

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

In the Matter of the Joint Application of)

RSTN Communications LLC, Transferee)

Robert E. Mocas and Heidi H. Mocas, Transferors)

And)

Easton Telecom Services, L.L.C., Licensee)

For Grant of Authority Pursuant to Section 214)

Of the Communications Act of 1934, as amended,)

And Sections 63.04 and 63.24 of the Commission's)

Regulations to Transfer Control of Licensee)

WC Docket No. 26-_____

IB File No. ITC-T/C-2026-_____

JOINT APPLICATION

RSTN Communications LLC ("Transferee"), Robert E. Mocas and Heidi H. Mocas (collectively, the "Mocas" or "Transferors") and Easton Telecom Services, L.L.C. ("Licensee") (Transferee, Transferors and Licensee collectively, the "Applicants"), pursuant to Section 214 of the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. § 214, and Sections 63.04 and 63.24 of the Commission's Rules, 47 C.F.R. §§ 63.04 & 63.24, request Commission approval to transfer ownership and control of Licensee to Transferee (the "Transaction").

The Transaction involves the acquisition by Transferee of 100 % of the equity ownership of Licensee from its current owners, the Mocas. Transferee is owned by two experienced telecommunications industry executives Kevin Alward (indirectly) and Nicholas Felmlee (directly), each of whom owns more than 10% of telecommunications service provider RingSquared LLC ("RingSquared"), as further detailed below. While Licensee, before and after the Transaction, has and will have no corporate affiliation with RingSquared, Transferee and

RingSquared (and RingSquared's wholly-owned subsidiaries)^{1/} will be considered affiliates upon completion of the Transaction, pursuant to the Commission's 10% rule (such affiliates referred to hereafter as "Affiliates") in that they will share 10% or greater owners.

Following closing of the Transaction, Licensee will continue to operate as before; none of its services, prices, or billing systems will be changed.

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

I. Description of the Applicants

a. Transferee

Transferee, RSTN Communications, LLC, is a Delaware limited liability company with principal offices located at 111 1st Ave. North, Ste. 202, Lewisburg, Tennessee. Transferee, through its wholly owned subsidiary, Megawatt Communications LLC (Megawatt), presently provides local exchange, long distance, and intrastate telecommunications services in the State of Tennessee, and is authorized by the FCC to provide interstate telecommunications services.

Transferee is owned by Kevin Alward (indirectly, through a trust) and Nicholas Felmlee.^{2/} A diagram showing the ownership structure of Transferee is attached hereto as **Exhibit A**. Mr. Alward has spent the past 30 years leading numerous communications companies that serve a variety of sectors, including enterprise, finance, government, and technology. Mr. Alward has been the Chief Executive Officer of RingSquared since 2016. Upon the consummation of the Transaction, Mr. Alward will serve as Chief Executive Officer and a Manager of Licensee. Mr. Felmlee also has extensive telecommunications experience dating back to his work with Lucent

¹ RingSquared APC LLC, RingSquared CC LLC and RingSquared Telecom LLC.

² Nicholas Felmlee is in the process of transferring his direct ownership in RSTN into a Living Trust for estate planning purposes. Mr. Felmlee will be the Trustee of the Trust and therefore will maintain control of his ownership percentage through his position as Trustee. Transferee will file for any required pro forma approvals at the appropriate time.

Technologies/Bell Labs in 1997 and will serve as Chief Technology Officer of Licensee. Additional background on both Mr. Alward and Mr. Felmlee are attached hereto as **Exhibit B**.

Mr. Alward has a 38% ownership interest and Mr. Felmlee has a 12% ownership interest in RingSquared, a Delaware limited liability company and telecommunications provider which offers local exchange, long distance, and international telecommunications services to customers in 37 states.^{3/} RingSquared wholly owns three subsidiary affiliates, RingSquared APC LLC, RingSquared CC LLC and RingSquared Telecom LLC, each of which operates in additional states.^{4/} Diagrams showing the ownership structure of RingSquared and RingSquared's relationship to each of its subsidiary operating affiliates are attached hereto as **Exhibit C**. Neither RingSquared nor any of its Affiliates are incumbent local exchange carriers ("ILECs") or receive Connect America Fund Broadband Loop Support ("CAF-BLS").

After the Transaction, Transferee will own 100 % of Licensee.

b. Transferors

Transferors, Robert and Heidi Mocas, are individuals residing in Richfield, Ohio. Robert and Heidi Mocas each own 50% of the Licensee. Transferors do not individually hold any communications licenses or provide any communications services except through their ownership of Licensee.

³ See Section VI.b., for the list of states in which RingSquared operates. Both Mr. Alward and Mr. Felmlee are proceeding with transferring their direct RingSquared ownership interests into their respective Trusts. Mr. Felmlee's 12% direct ownership interest in RingSquared will be transferred into The Felmlee Living Trust with Mr. Felmlee being the Trustee. Mr. Alward's 38% direct ownership in RingSquared will be transferred into The Kevin A. Alward Revocable Trust with Mr. Alward being the Trustee. RingSquared will file for any required pro forma approvals at the appropriate time.

⁴ See Section VI.b. for the list of states in which each RingSquared subsidiary affiliate operates.

c. Licensee

Licensee, Easton Telecom Services, L.L.C., is an Ohio limited liability company with principal offices located at 3046 Brecksville Rd, Richfield, Ohio.⁵/ Licensee is a licensed communications provider in 39 states and the District of Columbia, and holds authority from the Commission to provide domestic interstate and international telecommunications services. Licensee's services include local exchange service, point-to-point private line service, Multiprotocol Label Switching service, local area network service, direct inward dialing service, and Integrated Services Digital Network, including both Basic Rate Interface and Primary Rate Interface service.

II. Description of the Transaction

Pursuant to a Membership Interest Purchase Agreement dated May 12, 2026, Transferee will acquire the entire equity ownership interest in Licensee. Consequently, upon closing the ultimate control of Licensee will be held by Transferee. As noted above, immediately following closing, Licensee will continue to operate as before; none of its services, prices, or billing systems will be changed. As a result, the transaction will be entirely transparent to Licensee's end users. Any changes in service offerings, prices, etc. will occur over time, in the normal course of business.

Diagrams of the pre- and post-Transaction corporate ownership structure of Licensee are provided as **Exhibit D**.

⁵ In 1999, Easton Telecom Services, Inc. ("Easton") sold its business to Teligent, Inc. ("Teligent"), and the transfer was approved by the Federal Communications Commission ("FCC") (See ITC-T/C-19991220-00812). Approximately a year following the sale of Easton, Teligent filed Bankruptcy (See: Case NO. 01-12974; (SDNY Bankruptcy Court). In 2002, through a Bankruptcy Court auction, the former owner of Easton reacquired the customers of Easton through an acquisition subsidiary, Weston Telecommunications, LLC, which subsequently changed its corporate name to Easton Telecom Services, L.L.C. Neither Easton nor Transferee can locate evidence of the FCC's approval of this transaction. However, evidence of the corporate name change, and filing of the Anti-Slamming Waiver and Customer Notice have been located.

III. Request for Streamlined Processing

Applicants respectfully submit that this Application is eligible for streamlined processing pursuant to Sections 63.03 and 63.12 of the Commission's Rules, 47 C.F.R. §§ 63.03 & 63.12.

With respect to domestic authority, this Application is eligible for streamlined processing pursuant to Section 63.03(b)(2)(i) because, immediately following the Transaction:

- Applicants (including their Affiliates, as that term is defined in Section 3(1) of the Act) combined will hold less than a ten percent (10%) share of the interstate, interexchange market;
- Applicants and their Affiliates will provide competitive telephone exchange services or exchange access services exclusively in geographic areas served by dominant local exchange carriers (none of which is a party to the proposed Transaction); and
- Neither the Applicants nor any of their Affiliates are regulated as dominant with respect to any service.

With respect to international authority, this Application is eligible for streamlined processing pursuant to Section 63.12(a)-(b) of the Commission's Rules, 47 C.F.R. § 63.12(a)-(b). Specifically, none of the exclusionary criteria set forth in Section 63.12(c) applies to this Application, as described more fully in Section V.p. below. Moreover, Applicants are not affiliated with any foreign carrier or dominant domestic carrier.

IV. Public Interest Considerations

a. The Transaction Will Not Harm the Public Interest

Under Section 214(a) of the Act, 47 U.S.C. § 214(a), the Commission must determine whether a proposed transfer of control of a provider of interstate or international

telecommunications services is consistent with the public interest, convenience, and necessity.⁶ In making such a determination, the Commission, among other matters, assesses “whether the proposed transaction complies with the specific provisions of the Act, other applicable statutes, and the Commission’s rules.”⁷ If a proposed transaction would not violate the Act, any other applicable statute, or any of the Commission’s rules, the Commission then considers whether a proposed transaction “could result in public interest harms by substantially frustrating or impairing the objectives or implementation of the [Communications] Act or related statutes.”⁸

The Applicants respectfully submit that they are not aware of any public interest harm that will arise from the Commission’s approval of the Transaction. Applicants further submit that approval of this Application would not frustrate or impair the Commission’s implementation or enforcement of the Act or interfere with the objectives of the Act or other statutes. To the contrary, as detailed below, the Applicants believe that the proposed Transaction will offer public interest benefits without any material countervailing harms. In the absence of any such harms, transaction-specific conditions are unnecessary.

⁶ See, e.g., Applications of Level 3 Communications, Inc. and CenturyLink, Inc. for Consent to Transfer Control of Licenses and Authorizations, Memorandum Opinion and Order, 32 FCC Rcd. 9581, 9585 ¶ 8 (2017) (“Level 3-CenturyLink Order”); Applications of AT&T Inc. and DIRECTV For Consent to Assign or Transfer Control of Licenses and Authorizations, Memorandum Opinion and Order, 30 FCC Rcd. 9131, 9139-40 ¶ 18 (2015) (“AT&T-DIRECTV Order”); Applications of XO Holdings and Verizon Communications Inc. For Consent to Transfer Control of Licenses and Authorizations, Memorandum Opinion and Order, 31 FCC Rcd. 12,501, 12,504-05 ¶ 7 (Wireline Comp., Int’l, and Wireless Tel. Burs. 2016) (“Verizon-XO Order”).

⁷ Level 3-CenturyLink Order, 32 FCC Rcd. at 9585 ¶ 8; AT&T-DIRECTV Order, 30 FCC Rcd. at 9139-40 ¶ 18 (citations omitted); Verizon-XO Order, 31 FCC Rcd. at 12,504-05 ¶ 7 (citations omitted); Applications of SoftBank Corp., Starburst II, Inc., Sprint Nextel Corp., and Clearwire Corp., Memorandum Opinion and Order, Declaratory Ruling, and Order on Reconsideration, 28 FCC Rcd. 9642, 9650 ¶ 23 (citations omitted) (“Softbank-Sprint-Clearwire Order”); Applications Filed by Qwest Communications International Inc. and CenturyTel, Inc. d/b/a CenturyLink For Consent to Transfer Control, Memorandum Opinion and Order, 26 FCC Rcd. 4194, 4198-99 ¶ 7 (citation omitted) (“Qwest-CenturyLink Order”).

⁸ Level 3-CenturyLink Order, 32 FCC Rcd. at 9585 ¶ 9; AT&T-DIRECTV Order, 30 FCC Rcd. at 9140 ¶ 18 (citation omitted); Verizon-XO Order, 31 FCC Rcd. at 12,504-05 ¶ 7 (citation omitted); SoftBank-Sprint-Clearwire Order, 28 FCC Rcd. at 9651 ¶ 23 (citation omitted); Qwest-CenturyLink Order, 26 FCC Rcd. at 4199 ¶ 7.

b. The Proposed Transaction Will Benefit the Public Interest

The Transaction is demonstrably in the public interest because it will generate substantial benefits and result in no countervailing harms. Primarily, consummation of the Transaction will allow the Transferee to leverage its decades of experience in the telecommunications industry to invest in the Licensee's operations and consolidate its systems with Transferee's systems. This will result in an enhanced service experience for consumers. Transferee intends to provide a more robust customer service experience and an enhanced billing platform to its customers following the closing of the Transaction. In addition, after the transaction has closed, the overall increased number of customers will permit Transferee to more economically deploy newer technologies that would not be as economically viable with its smaller, existing customer base. In addition, the transfer of control will increase competition, as the Transaction will enable investment by the Transferee in the Licensee's operations, renewing their ability to offer new and advanced services to consumers and provide a competitive alternative to other providers' services.

Further, the Transaction also ensures continuity of operations for Licensee to the ultimate benefit of customers who will continue to receive uninterrupted access to telecommunications and information services. The Transaction will only alter the ownership of Licensee and will not affect any of Licensee's operations—except to the extent it enhances those operations as described above. Licensee's customers will continue to receive the same services and the same rates, terms, and conditions of service post-closing. There will be no disruption to any customer-facing operations such as ordering, service installation, customer service, and billing, which will continue to be provided as before. Any future changes affecting customers will result from the normal course of business operations, as was the case prior to the Transaction. No assignment of licenses, assets, or

customers by Licensee will occur as a consequence of the Transaction. Accordingly, this Transaction will be, for all practical purposes, imperceptible to Licensee's customers.

V. Information Required by Section 63.24

Pursuant to Section 63.24(e)(2) of the Commission's rules, 47 C.F.R. § 63.24(e)(2), the Applicants provide the

following information pursuant to Sections 63.18(a)-(d) and (h)-(p) in support of this Application:

a. Name, address and telephone number of each Applicant:

Licensee: Easton Telecom Services, L.L.C.
3046 Brecksville Rd.
Richfield, OH 44286
Tel. (330) 659-6200

Transferors: Robert E. Mocas and Heidi H. Mocas
3046 Brecksville Rd.
Richfield, OH 44286
Tel. (330) 659-6200

Transferee: RSTN Communications LLC
111 1st Ave. North, Ste. 202
Lewisburg, TN 37091
Tel. (212) 277-8040

b. Jurisdictions of Organization:

Licensee: Ohio

Transferors: N/A

Transferee: Delaware

c. Contacts for correspondence concerning this Application should be sent to:

Licensee: Easton Telecom Services, L.L.C.
3046 Brecksville Rd.
Richfield, OH 44286
Telephone: (330) 659-6200
Email: rmocas@eastontelecom.com
Email: hmocas@eastontelecom.com

Transferors: Robert and Heidi Mocas
3046 Brecksville Rd.
Richfield, OH 44286
Telephone: (330) 659-6200
Email: rmocas@eastontelecom.com
Email: hmocas@eastontelecom.com

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Counsel to Transferee

d. (Answer to Question 10) 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*, IB File No. ITC-214-20011213-00629.

Transferors: None.

Transferee: Transferee is a holding company that does not hold any Section 214 authorizations.

Transferee's subsidiary affiliate, Megawatt, is authorized to provide interstate service by virtue of blanket domestic Section 214 authority.

Transferee's affiliate through common ownership, RingSquared LLC, is authorized to provide interstate service by virtue of blanket domestic Section 214 authority. RingSquared LLC also holds international Section 214 authority to provide global facilities-based service. *See*, IB File No. ITC-214-19961031-00548.

Transferee's affiliate through common ownership, RingSquared Telecom LLC, is authorized to provide interstate service by virtue of blanket domestic Section 214 authority.

RingSquared Telecom LLC also holds multiple international Section 214 authorizations:

- IB File No. ITC-214-19991019-00660 (global or limited facilities-based and resale)
- IB File No. ITC-214-20010719-00393 (global facilities-based or global resale)
- IB File No. ITC-214-20110131-00021 (global or limited facilities-based and resale)
- IB File No. ITC-214-20150605-00136 (global or limited facilities-based and resale)

h. (Answer to Questions 11 & 12) Ownership:

Licensee: Licensee is equally owned by Robert E. Mocas and Heidi H. Mocas, both U.S. citizens residing at 3046 Brecksville Rd., Richfield, OH 44286.

Robert E. Mocas and Heidi H. Mocas each own 50% of Licensee.

Transferors: N/A

Transferee: Transferee is owned by:

Name:	2015 Alward Children's Trust
Address:	14 Industrial Ave., Suite 4
	Mahwah, NJ 07430
Domicile:	U.S.

Principal Business: Telecommunications investments
Percent Interest: 66.00%

Name: Nicholas Felmlee
Address: 14 Industrial Ave., Suite 4
Mahwah, NJ 07430

Principal Business: Telecommunications executive
Percent Interest: 34.00%

Kevin Alward is the Grantor of the 2015 Alward Children's Trust and his spouse, Belinda Alward, is its Trustee.

Following the Transaction, Mr. Felmlee, for estate planning purposes, plans to transfer his interest in Transferee into the revocable living trust he created on March 2, 2026. Transferee will file for any required *pro forma* approvals at the appropriate time.

No other person or entity is expected to hold a 10% or greater ownership interest in the Licensee pursuant to the Commission's attribution rules as a result of the consummation of the Transaction.

Applicants do not have any interlocking directorates with a foreign carrier.

i. (Answer to Question 14):

Applicants certify that none is a foreign carrier and that none is currently affiliated with any foreign carrier.

j. (Answer to Question 15):

Applicants certify that they do not seek to provide international telecommunications services to any destination country where:

- (1) any Applicant is a foreign carrier in that country;
- (2) any Applicant controls a foreign carrier in that country;

(3) any entity that owns more than 25 percent of an Applicant, or that controls an Applicant, controls a foreign carrier in that country; and

(4) two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of an Applicant 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.

k. Not applicable.

l. [Reserved].

m. Not applicable.

n. Applicants certify that none has 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. Applicants certify, pursuant to 47 C.F.R. §§ 1.2001-1.2003, that to the best of their 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. Applicants respectfully submit that this Application is eligible for streamlined processing pursuant to Section 63.12(a)-(b) of the Commission's Rules, 47 C.F.R. § 63.12(a)-(b). Applicants are not affiliated with any foreign carrier or any dominant U.S. carrier whose international switched or private line services Applicants seek authority to resell, and Applicants will not be so affiliated post-close. None of the other exclusions described in Section 63.12(c) applies.

VI. Information Required by Section 63.04

Pursuant to Commission Rule 63.04(b), 47 C.F.R. § 63.04(b), Applicants submit the following information in support of their request for domestic Section 214 authority to transfer indirect control of Licensee to Transferee to address the requirements set forth in Section 63.04(a)(6)-(12) of the Commission's Rules:

a. (a)(6) Description of the Transaction

See, Section II, above, and **Exhibit D**.

b. (a)(7) Geographic Serving Areas of the Applicants

Licensee: Licensee provides local exchange, long distance and international telecommunications services in the following jurisdictions:

States	Types of Services
Alabama	Toll Resale
Arkansas	IXC & CLEC
California	CLC-CLR
Colorado	Voip
Connecticut	VoIP & CLEC
Delaware	VoIP
Florida	VoIP and CLEC
Georgia	VoIP and Resale
Idaho	IXC/CLEC
Iowa	IXC/CLEC/VoIP
Illinois	IXC/CLEC/CMRS
Indiana	CLEC/IXC
Kansas	VoIP/IXC
Kentucky	IXC/CLEC

Massachusetts	IXC/CLEC
Maryland	IXC
Michigan	IXC/CLEC
Minnesota	IXC
Missouri	CLEC/IvoIP
Nebraska	IXC & CLEC
North Carolina	IXC/CLEC
North Dakota	
New Jersey	VoIP
New Mexico	IXC
Nevada	IXC
New York	IXC/CLEC
Ohio	IXC/CLEC
Oklahoma	Reseller
Oregon	Reseller, Toll, CLEC
Pennsylvania	CLEC/IXC
Rhode Island	IXC
South Dakota	IXC & CLEC
South Carolina	IXC
Tennessee	IXC
Texas	CLEC/IXC
Utah	
Washington	Active on WUTC
Wisconsin	
West Virginia	IXC
Wyoming	CLEC

Transferors: Not applicable.

Transferee: The Transferee is a holding company and has no serving areas.

Transferee's sole current subsidiary affiliate, Megawatt, provides local exchange, long distance, and intrastate telecommunications services in Tennessee.

Transferee's affiliate through common ownership, RingSquared, provides local exchange, long distance, and international telecommunications services in the following jurisdictions:

States	Types of Service(s)
Alabama	Long distance
Arkansas	Long distance
California	Local exchange
Colorado	Long distance
Connecticut	Long distance
Florida	Long distance
Georgia	Local exchange
Hawaii	Long distance
Iowa	VoIP and long distance
Idaho	Long distance
Illinois	Long distance
Indiana	Long distance
Kansas	Long distance
Louisiana	Long distance
Massachusetts	Local exchange
Maryland	Long distance
Maine	Long distance
Minnesota	Long distance
Missouri	Long distance
Mississippi	Local exchange
North Carolina	Long distance
North Dakota	Long distance
Nebraska	Long distance
New Hampshire	Long distance
New Jersey	Long distance
New Mexico	Long distance

Nevada	Long distance
New York	Long distance
Oklahoma	Long distance
Pennsylvania	Long distance
Rhode Island	Local exchange
South Carolina	Long distance
Texas	VoIP
Washington	Local exchange and long distance
Wisconsin	Local exchange
West Virginia	Long distance
Wyoming	Local exchange

RingSquared's wholly-owned subsidiary affiliate, RingSquared APC LLC, is a Delaware limited liability company that provides wholesale and retail access, voice, and data, as well as local exchange and long distance telecommunications services in Massachusetts.

RingSquared's wholly-owned subsidiary affiliate, RingSquared CC LLC, is a Delaware limited liability company that provides wholesale and retail access, voice, and data, as well as local exchange and long distance telecommunications services in Massachusetts and Rhode Island.

RingSquared's wholly-owned subsidiary affiliate, RingSquared Telecom LLC, is a Delaware limited liability company that provides local telecommunications, long distance, and/or interconnected VoIP services almost exclusively to business customers, on both a retail and wholesale basis in the following jurisdictions:

States	Types of Service(s)
Alabama	VoIP and long distance
Alaska	VoIP and long distance
Arizona	Long distance
Arkansas	VoIP
California	VoIP, long distance, and local exchange
Colorado	VoIP, long distance, and local exchange
Connecticut	VoIP and local exchange
Delaware	VoIP, long distance, and local exchange

Florida	VoIP, long distance, and local exchange
Georgia	VoIP, long distance, and local exchange
Idaho	VoIP, long distance, and local exchange
Illinois	VoIP, long distance, and local exchange
Indiana	VoIP, long distance, and local exchange
Iowa	VoIP and long distance
Kansas	VoIP, long distance, and local exchange
Kentucky	VoIP, long distance, and local exchange
Louisiana	VoIP, long distance, and local exchange
Maine	VoIP, long distance, and local exchange
Maryland	VoIP, long distance, and local exchange
Massachusetts	VoIP, long distance, and local exchange
Michigan	VoIP, long distance, and local exchange
Minnesota	VoIP, long distance, and local exchange
Mississippi	VoIP
Missouri	VoIP, long distance, and local exchange
Montana	VoIP, long distance, and local exchange
Nebraska	VoIP
Nevada	VoIP, long distance, and local exchange
New Hampshire	VoIP, long distance, and local exchange
New Jersey	VoIP, long distance, and local exchange
New Mexico	VoIP
New York	VoIP, long distance, and local exchange
North Carolina	VoIP and long distance
North Dakota	VoIP, long distance, and local exchange
Ohio	VoIP, long distance, and local exchange
Oklahoma	VoIP and long distance
Oregon	VoIP, long distance, and local exchange
Pennsylvania	VoIP, long distance, and local exchange
South Carolina	VoIP
South Dakota	VoIP and long distance
Tennessee	VoIP, long distance, and local exchange
Texas	VoIP, long distance, and local exchange
Utah	VoIP, long distance, and local exchange
Vermont	VoIP, long distance, and local exchange
Virginia	VoIP and long distance
Washington	VoIP, long distance, and local exchange
Washington, D.C.	VoIP, long distance, and local exchange
West Virginia	VoIP, long distance, and local exchange
Wisconsin	VoIP, long distance, and local exchange
Wyoming	VoIP and long distance

c. (a)(8) Streamlined Treatment

See, Section III, above.

d. (a)(9) Other Related Applications before the Commission

The Applicants have no other related applications before the Commission.

e. (a)(10) Statement of Imminent Business Failure

No party is requesting special consideration because it is facing imminent business failure.

f. (a)(11) Separately-Filed Waiver Requests

None.

g. (a)(12) Public Interest Statement

A statement showing how a grant of the Application will serve the public interest, convenience, and necessity is provided in Section IV, above.

VII. Conclusion

For the foregoing reasons, the Applicants respectfully request that the Commission place this Joint Application on streamlined processing for its domestic and international Section 214 transfer of control request and promptly grant this Joint Application.

Respectfully Submitted,

/s/ Chris Van de Verg

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Counsel to Licensee and Transferors

Dated: July 28, 2026

List of Exhibits

Exhibit A - Diagram showing the ownership structure of Transferee

Exhibit B - Professional background of Messrs. Alward and Felmlee

Exhibit C - Diagrams showing the ownership structure of RingSquared and its subsidiaries

Exhibit D - Diagrams of the pre- and post-Transaction corporate ownership structure of Licensee

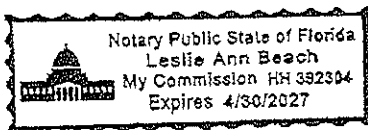
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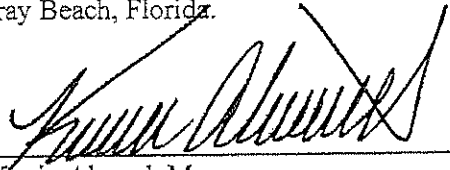
STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

VERIFICATION

I, Kevin Alward, state that I am the Manager of RSTN Communications LLC, that I am authorized to make this Verification on behalf of RSTN Communications LLC as Transferee, that the foregoing filing was prepared under my direction and supervision; that Transferee is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988; and that the contents thereof and the certifications contained therein with respect to RSTN Communications LLC and its subsidiaries are true and correct to the best of my knowledge, information and belief.

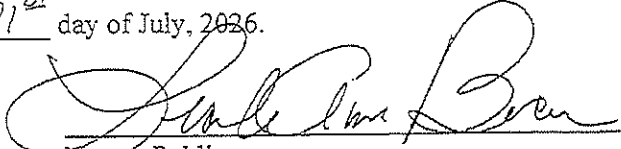
I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief and that this Verification was executed on this 21st day of July, 2026 at Delray Beach, Florida.





Kevin Alward, Manager
RSTN Communications LLC

Sworn and subscribed before me this 21st day of July, 2026.



Notary Public

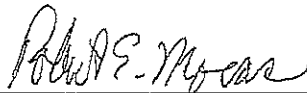
My commission expires: 4/30/2027

STATE OF Ohio)
COUNTY OF Summit)

VERIFICATION

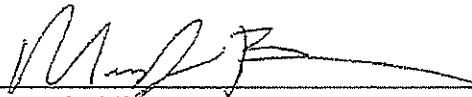
I, Robert Mocas, state that I am the President of Easton Telecom Services, L.L.C., that I am authorized to make this Verification on behalf of myself as Transferor and on behalf of Easton Telecom Services, L.L.C. as Licensee; that the foregoing filing was prepared under my direction and supervision; that Transferors and Licensee are not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988; and that the contents thereof and the certifications contained therein with respect to Transferors and Easton Telecom Services, L.L.C. are true and correct to the best of my knowledge, information and belief.

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief and that this Verification was executed on this 21st day of July, 2026 at Richfield, Ohio.



Robert Mocas, President
Easton Telecom Services, L.L.C.

Sworn and subscribed before me this 23rd day of July, 2026.



Notary Public

My commission expires 6/24/2029

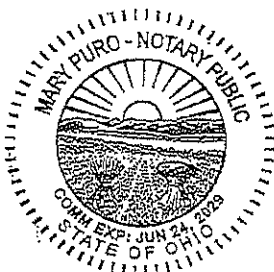


Exhibit A

Diagram showing ownership structure of Transferee

RSTN Communications LLC
Pre-Transaction Organizational Chart

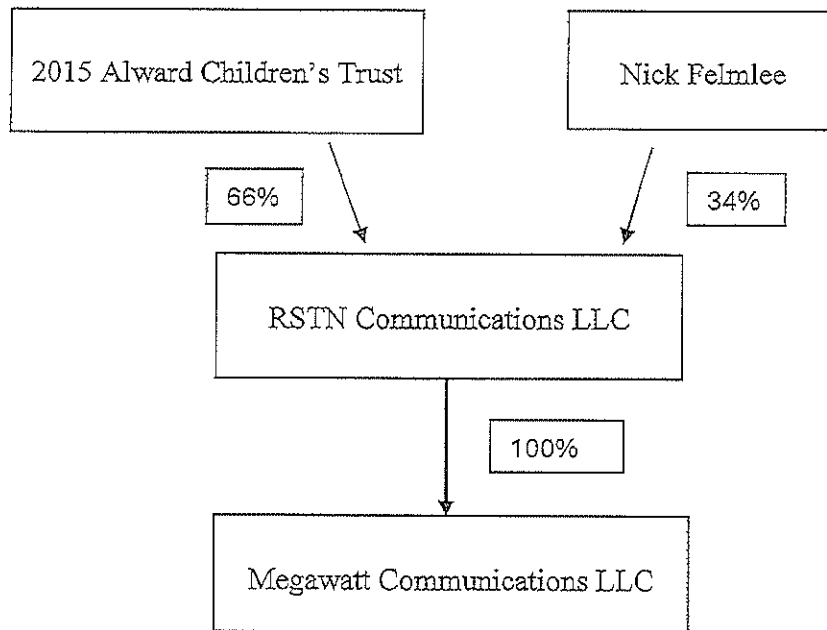


Exhibit B

Professional background of Messrs. Alward and Feimlee

Kevin Alward - Biography

Kevin Alward is the Owner and CEO of International Telcom, LLC, (now known as RingSquared Telecom, LLC) and focuses on delivering impactful business solutions and finding new and effective ways to connect brands with their customers. Ringsquared Telcom brands currently include Kall8 and Dial800, which serve over 20,000 companies internationally. Kevin has proudly spent the past 30 years leading numerous communications companies who serve a variety of industries including enterprise, finance, government and technology.

Kevin holds a Bachelor of Science degree in computer science from Alfred University. Outside of work, Kevin enjoys giving his time to the Villanova Center of Innovation, Creativity and Entrepreneurship (ICE), Oasis, Boy Scouts of America, Keep Our Police Safe (KOPS), Highlands Hockey Association and It's a Wonderful Life.

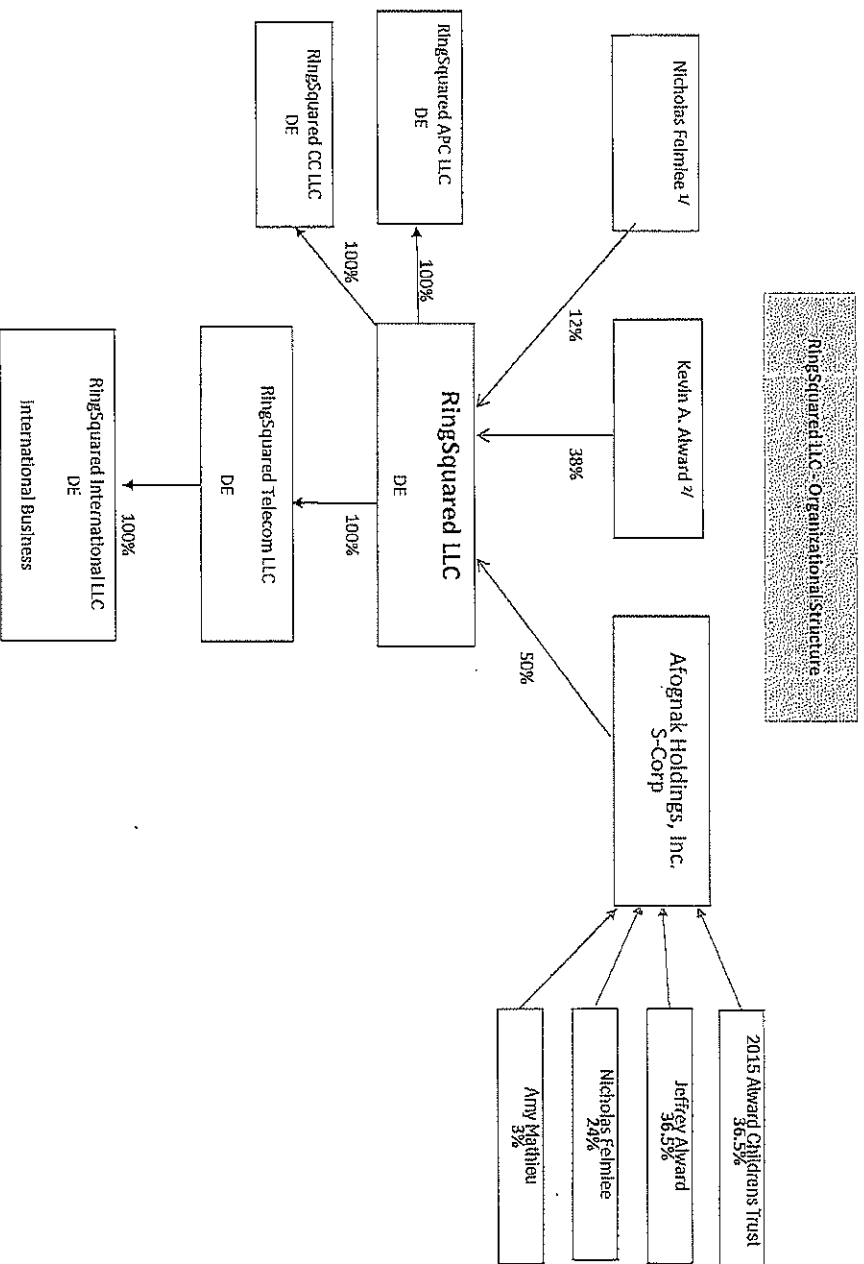
2016 - present: CEO of International Telcom, LLC (now known as RingSquared Telecom, LLC)
2006 - 2018: CEO of SwiftReach Networks
2002 - 2006: President of Covista Communications
1998 - 2001: President of NA Destia Communications f/k/a Econophone USA President of
1988 - 1998: TotalTel USA

Nicholas Felmlee Management Bio

Nicholas Felmlee has extensive telecommunications technical and managerial experience as a senior officer in a variety of telecommunications companies. After graduating from Penn State with a degree in Electrical Engineering in 1997, Nick began working at Lucent Technologies/Bell Labs in 1997. In 2000, he created SwiftReach Networks and ran that company as its owner and Chief Technical Officer until 2018. Since that time, Nick has guided the growth of several RingSquared brands, including Kall8 and Dial 800. He has been an integral team member at RingSquared and will continue to play a critical role after the acquisition of Megawatt.

Exhibit C

Diagrams showing the ownership structure of RingSquared and its subsidiaries

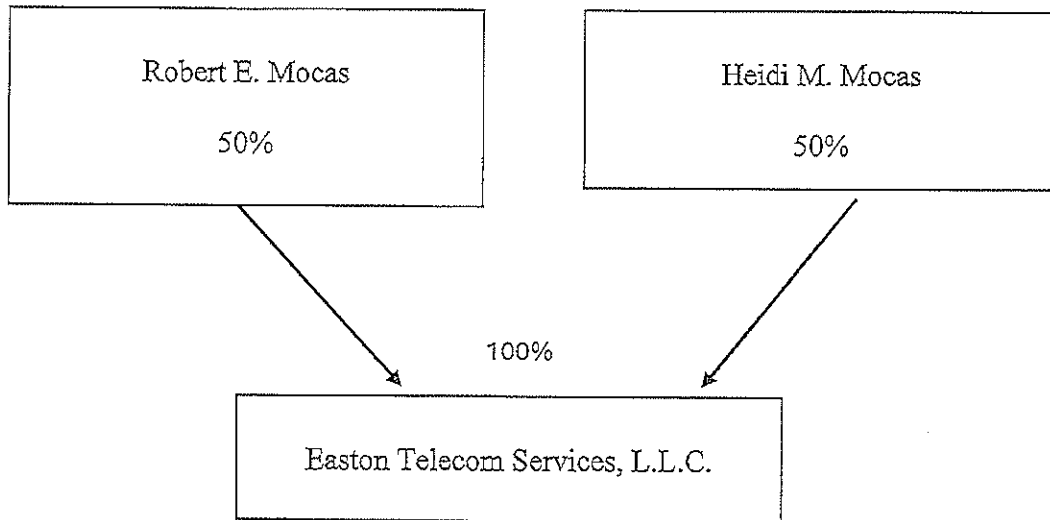


- 1/ Nicholas Feinlee is in the process of transferring his interest in Ringsquared, LLC into an Irrevocable living trust he created for estate planning purposes. Nicholas Feinlee will be the Trustee of the trust
- 2/ Kevin Alward is in the process of transferring his interest in Ringsquared, LLC into an Irrevocable living trust he created for estate planning purposes. Kevin Alward will be the Trustee of the trust.

Exhibit D

Diagrams of the pre- and post- Transaction corporate ownership structure of Licensee

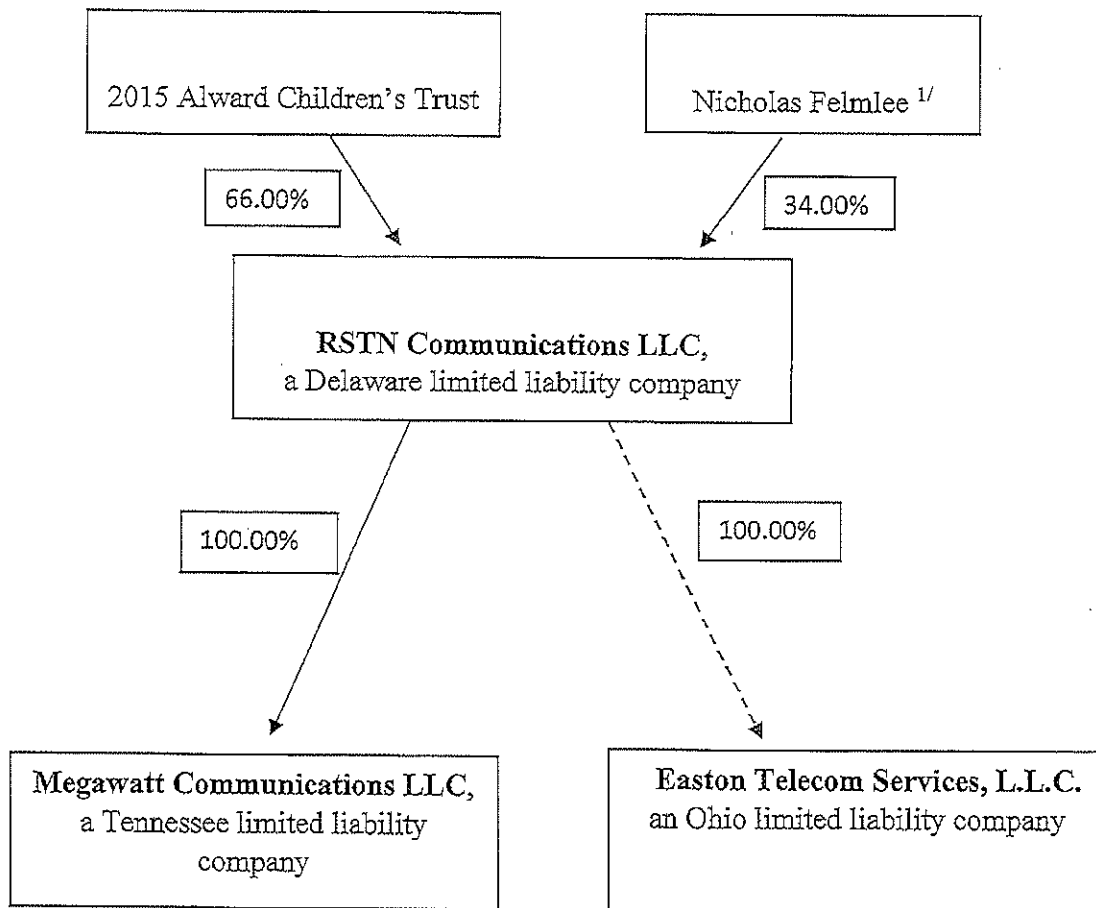
Easton Telecom Services, L.L.C.
Pre-Transaction Organizational Chart



RSTN Communications LLC

Post Transaction Organizational Chart

1



^{1/} Nicholas Felmlee is in the process of transferring his interest in RSTN Communications into the revocable living trust he created for estate planning purposes. Nicholas Felmlee will be the Trustee of the trust.