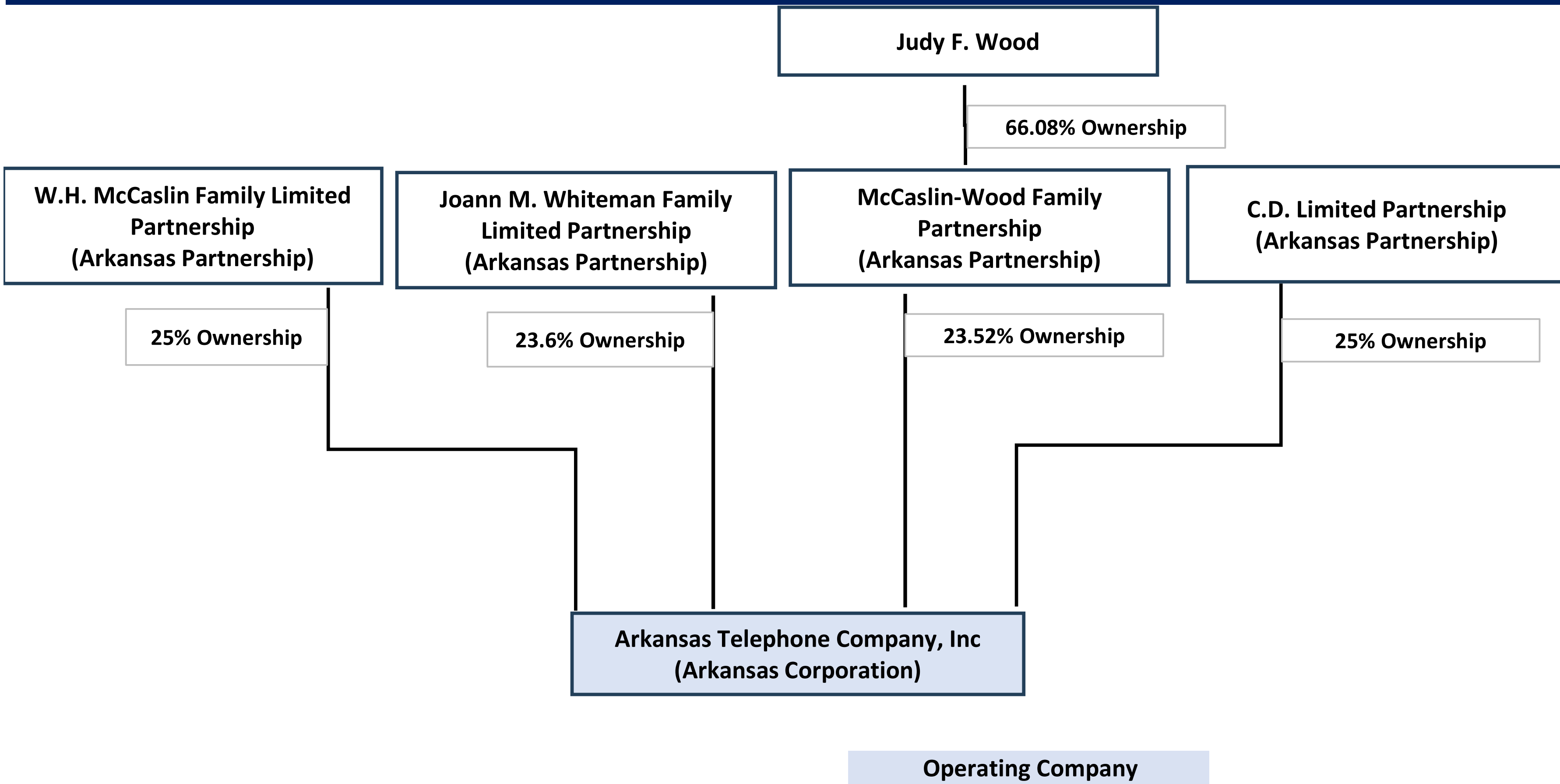
Counsel for Applicants

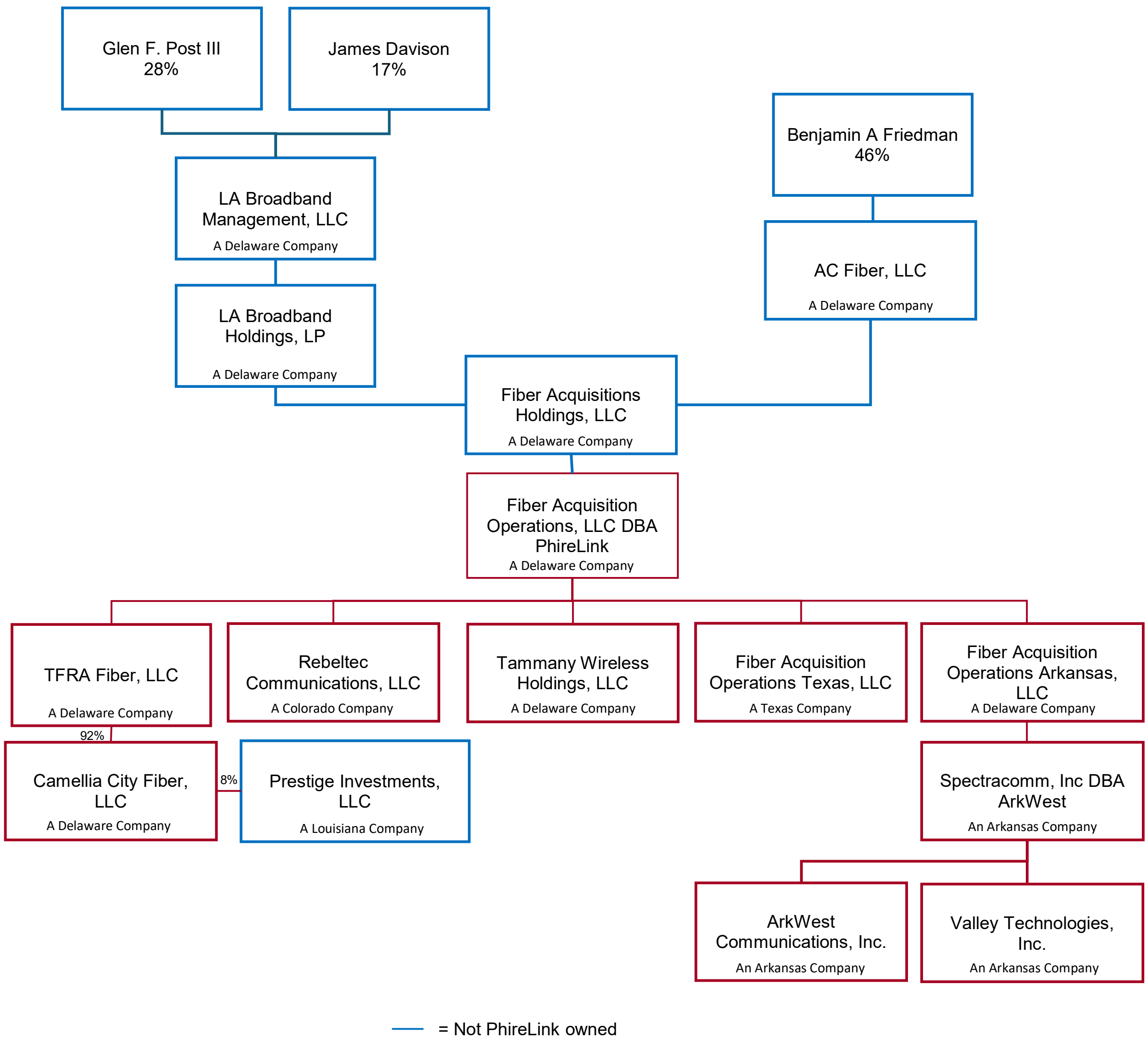
Dated: July 21, 2026

<u>Exhibit A</u>

Applicants' Current Organizational Chart

Artelco Pre-Transaction Organizational Chart

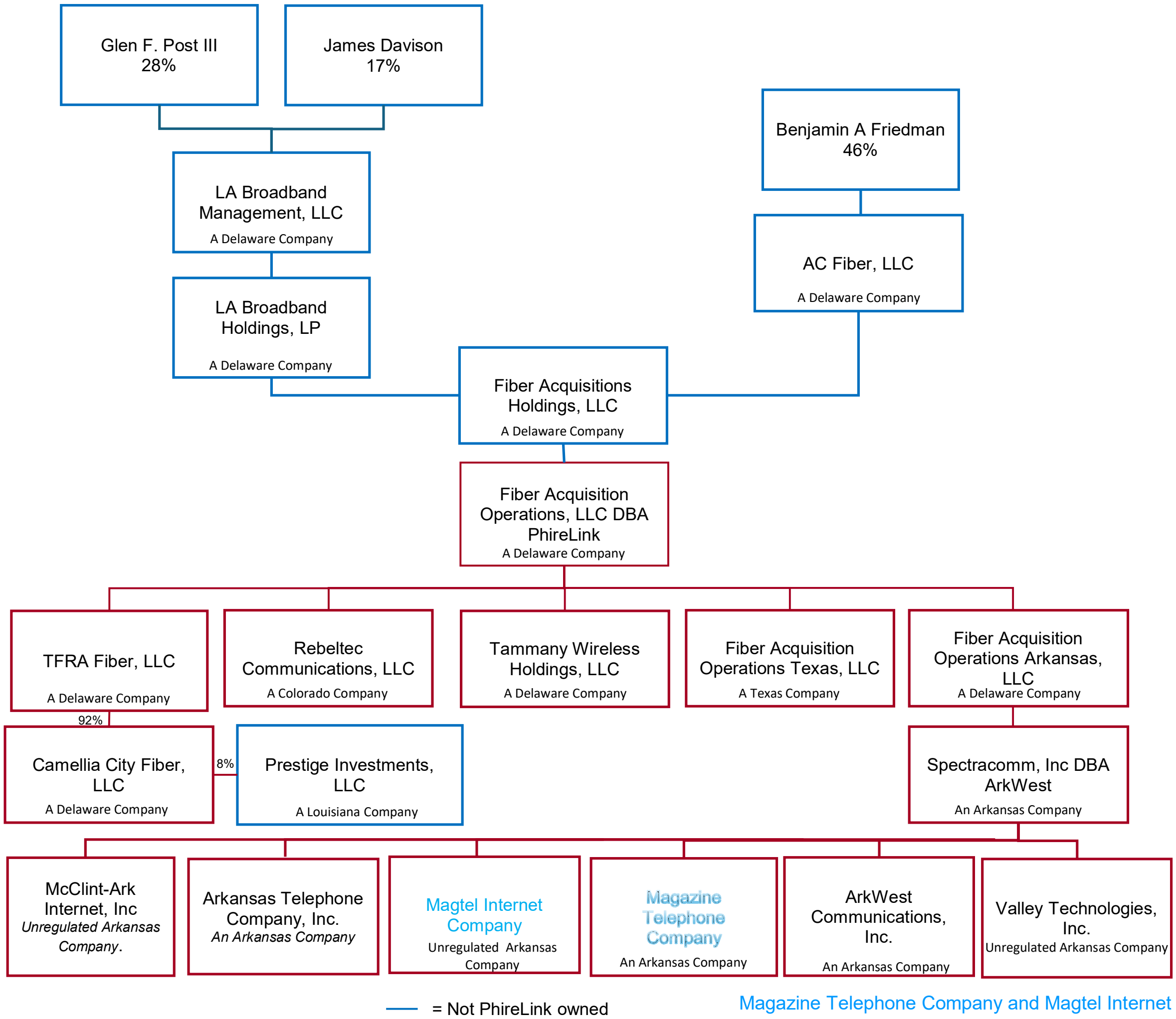




Glen F. Post III
28%
James Davison
17%
Benjamin A Friedman
46%
LA Broadband Management, LLC
A Delaware Company
AC Fiber, LLC
A Delaware Company
LA Broadband Holdings, LP
A Delaware Company
Fiber Acquisitions Holdings, LLC
A Delaware Company
Fiber Acquisition Operations, LLC DBA PhireLink
A Delaware Company
TFRA Fiber, LLC
A Delaware Company
Rebeltec Communications, LLC
A Colorado Company
Tammany Wireless Holdings, LLC
A Delaware Company
Fiber Acquisition Operations Texas, LLC
A Texas Company
Fiber Acquisition Operations Arkansas, LLC
A Delaware Company
92%
Camellia City Fiber, LLC
A Delaware Company
8%
Prestige Investments, LLC
A Louisiana Company
Spectracomm, Inc DBA ArkWest
An Arkansas Company
ArkWest Communications, Inc.
An Arkansas Company
Valley Technologies, Inc.
An Arkansas Company
= Not PhireLink owned

Exhibit B

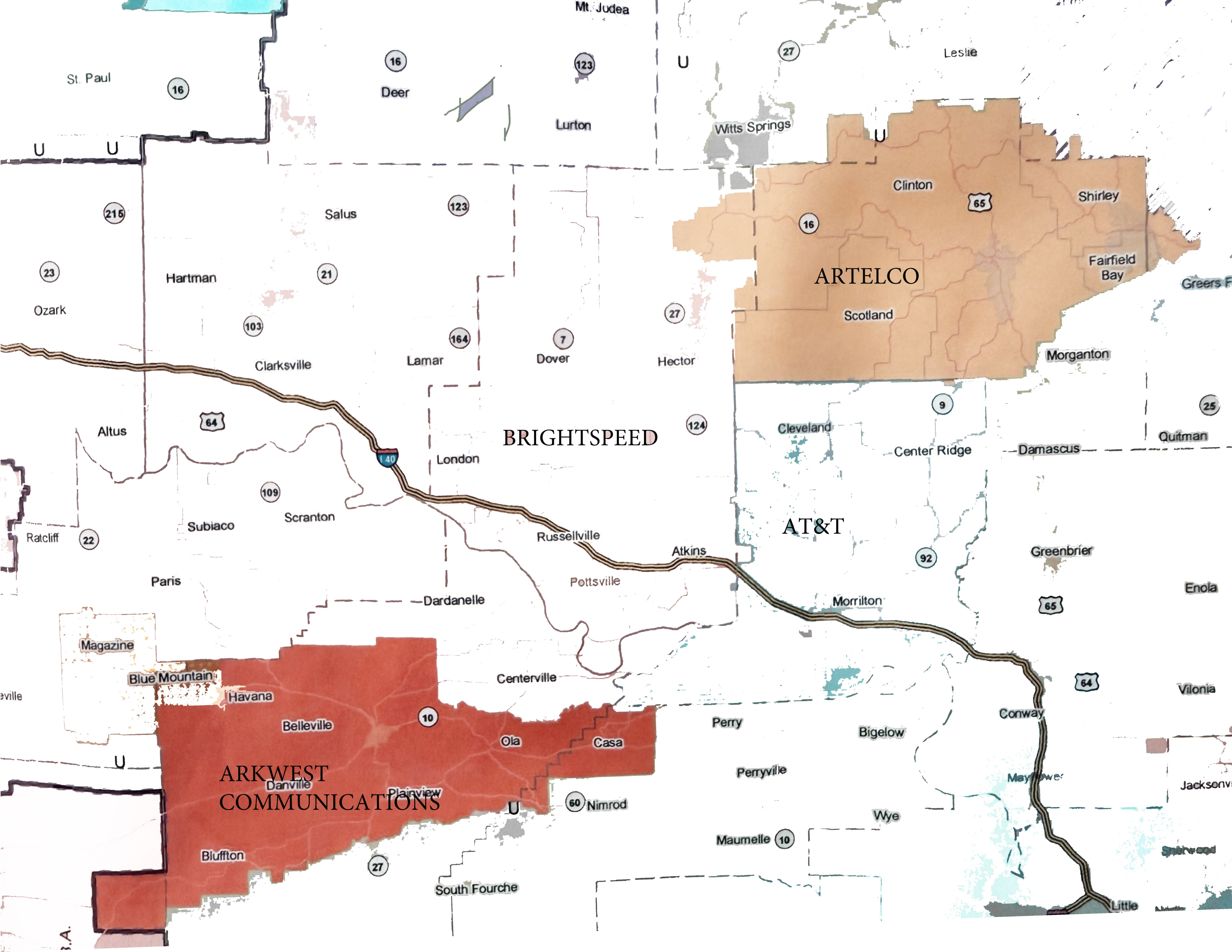
Applicants' Organizational Chart Post-Transaction



Magazine Telephone Company and Magtel Internet Company are pending regulatory approval and closing.

<u>Exhibit C</u>

Arkwest and Licensee's Service Areas



ARTELCO
BRIGHTSPEED
AT&T
ARKWEST COMMUNICATIONS
Mt. Judea
St. Paul
Deer
Lurton
Leslie
Witts Springs
Clinton
Shirley
Fairfield Bay
Greers F
Scotland
Morganton
Salus
Hartman
Ozark
Clarksville
Lamar
Dover
Hector
Altus
London
Cleveland
Center Ridge
Damascus
Quitman
Subiaco
Scranton
Russellville
Atkins
Ratcliff
Paris
Pottsville
Dardanelle
Morrilton
Greenbrier
Enola
Magazine
Blue Mountain
Havana
Belleville
Ola
Casa
Centerville
Perry
Bigelow
Conway
Vilonia
Danville
Plainview
Nimrod
Perryville
Mayflower
Jacksonv
Wye
Maumelle
Bluffton
South Fourche
Little
Sherwood

Verification

I, Randy McCaslin, Presdient of Arkansas Telephone Company, Inc., certify that with respect to Arkansas Telephone Company, Inc., the information in the foregoing Application is true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 16th day of July, 2026.

Signed by:

D92394EE88E147B

Randy McCaslin

Verification

I, M. Todd Wood, authorized representative of the shareholders of Arkansas Telephone Company, Inc., certify that with respect to those shareholders, the information in the foregoing Application is true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 16th day of July, 2026.

Signed by:

M. Todd Wood

71D699E751CA433...

M. Todd Wood

Verification

I, Matthew Debnam, Chief Financial Officer of Spectracomm, Inc., certify that with respect to Spectracomm, Inc., the information in the foregoing Application is true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 16th day of July, 2026.

Signed by:
Matthew Debnam
1DF9C84E69F448F...

Matthew Debnam