

Morgan Lewis

Ronald W. Del Sesto, Jr.

Danielle Burt

ronald.delsesto@morganlewis.com

danielle.burt@morganlewis.com

December 2, 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-INTR2018-08548; SES-REG-INTR2018-08959;
SES-REG-INTR2018-08987**

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

Dear Secretary Dortch:

By this letter, E. Ritter Communications Holdings, LLC (formerly E. Ritter Communications Holdings, Inc.) (the "Registrant") notifies the Commission of (1) the conversion of Registrant to a Delaware limited liability company and the resulting change in the Registrant's legal name to "E. Ritter Communications Holdings, LLC" and (2) the transfer of control of Registrant to Ritter Communications Ultimate Holdings LLC ("Ritter Ultimate").¹ This letter is intended to constitute a supplement of the applications for receive-only earth station registrations pending in the above-captioned proceedings.

Description of the Parties

A. E. Ritter Communications Holdings, LLC (formerly E. Ritter Communications Holdings, Inc.)

Registrant is a Delaware limited liability company with principal offices at 2400 Ritter Drive, Jonesboro, Arkansas 72401. Registrant is a holding company whose operating

¹ The FCC approved the transfer of control in connection with other authorizations and licenses held by Registrant and its wholly-owned subsidiaries. See WC Docket No. 19-239, Public Notice, DA 19-1031 (WCB 2019); IB File Nos. ITC-T/C-20190823-00144 and ITC-T/C-20190823-00145, DA 19-1000 (IB 2019); and ULS File Nos. 0008774472, 0008774476, 0008774489, Public Notice, Report No. 14456 (WTB 2019).

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, NW
Washington, DC 20004
United States

T +1.202.739.3000
F +1.202.739.3001

subsidiaries, including three incumbent independent local exchange company subsidiaries, provide telecommunications services in Arkansas and Tennessee. Registrant also provides cable television and IP-based telephone services outside of its incumbent local telephone services areas through two CLEC subsidiaries and two cable television subsidiaries.

B. Ritter Communications Ultimate Holdings LLC

Ritter Ultimate is a limited liability company organized under the laws of Delaware. Its principal place of business is located at 1900 K Street NW, Suite 1130, Washington, DC 20006. Ritter Ultimate is managed by Grain Management, LLC ("Grain Management"), which invests in and manages communications infrastructure projects in North America.

Contacts

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

Ronald W. Del Sesto, Jr.
Danielle Burt
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Ave, N.W.
Washington, DC 20004-2541
202-739-3000 (tel)
202-739-3001 (fax)
ronald.delsesto@morganlewis.com
danielle.burt@morganlewis.com

with a copy to:

Susan Christian
E. Ritter & Company
2400 Ritter Drive
Jonesboro, AR 72401
Tel: (870) 336-2323
susan.christian@rittercommunications.com

Description of the Conversion and Transfer of Control Transaction

Registrant notifies the Commission of the conversion of Registrant to a Delaware limited liability company, resulting in a change in legal name of Registrant. Registrant converted from an Arkansas corporation to a Delaware limited liability company effective October 28, 2019.² This conversion changed Registrant's legal name to "E. Ritter Communications Holdings, LLC." Registrant requests that Registrant's applications pending in the above-captioned proceedings be revised to reflect its current legal name "E. Ritter Communications Holdings, LLC."

In addition, on October 31, 2019 and pursuant to the terms of the Purchase Agreement dated August 11, 2019, Ritter Ultimate acquired control of Registrant and its wholly-owned subsidiaries. Upon completion of the transfer of control transaction, Registrant became a wholly-owned subsidiary of Ritter Ultimate. A diagram of the post-closing corporate structure of Registrant is provided as **Exhibit 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.

Marlene H. Dortch, Secretary
December 2, 2019
Page 3

* * * *

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

Respectfully submitted,

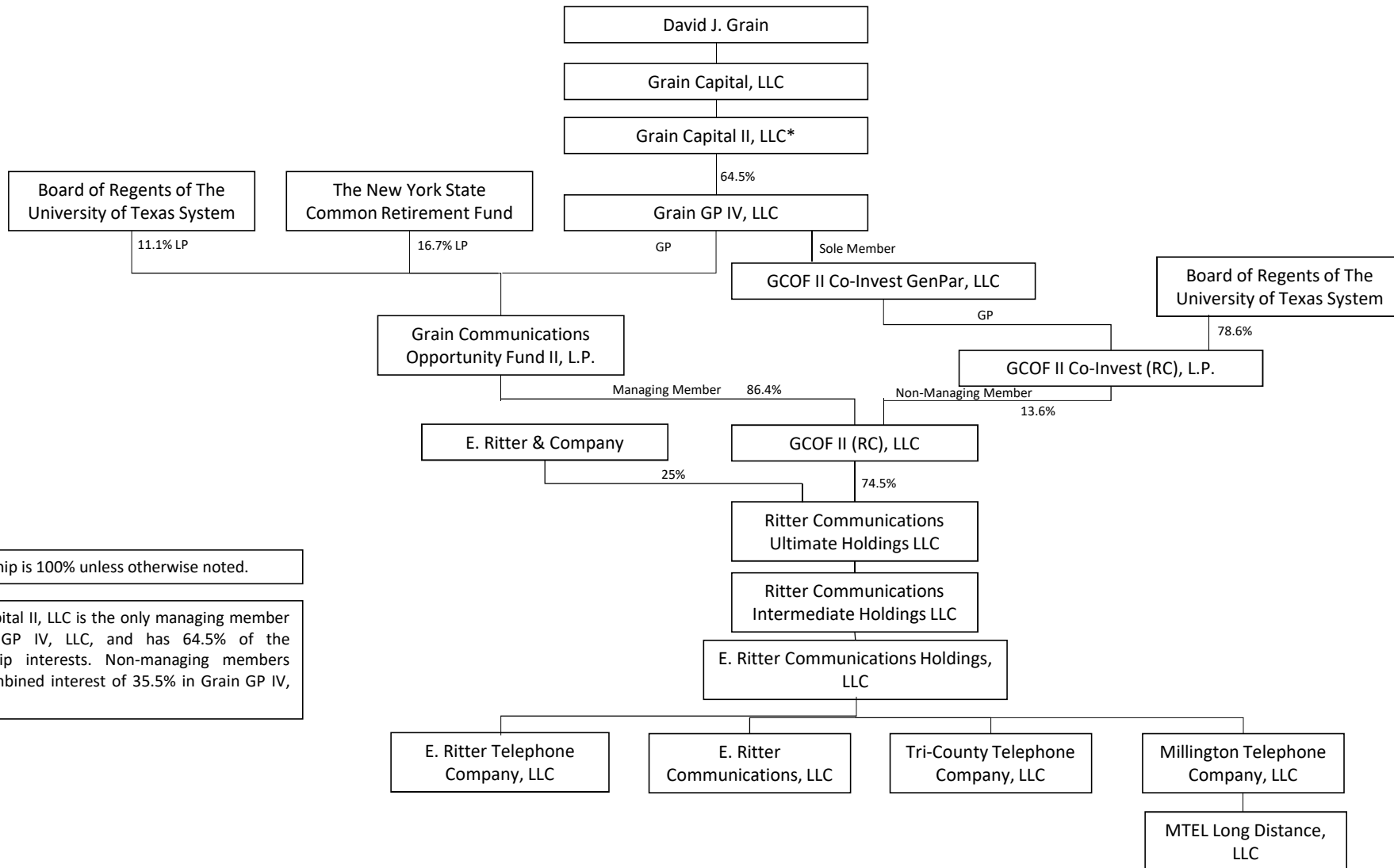
/s/ Danielle Burt

Ronald W. Del Sesto, Jr.
Danielle Burt

Counsel for the Registrant

Exhibit A
Post-Closing Chart

Post-Transaction Ownership Chart



All ownership is 100% unless otherwise noted.

*Grain Capital II, LLC is the only managing member of Grain GP IV, LLC, and has 64.5% of the membership interests. Non-managing members own a combined interest of 35.5% in Grain GP IV, LLC