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## VIA THE ELECTRONIC INTERNATIONAL FILING SYSTEM

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: Notification of *Pro forma* Transfer of Control of International Section 214  
Authorizations Held by Loretto Communication Services, Inc. to Loretto  
Telephone Company, Inc.  
International Bureau File No.: ITC-214-20040726-00304**

Dear Ms. Dortch:

Pursuant to Sections 63.24(d) and (f) of the Rules of the Federal Communications Commission (“FCC” or the “Commission”), 47 C.F.R. §§ 63.24(d) and (f), Loretto Communication Services, Inc. (“Loretto Communication” or “Transferor”) hereby notifies the Commission of the December 30, 2020 consummation of the *pro forma* transfer of control of the international Section 214 authority held by Loretto Communication to Loretto Telephone Company, Inc. (“Loretto Telephone” or “Transferee”).<sup>1</sup> As described below, the transactions described herein did not result in change in the ultimate ownership, or actual control or management of Loretto Communication.

Loretto Communication received authority from this Commission on August 27, 2004, to provide global or limited global resale service (ITC-214-20040726-00304). Loretto Communications also provides interstate, interexchange long distance services by virtue of the blanket domestic Section 214 authorization granted by Section 63.01 of the Commission's Rules, 47 C.F.R. § 63.01.

Prior to the transactions described herein, both Loretto Telephone and Loretto Communication were wholly owned subsidiaries of LTC Holding Company, Inc. (“LTC Holding”). LTC Holding was a wholly owned subsidiary of SkyBest Holding Company, LLC (“SkyBest Holding”). SkyBest Holding was a wholly owned subsidiary of SkyBest Communications, Inc. (“SkyBest Communications”), a wholly owned subsidiary of SkyLine

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<sup>1 1</sup> A *pro forma* post transaction notice has also been filed with the FCC's Wireline Competition Bureau.

Telephone Membership Corporation (“SkyLine”). SkyLine is a North Carolina member owned cooperative.

As part of a larger corporate reorganization, LTC Holding and SkyLine Holding were dissolved. Prior to such dissolution, LTC Holding transferred and assigned all of issued and outstanding shares of capital stock of Loretto Communication to Loretto Telephone, making Loretto Communication a direct subsidiary of Loretto Telephone. Upon the subsequent dissolution of LTC Holding and SkyBest Holding, Loretto Telephone became a direct subsidiary of SkyBest Communications. There was no change in the ownership of SkyBest Communications or Skyline.

LTC Holding and SkyBest Holding were intermediate holding companies with no operations or regulatory licenses. The corporate reorganization had no impact on the facilities, operations, management or ultimate control of Loretto Communications or Loretto Telephone and was invisible to customers.

As required under 47 C.F.R. § 63.24(f)(2)(i) for carriers subject to a *pro forma* transfer of control, the Parties provides the following information requested in Sections 63.18-(a)-(d) and (h) for the transferee:

**(a) Section 63.18(a) - THE NAME, ADDRESS AND TELEPHONE NUMBER OF THE TRANSFEREE:**

Loretto Telephone Company, Inc.  
136 S Main Street  
P.O. Box 130  
Loretto, TN 38469  
Telephone: (931) 853-6015

**(b) Section 63.18(b) - THE STATE UNDER THE LAWS OF WHICH EACH CORPORATE APPLICANT IS ORGANIZED:**

Loretto Telephone is a corporation organized under the laws of the state of Tennessee.  
Loretto Communication is a corporation organized under the laws of the state of Tennessee.

**(c) 47 C.F.R. § 63.18(c) - ANSWER TO QUESTION 10:**

The name, title, post office address and telephone number of the officer to whom correspondence concerning the application is to be addressed:

Kimberly M. Shepherd, as Chief Executive Officer  
Loretto Telephone Company, Inc.  
136 S Main Street  
P.O. Box 130  
Loretto, TN 38469  
Telephone: (931) 853-6015  
E-mail: kim.shepherd@skyline.org

Kimberly M. Shepherd, as Chief Executive Officer  
Loretto Communication Services, Inc.  
136 S Main Street  
P.O. Box 130  
Loretto, TN 38469  
Telephone: (931) 853-6015  
E-mail: kim.shepherd@skyline.org

With a copy to counsel:

Mark D. Wilkerson, Esq.  
Wilkerson & Bryan, P.C.  
405 South Hull Street  
Montgomery, Alabama 36104  
Telephone: (334) 265-1500  
Facsimile: (334) 265-0319  
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**(d) 47 C.F.R. § 63.18(d) – ANSWER TO QUESTION 10:**

A statement regarding previously received authority under Section 214 and a general description of the facilities and services authorized:

Loretto Telephone holds blanket domestic Section 214 authority to provide domestic telecommunications services. Loretto Communication holds blanket domestic Section 214 authority to provide domestic telecommunications services and has existing authority under Section 214 to provide global or limited global resale service pursuant to Section 63.18(e)(2). *See* File No. ITC-214-20040726-00304.<sup>2</sup>

**(e) 47 C.F.R. § 63.18(h) – ANSWER TO QUESTION 11:**

The name, address, citizenship and principal place of business of any person or entity that directly or indirectly owns at least ten percent of the equity of the applicant, and the percentage of equity owned by each of those entities (to the nearest one percent). The applicant shall also identify any interlocking directories with a foreign carrier.

Loretto Telephone, a Tennessee corporation, owns one hundred percent (100%) of the issued and outstanding shares of capital stock of Loretto Communications, and Loretto Telephone has become a wholly owned subsidiary of SkyBest Communications. SkyBest

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<sup>2</sup> SkyBest Communications offers international toll telecommunications services pursuant to ITC 214-20000328-00157 and section 214 authority to provide domestic resold toll telecommunications services. SkyLine holds blanket domestic section 214 authority to provide domestic telecommunications services.

Communications is a wholly owned subsidiary of SkyLine, a member owned cooperative. No person or other entity owns more than ten percent (10%) of equity of Skyline.

Kimberly M. Shepherd, as Chief Executive Officer  
Loretto Telephone Company, Inc.  
136 S Main Street  
P.O. Box 130  
Loretto, TN 38469  
E-mail: kim.shepherd@skyline.org

Neither Loretto Telephone nor Loretto Communication have ownership or control over any provider of domestic or international telecommunications services other than the entities identified in this application.

**(f) 47 C.F.R. § 63.18(h) – ANSWER TO QUESTION 12:**

Neither Loretto Communication nor Loretto Telephone is a foreign carrier, and neither is affiliated with a foreign carrier.

**(g) ANSWER TO QUESTION 13:**

Provide a narrative of the means by which the proposed transfer of control will take place.

A downstream subsidiary of SkyLine, LTC Holding, transferred all of the outstanding capital stock (totaling three hundred fifty-four (354) shares of common stock) of Loretto Communication to another LTC Holding subsidiary, Loretto Telephone. As a result of this transaction, Loretto Communication became a wholly owned subsidiary of Loretto Telephone. Both LTC Holding and its immediate parent, SkyBest Holding, were subsequently dissolved, resulting in Loretto Telephone becoming a direct subsidiary of SkyBest Communications, which in turn is a wholly owned subsidiary of Skyline. The corporate reorganization had no impact on the facilities, operations, management or ultimate control of Loretto Communications or Loretto Telephone.

The corporate restructuring is *pro forma* in nature, and the entities will continue to provide the same services, utilizing the same facilities and employees, and customers will see no changes on their bills. The restructuring will be transparent to Loretto Communication's customers, and there will be no change in the rates and other terms and conditions of the services available to customers.

As required under 47 C.F.R. § 63.24(f)(2)(ii) for carriers subject to a *pro forma* transfer of control, the subsidiaries each hereby certified that the assignment of their international Section 214 authorizations from Loretto Communication to Loretto Telephone was *pro forma*, and that, together with all previous *pro forma* transactions, does not result in a change to the actual controlling party.

Please direct any questions concerning this matter to my office.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Mark D. Wilkerson', with a long, sweeping horizontal stroke extending to the right.

Mark. D. Wilkerson  
Kristen M. Beavers  
WILKERSON & BRYAN, P.C.  
405 South Hull Street  
Montgomery, AL 36104  
*Attorneys for Skyline Telephone  
Membership Corporation*

cc: Kimberly M. Shepherd