

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

In the Matter of)	
)	
Troy Cablevision, Inc. and)	WC Docket No. _____
Union Springs Telephone Company, Inc.,)	
Transferors)	ITC-T/C – 2021- _____
)	
and)	
)	
Telapex, Inc.,)	
Transferee)	
)	
Joint Application for Transfer of Control of)	
Domestic 214 Authorization of Troy Cablevision,)	
Inc., and International 214 Authorization of its)	
wholly owned Subsidiary, Union Springs)	
Telephone Company, Inc., to Telapex, Inc.)	
pursuant to Section 214 of the Communications)	
Act of 1934, as Amended)	

**JOINT APPLICATION FOR TRANSFER OF CONTROL OF DOMESTIC AND
INTERNATIONAL SECTION 214 AUTHORIZATIONS**

Troy Cablevision, Inc., d/b/a Troy Cable (“Troy Cable”) and its wholly owned subsidiary, Union Springs Telephone Company, Inc. (“USTC” collectively with Troy Cable, the “Transferors”)¹ and Telapex, Inc. (“Telapex” or “Transferee”) (collectively, Troy Cable, USTC, and Telapex are the “Applicants”), hereby respectfully request authority from the Federal Communications Commission (“FCC” or the “Commission”) for the transfer of control of the domestic Section 214 authorization held by Troy Cable and the international Section 214 authorization held by USTC to Telapex to acquire control of Troy Cable and USTC (the

¹ Troy Cable is owned directly by several individuals and trusts; none of which own a 50 percent or greater interest in Troy Cable. For purposes of this application, Troy Cable and USTC are the Transferors.

“Transaction”).² Pursuant to a stock purchase agreement, Telepak Networks, Inc. (“Telepak Networks”), a wholly owned subsidiary of Telapex, will purchase all of the issued and outstanding stock of Troy Cable, which owns all of the issued and outstanding stock of USTC. Accordingly, this Joint Application (the “Application”) is being filed pursuant to Section 214(a) of the Communications Act of 1934, as amended (the “Act”),³ and Sections 1.763, 63.04, 63.18, and 63.24 of the Commission’s Rules.⁴ The Applicants respectfully request streamlined, expedited treatment of this application pursuant to FCC Rule Sections 63.03 and 63.12.⁵

As described in more detail herein, the proposed Transaction will promote the public interest by enabling Telapex to expand its offerings and services to a broader customer base. Further, the proposed Transaction will be seamless to consumers and will not result in any discontinuance or impairment of either Troy Cable or USTC service offerings.

In support of the filing, Applicants provide the following information.

I. APPLICANTS

A. Troy Cablevision, Inc.

Troy Cable (FRN 0005017298), the domestic 214 authorization holder, is a corporation organized under the laws of Alabama. Its address is 1006 S. Brundidge Street, Troy, AL 36081. Troy Cable is an internet service provider, video provider, and competitive local exchange carrier (“CLEC”) operating in south central Alabama. Troy Cable is owned by six (6) individuals, three (3) trusts, and one (1) decedent’s estate. William H. Freeman and Vicki F. McPherson each hold

² Troy Cable and USTC also hold receive-only earth station registrations that are not the subject of this Application. Pursuant to Section 25.119(j) of the Commission’s rules, Applicants will notify the Commission of consummation of the Transaction no later than 30 days after the transfer of the receive-only earth station registrations to Telapex.

³ 47 U.S.C. § 214.

⁴ 47 C.F.R. §§§§ 1.763, 63.04, 63.18 and 63.24.

⁵ 47 C.F.R. §§ 63.03 and 63.12.

31.2384% of Troy Cable’s shares. The estate of William Harold Freeman, Sr. holds 11.894% of the shares. No other party holds more than ten percent (10%) and no single party holds a controlling interest in the company. Troy Cable previously received universal service high-cost support under Study Area Code (“SAC”) 259025 with the last disbursement received April 2021. Troy Cable is a Rural Digital Opportunity Fund (“RDOF”) (Auction 904) winning bidder in which it has a pending long-form application requesting authorization for support by the Commission.⁶

B. Union Springs Telephone Company, Inc.

USTC (FRN 0003731940), the international 214 authorization holder and wholly owned subsidiary of Troy Cable, is a corporation organized under the laws of Alabama. Its address is P.O. Box 272, Union Springs, AL 36089. USTC is authorized by the Alabama Public Service Commission to provide local exchange telephone service as the incumbent local exchange carrier (“ILEC”) serving Bullock County, Alabama. USTC received authority from the FCC to provide individual switched resale service (ITC-214-19960207-00059).⁷ USTC currently receives universal service high-cost support in the Commission’s Alternative Cost America Model II support program (“ACAM II”) and in the Connect America Fund (“CAF”) ICC support mechanism, under SAC 250322.

⁶ See *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes; Winning Bidders Announced*, AU Docket No. 20-34, WC Docket No. 19-126, WC Docket No. 10-90, Public Notice, 35 FCC Rcd 13888, 13923, Attach. A (Winning Bidder Summary) (WCB/OEA 2020).

⁷ The original holder of the International Section 214 Authorization, Ropir Communications, Inc. (RoComm) notified the FCC on January 22, 2021, of the *pro forma* assignment of the International Section 214 Authorization (ITC-214-19960207-00059) from RoComm to USTC, effective December 31, 2020.

C. Telapex, Inc.

Telapex is a corporation organized under the laws of Mississippi. Its address is 1018 Highland Colony Parkway, Suite 700, Ridgeland, MS 39167. Telapex has six wholly owned subsidiaries that provide telecommunications services, as follows:

Telepak Networks is a corporation organized under the laws of Mississippi. Its address is 1018 Highland Colony Parkway, Suite 700, Ridgeland, MS 39167. Telepak Networks is a facilities-based CLEC that provides telecommunications services in the state of Mississippi. Telepak Networks provides broadband services, telecommunications services, and video services to commercial and retail customers.

Callis Communications, Inc. (“Callis”) is a corporation organized under the laws of Alabama. Its address is 1018 Highland Colony Parkway, Suite 330, Ridgeland, MS 39167. Callis is a CLEC that provides facilities-based and resale competitive local exchange and long distance resale telecommunications services within the State of Mississippi.

Cellular South, Inc. (“C Spire”) is a corporation organized under the laws of Mississippi. Its address is 1018 Highland Colony Parkway, Suite 330, Ridgeland, MS 39167. C Spire’s wholly owned subsidiary, Cellular South Licenses, LLC (“Cellular South”), is licensed by the Commission to provide commercial mobile radio service throughout most of the state of Mississippi, as well as portions of Tennessee, Alabama, and Florida. Cellular South currently receives legacy high-cost (frozen) universal service support as a Competitive Eligible Telecommunications Carrier (“CETC”) in Alabama under SAC 259004, and in Mississippi under SAC 289001.

Franklin Telephone Company, Inc. (“FTC”) is a corporation organized under the laws of Mississippi. Its address is 1121 W. Main Street, Ackerman, MS 39735. FTC is an incumbent local exchange provider of legacy and advanced telecommunications services in twenty-six (26) rural

Mississippi counties. FTC provides traditional voice services as well as high-speed internet via DSL and fiber optic technologies, VoIP, security and home automation products, and IP TV to consumers and businesses in its service areas. FTC currently receives universal service high-cost support in the Commission's ACAM and the CAF ICC support mechanism under SAC 280454.

Other than FTC, neither Telapex or any other affiliate of Telapex receives high-cost support from the Commission.

Harbor Communications, LLC ("Harbor Communications") is a limited liability company organized under the laws of Alabama. Its address is 1509 Government Street, Suite 300, Mobile, AL 36604. Harbor provides a range of voice and data unified telecommunications services to consumers and businesses on the Alabama Gulf Coast through a robust all-fiber optic infrastructure.

Teklinks, Inc. ("Teklinks") is a corporation organized under the law of Alabama. Its address is 201 Summit Parkway, Birmingham, AL 35209. Teklinks is a managed solutions provider that offers advanced connectivity cloud, software, hardware, communications, professional services, cybersecurity, business continuity, and technology support.

II. REQUEST FOR STREAMLINED TREATMENT OF APPLICATION

The Applicants respectfully request streamlined treatment of this Application pursuant to Sections 63.03, 63.10, and 63.12 of the Commission's Rules, specifically, Section 63.03(b)(2)(i) and (iii) as demonstrated below. With respect to the request to transfer domestic authority, this Application is eligible for streamlined processing pursuant to Section 63(b)(2)(i) because "[n]either of the applicants is dominant with respect to any service."

The Commission's definition of "dominant," as set forth in Section 61.3(q) of the Commission's Rules, is "to have market power (i.e., power to control prices)." None of the

Applicants, which face substantial competition from other telecommunications providers, can control the price of their service offerings, nor can they constrain competitors from seeking to induce any of the Applicants' customers to switch to competitors. Moreover, none generate profit levels that demonstrate any dominant market power. Therefore, none of the Applicants should be considered "dominant" for purposes of determining whether this Joint Application qualifies for streamlined treatment pursuant to the Commission's Rules.

This application is presumptively entitled to streamlined procedures pursuant to Section 63.03(b)(2)(iii) of the Commission's Rules. Streamlined treatment is appropriate in this situation because the proposed transaction will have no adverse effect on local competition, and will not negatively affect the national competitive marketplace. The subject transaction involves only a sale of equity interests to a qualified operator, and customers will continue to receive services at the same rates, under the same terms and conditions, and in the same geographic areas as currently offered by Troy Cable and USTC. These factors, together with the absence of any novel questions of law, fact or policy, render this application suitable for streamlined treatment. This Joint Application satisfies Section 63.03(b)(2)(iii) of the Commission's Rules because, (i) combined, the two providers of exchange service, FTC and USTC, serve fewer than two (2) percent of the nation's subscriber lines installed in the aggregate nationwide, and (ii) the transaction will result in no overlapping or adjacent telecommunications service areas of these two companies.

In addition, this Joint Application qualifies for streamlined processing pursuant to subsections (a) and (b) of § 63.12 of the Commission's Rules, 47 C.F.R. §§ 63.12(a), 63.12(b), because (1) the Transferee is not affiliated with a foreign carrier in any destination market; and (2) the Transferee does not have any affiliation with a dominant U.S. carrier who's international switched or private line services the applicant seeks authority to resell (either directly or indirectly through the resale of another reseller's services). Accordingly, streamlined treatment is warranted.

III. DESCRIPTION OF THE TRANSACTION

On October 12, 2021, the owners of all of the issued and outstanding shares of common stock of Troy Cable and Telepak Networks entered into a Stock Purchase Agreement pursuant to which Telepak Networks will acquire for certain consideration all of the issued and outstanding shares of common stock of Troy Cable.

As a result of the Transaction, Telapex, through its wholly-owned subsidiary Telepak Networks, will indirectly own one hundred percent (100%) of the equity interests of, and thus control, Troy Cable, which will continue to own one hundred percent (100%) of the equity interests of USTC. Consummation of the Transaction is contingent upon, among other things, receipt of all necessary regulatory approvals.

IV. PUBLIC INTEREST STATEMENT

The proposed Transaction furthers the public interest, convenience, and necessity. Approval of the Transaction will enable Telapex to expand its offerings and services to a broader customer base; ultimately strengthening its competitive position to the benefit of consumers and the communications marketplace.

Furthermore, the proposed transfer of control of Troy Cable and USTC will be transparent to their current customers. Specifically, the proposed Transaction will have no adverse impact on any customers and will not alter their service or billing. Customers will continue to receive the same services they currently receive. The Transaction will not result in any immediate change of carrier for customers or any assignment of authorizations and will not result in the discontinuance, reduction, loss, or impairment of service to customers. Accordingly, customer notice is not required under Section 64.1120(e) of the Commission's rules because there will be no change in service provider from the customer's perspective.

Following consummation of the Transaction, both Troy Cable and USTC will continue to provide high-quality communications services to their customers in the same geographic areas as currently provided, without interruption.

Finally, the Transaction does not present any anticompetitive issues. After consummation of the Transaction, Applicants' total share of the interstate interexchange market will be less than ten percent (10%), and there are many other interexchange and international carriers operating on a nationwide basis from which both residential and business customers can choose.

The Transaction will serve the public interest by enhancing Telapex's strengths without any threat of anticompetitive effects or other public interest harms. Moreover, the Transaction will be transparent to consumers. The Commission should therefore approve the proposed Transaction.

V. INFORMATION REQUIRED BY SECTION 63.24(e) OF THE COMMISSION'S RULES

The Applicants submit the following information pursuant to Section 63.24(e) of the Commission's rules, which is the information requested in paragraphs (a)-(d) and (o)-(p) of Section 63.18 for all Applicants, and the information requested in paragraphs (h)-(n) of Section 63.18 for Telapex, as the Transferee.

a. Name, contact address, and telephone number.

Domestic and International 214 Holder

Vicki F. McPherson
Troy Cablevision, Inc.
1006 S. Brundidge Street
Troy, AL 36081
334-770-3367 (telephone)
vicki.mcpherson@troycable.com

Jacob T. Cowen
Union Springs Telephone Company, Inc.
1006 S. Brundidge Street

Troy, AL 36081
334-770-3328 (telephone)
jake.cowen@troycable.com

Transferee:

Benjamin C. Pace
Telapex, Inc.
1018 Highland Colony Parkway, Suite 330
Ridgeland, MS 39157
601-974-7151 (telephone)
bp@cpsire.com

b. Citizenship.

Telapex is a Mississippi corporation.
Telepak Networks is a Mississippi corporation
Callis is an Alabama corporation.
C Spire is a Mississippi corporation.
Cellular South Licenses, LLC is a Mississippi limited liability company.
FTC is a Mississippi corporation.
Harbor Communications is an Alabama limited liability company.
Teklinks is an Alabama corporation.

Troy Cable is an Alabama corporation
USTC is an Alabama corporation.

c. Correspondence concerning this Application should be sent to (Answer to IBFS Main Form Question 10):

For Troy Cable and USTC

Mark D. Wilkerson
Kristen M. Beavers
Wilkerson & Bryan, P.C.
405 South Hull Street
Montgomery, AL 36104
Tel: (334) 265-1500
mark@wilkersonbryan.com
kristen@wilkersonbryan.com

For Telapex

David A. LaFuria, Esq.
Lukas, LaFuria, Gutierrez & Sachs, LLP
8300 Greensboro Drive, Suite 1200
Tysons, VA 22102
Tel: (703) 584-8666
dlafuria@fcclaw.com

with a copy to:

Vicki F. McPherson
Troy Cablevision, Inc.

with a copy to:

Benjamin C. Pace
Chief Financial Officer

Union Springs Telephone Company, Inc.
1006 S. Brundidge Street
Troy, AL 36081
vicki.mcpherson@troycable.com

Telapex, Inc.
1018 Highland Colony Parkway, Suite 330
Ridgeland, MS 39157
bpace@cspire.com

d. International Section 214 Authorization (Answer to IBFS Main Form Question 10).

Troy Cable holds blanket domestic Section 214 authority to provide domestic telecommunications services. USTC is authorized to provide international global switched resale services pursuant to the following authorization: ITC-214-19960207-00059.

Telepak Networks, an affiliate of Telapex, is authorized to provide international global switched resale services pursuant to the following authorization: ITC-214-20010125-00027.

Callis, an affiliate of Telapex, is authorized to provide international global switched resale services pursuant to the following authorization: ITC-214-20051216-00504.

C Spire, an affiliate of Telapex, is authorized to provide international global facilities-based and global resale services pursuant to the following authorization: ITC-214-19980630-00447.

Harbor Communications, an affiliate of Telapex, is authorized to provide international global switched resale services pursuant to the following authorization: ITC-214-20020123-00020.

Teklinks, an affiliate of Telapex, is authorized to provide international global switched resale services pursuant to the following authorization: ITC-214-20130221-00059.

e. Ten Percent Or Greater Interest Holders/Interlocking Directorates (Answer to IBFS Main Form Question 11 and Question 12).

Transferor:

Troy Cable is owned by six (6) individuals, three (3) trusts, and one (1) decedent's estate; William H. Freeman and Vicki F. McPherson each hold 31.2384% of Troy Cable's shares. The

estate of William Harold Freeman, Sr. holds 11.894% of the shares. No other party holds a ten percent (10%) or greater direct or indirect ownership interest.

Name and Address	Citizenship	Principal Business	Percent Interest
William H. Freeman P.O. Box 365 Troy, AL 36081-0365	United States	Telecommunications	31.2384%
Vicki F. McPherson P.O. Box 475 Troy, AL 36081-0475	United States	Telecommunications	31.2384%
The Estate of William Harold Freeman, Sr. Executor Vicki F. McPherson P.O. Box 475 Troy, AL 36081-0475	United States	Estate	11.894%

Troy Cable owns one hundred percent (100%) of the issued and outstanding shares of stock of USTC. The address for Troy Cable is 1006 S. Brundidge Street, Troy, AL 36081. The principal business of Troy Cable is telecommunications.

Transferee and Affiliates:

The following entities and individuals hold a ten percent (10%) or greater direct or indirect ownership interest in Telapex (and after consummation of the Transaction, a corresponding indirect ownership interest in Troy Cable and USTC):

The following are the only entities or persons who own at least a ten percent (10%) stock interest in Telapex:

1. James H. Creekmore, Sr. (FRN 0008519530) votes a total of 34.67% of Telapex shares as follows:

- 1. James H. Creekmore, Sr.: 0.66
- 2. JCMC Investments, LP: 1.33
- 3. HCCC Investments, LP: 0.67
- 4. Trust FBO Hubert W. Goings, IV: 1.33
- 5. Trust FBO Meredith L. Goings: 1.33
- 6. JOCM, LP: 0.32
- 7. James H. Creekmore, Sr.
As Trustee of the Catherine E. Creekmore Trust: 0.30
- 8. James H. Creekmore, Jr. Investment Services
Trust: 5.27
- 9. Trustmark National Bank
As Trustee of the Elizabeth Arnold Creekmore

Irrevocable Trust dated 12/21/16:	5.25
10. JMC Blessings, LLC:	16.80
11. James H. Creekmore, Sr. & Meredith W. Creekmore Family Trust:	<u>1.41</u>
TOTAL:	34.67%

The address of James H. Creekmore, Sr. is c/o Telapex, Inc., 1018 Highland Colony Parkway, Suite 700, Ridgeland, MS 39157. James H. Creekmore, Sr. is a United States citizen, and his principal business is telecommunications.

2. *Telapex, Inc. Employee Stock Ownership Plan (FRN 0008519506) votes a total of 13.30% of Telapex shares as follows:*

1. Telapex, Inc. Employee Stock Ownership Plan	<u>13.30%</u>
TOTAL:	13.30%

The address of the Telapex, Inc. Employee Stock Ownership Plan is c/o Telapex, Inc., 1018 Highland Colony Parkway, Suite 700, Ridgeland, MS 39157. It is organized under Mississippi law. Its principal business is Telecommunications.

3. *Elizabeth C. Pickering (FRN 0025204645) votes a total of 10.96% of Telapex shares as follows:*

1. Elizabeth C. Pickering:	8.10
2. Bur, LP:	0.26
3. Tungsten, LLC	0.74
4. Beryl, LLC	0.74
5. Calcite, LLC	0.74
6. Elizabeth C. Pickering GST #1	0.19
7. Elizabeth C. Pickering GST #2	<u>0.19</u>
TOTAL:	10.96%

The address of Elizabeth C. Pickering is c/o Telapex, Inc., 1018 Highland Colony Parkway, Suite 700, Ridgeland, MS 39157. Elizabeth C. Pickering is a United States citizen, and principal business is telecommunications.

4. *Ashley C. Meena (No FRN) votes a total of 10.47% of Telapex shares as follows:*

1. Ashley C. Meena:	7.63
2. VMM, LLC:	0.82
3. Old River II, LLC	0.82
4. Alder II, LLC	0.82
5. Ashley C. Meena GST #1	0.19
6. Ashley C. Meena GST #2	<u>0.19</u>
TOTAL:	10.47%

The address of Ashley C. Meena is c/o Telapex, Inc., 1018 Highland Colony Parkway, Suite 700, Ridgeland, MS 39157. Ashley C. Meena is a United States citizen. Her principal business is telecommunications.

5. Sidney C. Crews (No FRN) votes a total of 10.49% of Telapex shares as follows:

1. Sidney C. Crews:	8.49
2. David Crews (UTMA):	0.01
3. Sagebrush, LP	0.26
4. Hickory C, LLC	0.45
5. Elm C, LLC	0.45
6. Dogwood C, LLC	0.45
7. Sidney C Crews GST #1	0.19
8. Sidney C. Crews GST #2	<u>0.19</u>
TOTAL:	10.49%

The address of Sidney C. Crews is c/o Telapex, Inc., 1018 Highland Colony Parkway, Suite 700, Ridgeland, MS 39157. Sidney C. Crews is a United States citizen, and principal business is telecommunications.

The officers and directors of Telapex are as follows:

Wesley Goings – President, Chairman
Benjamin C. Pace – Chief Financial Officer, Treasurer
Wade H. Creekmore, Jr. – Vice President, Secretary, Director
James H. Creekmore, Sr. – Vice President, Asst. Secretary, Director
Sidney C. Crews – Vice President
Charles L. McBride, Jr. – Senior Vice President – Legal & General Counsel
Meredith W. Creekmore – Director
Victor H. Meena, Jr. – Director
Elizabeth C. Pickering – Director
Tammy Torrey – Director

Other than as set forth in this Application, to Telapex’s knowledge, no other entity or individual will own a ten percent (10%) or greater direct or indirect equity or voting interest in Telapex, Troy Cable, or USTC after consummation of the Transaction.

Telapex holds a ten percent (10%) or greater direct or indirect equity or voting interests in the following telecommunications-related entities. Each of these entities contact address and state of formation is provided in Section 1C. The principal business for each entity is telecommunications.

Callis Communications, Inc. (FRN 0008725491)
Cellular South Licenses, LLC (FRN 0020434767)
Cellular South, Inc. (FRN 0001746221)
Franklin Telephone Company, Inc. (FRN 0001742170)
Harbor Communications, LLC (FRN 0006221287)
Teklinks, Inc. (FRN 0022348106)
Telepak Networks, Inc (FRN 0003806668)

Elizabeth C. Pickering, who owns a 10.96 percent voting interest in Telapex, owns a ten percent (10%) or more interest in the following telecommunications-related entities.

Callis Communications, Inc. (FRN 0008725491)
Cellular South Licenses, LLC (FRN 0020434767)
Cellular South, Inc. (FRN 0001746221)
Franklin Telephone Company, Inc. (FRN 0001742170)
Harbor Communications, LLC (FRN 0006221287)
Teklinks, Inc. (FRN 0022348106)
Telepak Networks, Inc (FRN 0003806668)

Ashley C. Meena, who owns a 10.49 percent voting interest in Telapex, owns a ten percent (10%) or more interest in the following telecommunications-related entities.

Callis Communications, Inc. (FRN 0008725491)
Cellular South Licenses, LLC (FRN 0020434767)
Cellular South, Inc. (FRN 0001746221)
Franklin Telephone Company, Inc. (FRN 0001742170)
Harbor Communications, LLC (FRN 0006221287)
Teklinks, Inc. (FRN 0022348106)
Telepak Networks, Inc (FRN 0003806668)

Sidney C. Crews, who owns a 10.47 percent voting interest in Telapex, owns a ten percent (10%) or more interest in the following telecommunications-related entities.

Callis Communications, Inc. (FRN 0008725491)
Cellular South Licenses, LLC (FRN 0020434767)
Cellular South, Inc. (FRN 0001746221)
Franklin Telephone Company, Inc. (FRN 0001742170)
Harbor Communications, LLC (FRN 0006221287)
Teklinks, Inc. (FRN 0022348106)
Telepak Networks, Inc (FRN 0003806668)

James H. Creekmore, Sr., who owns a 34.67 percent voting interest in Telapex, owns a ten percent (10%) or more interest in the following telecommunications-related entities.

Callis Communications, Inc. (FRN 0008725491)
Cellular South Licenses, LLC (FRN 0020434767)
Cellular South, Inc. (FRN 0001746221)
Franklin Telephone Company, Inc. (FRN 0001742170)
Harbor Communications, LLC (FRN 0006221287)
Teklinks, Inc. (FRN 0022348106)
Telepak Networks, Inc (FRN 0003806668)

Telapex, Inc. Employee Stock Ownership Plan, which owns a 13.58 percent the common stock in Telapex, owns a ten percent (10%) or more interest in the following telecommunications-related entities.

Callis Communications, Inc. (FRN 0008725491)
Cellular South Licenses, LLC (FRN 0020434767)
Cellular South, Inc. (FRN 0001746221)
Franklin Telephone Company, Inc. (FRN 0001742170)
Harbor Communications, LLC (FRN 0006221287)
Teklinks, Inc. (FRN 0022348106)
Telepak Networks, Inc (FRN 0003806668)

Interlocking Directorates: No officer or director of the Applicants is also an officer or director of any foreign carrier. The Applicants do not have any interlocking directorates with a foreign carrier, and it will not have any such directorates after consummation of the Transaction.

f. Foreign Carrier Affiliation Certification (Answer to IBFS Main Form Questions 14-17)

The Applicants hereby certify that neither of them, nor any of their subsidiaries, are a foreign carrier, affiliated with a foreign carrier, and will not become affiliated with a foreign carrier as a result of this Transaction.

g. Foreign Carrier and Destination Countries (Answer to IBFS Main Form Questions 14-17)

Telapex certifies that, upon consummation of the Transaction, neither Telapex, nor its subsidiaries, nor Troy Cable or USTC will provide international telecommunications services to

any destination country in which: (1) they are foreign carriers in the destination market; (2) they control a foreign carrier in the destination market; (3) any entity that owns more than 25% of Telapex, or that controls Telapex, 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% of Telapex and are parties to, or the beneficiaries of, a contractual relationship affecting the provision or marketing of international basic telecommunications services in the United States.

h. WTO Membership of Destination Countries (Answer to IBFS Questions 14-17)

Not applicable.

i. International Telecommunications Services (Answer to IBFS Questions 14-17)

Neither Telapex, nor its affiliates, nor Troy Cable or USTC will resell the international switched services of an unaffiliated U.S. carrier for the purpose of providing international telecommunications services to a country where they are foreign carriers or are affiliated with a foreign carrier.

j. Non-dominant Regulatory Classification (Answer to IBFS Main Form Questions 14-17)

Not applicable.

k. Special Concessions Certification (Answer to IBFS Main Form Question 21)

The Applicants have 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 sufficient market power on the foreign end of the route to adversely affect competition in the U.S. market, and will not enter into such agreements in the future.

l. Federal Benefits/Anti-Drug Act of 1988 Certification (Answer to IBFS Main Form Question 25)

The Applicants certify, pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, that they are not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

m. Eligibility for Streamlined Processing (Answer to IBFS Main Form Question 20)

The Applicants request streamlined processing of this Application pursuant to Sections 63.03, 63.10 and 63.12 of the Commission's rules for the reasons set forth in Section II above.

VI. INFORMATION REQUIRED BY SECTION 63.04(b) OF THE COMMISSION'S RULES FOR TRANSFER OF CONTROL

Pursuant to Commission Rule 63.04(b), Applicants submit the following information in support of their request for domestic Section 214 authority to transfer control of Troy Cable and USTC to Telapex in order to address the requirements set forth in Commission Rule 63.04(a)(6)-(12):

(a)(6) A description of the proposed Transaction is set forth in Section III above.

(a)(7) See Section I above. Collectively, the Applicants provide telecommunications services pursuant to authorizations to provide incumbent local exchange, competitive local exchange, and/or interexchange telecommunications services in Alabama and Mississippi.

(a)(8) Applicants respectfully submit that this Application is eligible for streamlined processing for the reasons set forth in Section II of the Application.

(a)(9) Applicants will be filing separate notices with the Commission for the transfer of control of the earth station registrations held by Troy Cable and USTC that are not the subject of this application.

(a)(10) No party is requesting special consideration because it is facing imminent business failure.

(a)(11) Not applicable; no waiver requests are being sought in conjunction with the

Respectfully submitted,

TROY CABLEVISION, INC



By: William H. Freeman

President
Troy Cablevision, Inc.
1006 S. Brundidge Street
Troy, AL 36081

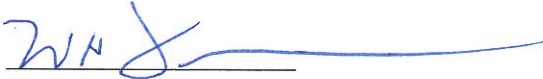
TELAPEX, INC.



Benjamin C. Pace

Chief Financial Officer
Telapex, Inc.
1018 Highland Colony Parkway
Suite 330
Ridgeland, MS 39157

UNION SPRINGS TELEPHONE COMPANY, INC.



By: William H. Freeman

President
Troy Cablevision, Inc.
1006 S. Brundidge Street
Troy, AL 36081

Dated: October 20, 2021

Transaction.

(a)(12) The Transaction is in the public interest for the reasons set forth in Section IV of the Application.

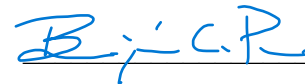
VII. CONCLUSION

For the foregoing reasons, the Applicants respectfully request that the Commission act expeditiously to approve the Transaction.

Respectfully submitted,

TROY CABLEVISION, INC

TELAPEX, INC.



By: William H. Freeman

Benjamin C. Pace

President
Troy Cablevision, Inc.
1006 S. Brundidge Street
Troy, AL 36081

Chief Financial Officer
Telapex, Inc.
1018 Highland Colony Parkway
Suite 330
Ridgeland, MS 39157

UNION SPRINGS TELEPHONE COMPANY, INC.

By: William H. Freeman

President
Troy Cablevision, Inc.
1006 S. Brundidge Street
Troy, AL 36081


Dated: October 20, 2021

DECLARATION OF WILLIAM H. FREEMAN
TROY CABLEVISION, INC.

I, William H. Freeman, President of Troy Cablevision, Inc., do hereby declare under penalty of perjury that the statements made in this Joint Application for Domestic Section 214 Transfer of Control are true and accurate to the best of my knowledge, information and belief.

Dated this 20th day of October, 2021.

TROY CABLEVISION, INC.



By: William H. Freeman
Its: President

DECLARATION OF WILLIAM H. FREEMAN
UNION SPRINGS TELEPHONE COMPANY, INC.

I, William H. Freeman, President of Union Springs Telephone Company, Inc., do hereby declare under penalty of perjury that the statements made in this Joint Application for Domestic Section 214 Transfer of Control are true and accurate to the best of my knowledge, information and belief.

Dated this 20th day of October, 2021.

UNION SPRINGS TELEPHONE COMPANY, INC.



By: William H. Freeman

Its: President

DECLARATION OF BENJAMIN C. PACE
TELAPEX, INC

I, Benjamin C. Pace, Chief Financial Officer of Telapex, Inc., do hereby declare under penalty of perjury that the statements made in this Joint Application for Domestic Section 214 Transfer of Control are true and accurate to the best of my knowledge, information and belief.

Dated this 20th day of October, 2021.

TELAPEX, INC.



Benjamin C. Pace
Chief Financial Officer