

Application for Consent to Transfer of Control of International 214 Authorized Carriers

I. INTRODUCTION

The Estate of Martin J. Tibbitts (“Transferee” or “Applicant”) hereby requests approval of the Federal Communications Commission (“FCC” or “Commission”) pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, and Section 63.24 of the Commission’s Rules, 47 C.F.R. § 63.24, to the involuntary international 214 transfer of control of the following companies (“Licensees”) from Martin J. Tibbitts (“Transferor”):

1. Business Network Long Distance, Inc., a Nevada corporation;
2. Network Service Billing, Inc., a Nevada corporation;
3. Nationwide Long Distance Service, Inc., a Nevada corporation;
4. Integrated Services, Inc., a Nevada corporation;
5. Communications Network Billing, Inc., a Nevada corporation;
6. Multiline Long Distance, Inc., an Ohio corporation;
7. National Access Long Distance, Inc., a Nevada corporation;
8. Conectado, Inc., a dissolved Nevada corporation; and
9. LCR Telecommunications, LLC, a Michigan limited liability company.

For the reasons stated herein, Applicant respectfully submits that this Application is subject to the Commission’s “streamlined” processing rules found in Section 63.12 of the Commission’s Rules, 47 C.F.R. § 63.12, and thus prompt approval can be accomplished because there are no competitive concerns that could delay Commission approval of the transfer. Applicant will submit a separate joint application with respect to domestic 214 authority.

II. DESCRIPTION OF THE TRANSACTION

On April 14, 2017, Transferor filed international 214 transfer of control applications seeking consent from the Commission to acquire 100% interests in each of the Licensees, except National Access Long Distance, Inc., from various individuals.¹ An international 214 transfer of control application for National Access Long Distance, Inc. was subsequently filed on February 22, 2018.² The Commission accepted each international 214 transfer of control application under streamlined processing procedures,³ and ultimately granted each of the applications.

On July 20, 2018, Transferor unexpectedly passed away. The Wayne County (Michigan) Probate Court appointed Belinda G. Tibbitts as Special Personal Representative of the Estate of

¹ See File Nos. ITC-T/C-20170417-00071; ITC-T/C-20170417-00080; ITC-T/C-20170417-00077; ITC-T/C-20170417-00075; ITC-T/C-20170417-00076; ITC-T/C-20170417-00078; and ITC-T/C-20180222-00041.

² File No. ITC-T/C-20180222-00041.

³ *Streamlined International Applications Accepted for Filing*, Public Notice, Report No. TEL-01859S (Jul. 28, 2017); *Streamlined International Applications Accepted for Filing*, Public Notice, Report No. TEL-01918S (Jul. 27, 2018).

Martin J. Tibbitts, the Transferee in this Application, on July 26, 2018.⁴ Transferor's interest in each of the Licensees has been transferred to the Estate.

Transferee has seamlessly continued the provision of services to customers through Licensees without any immediate changes with respect to their service offerings, rates, or terms and conditions of service. Approval of the transfer serves the public interest. The transfer has ensured that affected customers enjoy continuity of high-quality telecommunications service. The transfer has been transparent to Transferor's customers, and, consequently, has not had a negative impact on the public interest, consumers, or competition.

III. ANSWER TO QUESTION 10

§ 63.18(c) – Contact Information for Transferor and Transferee:

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Mark C. DeSantis, Esq.
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Arlington, VA 22209
(703) 812-0478
Legal Counsel

With a copy to:

The Estate of Martin J. Tibbitts
Belinda G. Tibbitts, Special Personal Representative
714 Grand Marais Street
Grosse Pointe, MI 48230
(248) 353-7620

§ 63.18(d) – Section 214 Authority

Each Licensee has previously received international Section 214 authorizations to provide resold and facilities-based services international services. Each Licensee also holds domestic 214 authority pursuant to Section 63.01 of the Commission's Rules. Transferee has not previously received international or domestic Section 214 authorizations.

IV. ANSWER TO QUESTION 13

A description of the transfer is provided in Section II, *supra*.

V. REQUEST FOR STREAMLINED PROCESSING

⁴ See Letters of Authority for Special Personal Representative, State of Michigan Probate Court County of Wayne, File No. 2018-840033-DE.

Applicant requests streamlined processing pursuant to Section 63.12 of the Commission's Rules, 47 C.F.R. § 63.12. The Licensees are U.S. carriers that have no affiliation with, and that themselves are not, a foreign carrier in any particular country, and would presumptively be considered non-dominant for the provision of international communications services pursuant to Section 63.10(a)(1) of the Commission's rules, 47 C.F.R. § 63.10(a)(1). Licensees provide international service solely through the resale of an unaffiliated U.S. facilities-based carrier's international switched services (either directly or indirectly through the resale of another U.S. resale carrier's international switched services) and would also presumptively be classified as non-dominant for the provision of international service pursuant to Section 63.10(a)(4) of the Commission's rules, 47 C.F.R. § 63.10(a)(4). Accordingly, Applicant qualifies for the streamlined processing procedures under Sections 63.12(a) & (b) of the Commission's rules, 47 C.F.R. §§ 63.12(a) & (b).