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September 23, 2019

VIA IBFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

Re: IBFS File Nos. SES-REG-INTR2018-08810, SES-REG-INTR2018-08816, SES-REG-INTR2018-08805 & SES-REG-INTR2018-08797

Supplement to Applications for Receive-Only Earth Station Registrations of NTS Communications, LLC (formerly known as NTS Communications, Inc.)

Dear Secretary Dortch:

By this letter, NTS Communications, LLC (formerly NTS Communications, Inc.) (the "Registrant") notifies the Commission of a series of transactions that resulted (1) in the conversion of Registrant to a Delaware limited liability company and the resulting change in the Registrant's legal name to "NTS Communications, LLC" and (2) in transfers of indirect control of Registrant to Clarity Telecom, LLC d/b/a Vast Broadband ("Clarity") and subsequently to Python Intermediate II, LLC ("Python" and together with Registrant and Clarity, the "Parties"). This letter is intended to constitute a supplement of the applications for receive-only earth station registrations pending in the above-captioned proceedings.¹

Description of the Parties

A. NTS Communications, LLC (formerly NTS Communications, Inc.)

¹ The Parties obtained approval for the NTS Transaction in connection with other authorizations and licenses held by Registrant in WC Docket No. 19-7; IB File No. ITC-T/C-20190128-00007; and CARS File Nos. CAR-20190207AA-08, CAR-20190207AB-08, CAR-20190221AA-09, & CAR-20190221AB-09. The Parties obtained approval for the Python Transaction in connection with other authorizations and licenses held by Registrant in WC Docket No. 19-16; IB File No. ITC-T/C-20190128-00005; and CARS File Nos. CAR-20190207AC-09 and CAR-20190207AD-09.

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Registrant is a wholly owned subsidiary of NTS Clarity, LLC (formerly NTS, Inc.) ("NTS Parent") together with Registrant and its affiliates, "NTS"), a Delaware limited liability company with no operations of its own. NTS Parent's principal business is serving as a holding and management company providing, through its wholly owned subsidiaries, including Franchisee, integrated communications services which include voice, video, and data over its FTTP and other networks.

Prior to the NTS and Python Transactions (as defined below), NTS Parent was wholly owned by T3, a Nevada corporation, and a direct, wholly owned subsidiary of T3 North Holdings, Inc ("T3 Holdings"), a Delaware corporation, part of a family of funds advised by Tower Three Partners, LLC, an operationally oriented private equity firm that invests in a concentrated portfolio of U.S.-based middle market companies.

B. Clarity Telecom, LLC

Clarity is a telecommunications provider headquartered in Sikeston, Missouri and provides telecommunications services in Minnesota and South Dakota doing business under the brand Vast Broadband. Clarity provides an array of communications, video and broadband services, including digital cable, high speed Internet, and local and long distance phone services.

The direct parent company of Clarity is Clarity Telecom Holdings, LLC ("Clarity Holdings"), a Delaware limited liability company whose primary business is investments in telecommunications companies. Prior to the Python Transaction, Clarity Holdings was majority owned by investment funds managed by Pamlico Capital, including PC III CTH Holdings, L.P. ("PC III CTH"). PC III CTH was formed for the purpose of investments in Clarity Holdings. PC III CTH is majority owned and controlled by funds and entities affiliated with Pamlico Capital.

C. Python Intermediate II, LLC

Python, a Delaware limited liability company, is a newly formed company created for the purpose of acquiring Clarity Holdings. Python is indirectly, wholly owned by Python Holdings, L.P. ("Python Holdings"), an investment fund also created for the purpose of the Python Transaction. Python Holdings is primarily owned and controlled by funds and entities affiliated with Pamlico Capital and Oak Hill Capital Partners, which are private equity funds based in the United States.

Contacts

For the purposes of this filing, contacts are as follows:

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With copies for Python to:

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Description of the Transactions

The Parties notify the Commission of the conversion of Registrant to a Delaware limited liability company, resulting in a change in legal name of Registrant, and two separate transactions that resulted in the transfers of indirect control of Registrant, first to Clarity and subsequently to Python.

First, in connection with the NTS Transaction described below, Registrant converted from a Texas corporation to a Delaware limited liability company effective August 29, 2019.² This conversion changed Registrant's legal name to "NTS Communications, LLC." Registrant requests that Registrant's applications pending in the above-captioned proceedings be revised to reflect its current legal name "NTS Communications, LLC".

Second, on August 30, 2019, and pursuant to the Purchase Agreement, dated as of December 24, 2018, by and among Clarity, T3, and NTS Parent, Clarity acquired all of the outstanding equity interests in NTS Parent (the "NTS Transaction"). As part of the NTS Transaction, and in addition to the conversion of Registrant described above, NTS Parent converted from a

² The conversion was just a change in corporate form and did not entail a merger or other transaction that extinguished the existence of the company.

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corporation to a limited liability company effective August 29, 2019. Upon completion of the NTS Transaction, NTS Parent became a direct, wholly owned subsidiary of Clarity. Registrant remains a direct, wholly owned subsidiary of NTS Parent. Therefore, upon completion of the NTS Transaction, Registrant became an indirect, wholly owned subsidiary of Clarity.

Finally, immediately after closing of the NTS Transaction and pursuant to an Agreement and Plan of Merger dated as of December 24, 2018, a series of mergers and other transactions resulted in Python directly or indirectly owning all of the issued and outstanding equity interests of Clarity Holdings (the "Python Transaction"). Upon completion of the Python Transaction, Clarity Holdings became a wholly owned subsidiary of Python. Clarity and Registrant remained wholly owned subsidiaries of Clarity Holdings and became indirect, wholly owned subsidiaries of Python.

Diagrams depicting the pre-Transactions and current corporate ownership structures of Registrant are provided as **Exhibit A**.

* * * *

Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,



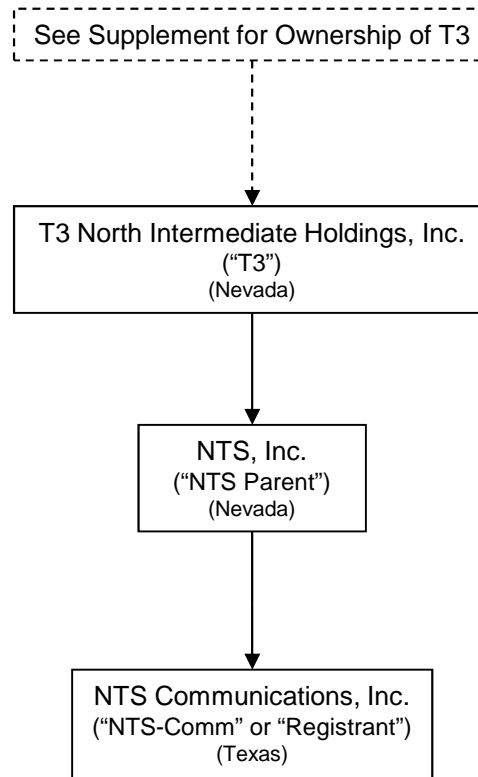
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Counsel for the Parties

EXHIBIT A

Diagrams of the Pre-Transactions and Current Corporate Ownership Structures

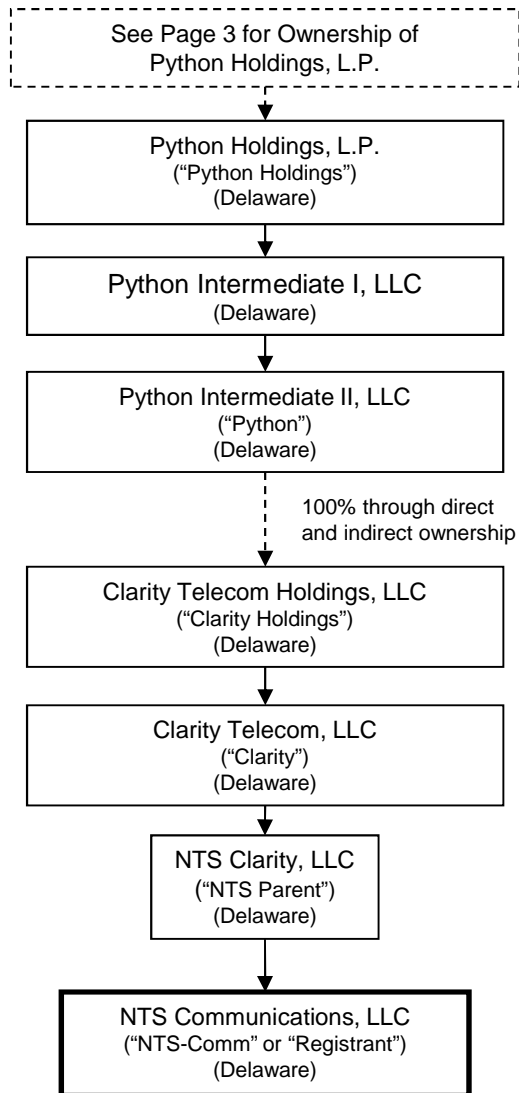
Pre-Transactions Corporate Ownership Structure of Registrant



All ownership/control percentages are 100%, unless noted.

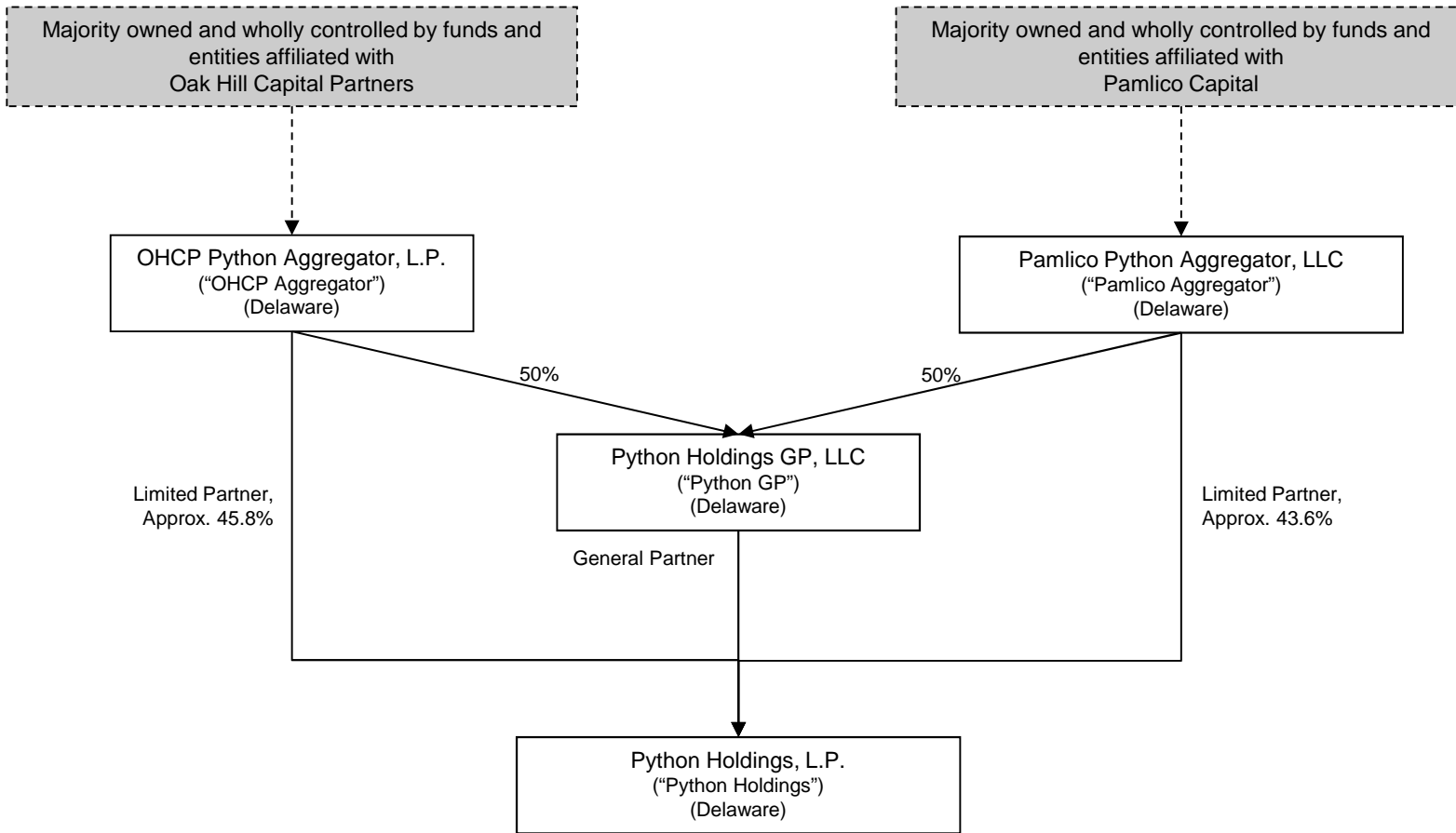
Post-Transactions Corporate Ownership Structure of Registrant*

* The entities listed herein only include Registrant and those entities that are in their chain of ownership.



All ownership/control percentages are 100%, unless noted.

Current Corporate Ownership Structure of Python Holdings



All ownership/control percentages are 100%, unless noted.