



ANDREW O. ISAR

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4304 92<sup>ND</sup> AVENUE NW  
GIG HARBOR, WA 98335  
TELEPHONE: 253.851.6700  
FACSIMILE: 866.474.3630  
WWW.MILLERISAR.COM

Via ECFS and IBFS

January 9, 2018

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

ATTN: Bureau Chief, Wireline Competition Bureau  
Bureau Chief, International Bureau

RE: BCN Telecom, Inc. and Network Billing Systems, LLC Joint Application for Authority to  
Complete an Assignment of Assets Between Authorized Domestic and International 214  
Carriers

Dear Secretary Dortch:

Pursuant to pursuant to Section 214 of the Communications Act, as amended,<sup>1</sup> and Sections 63.04 and 63.24 of the "Commission's rules,"<sup>2</sup> BCN Telecom, Inc. ("BCN") and Network Billing Systems LLC dba Fusion dba Solex ("NBS") hereby submit the attached *Joint Application* for authority to assign certain BCN domestic interstate and international telecommunications customers and assets of BCN to NBS. This Application was initially submitted to the Commission on May 26, 2017 in WC Docket No. 17-203 and ITC-ASG-20170822-00142. Applicants withdrew the Application on September 6, 2017, in order to allow time to further consider the transaction. Having resolved their concerns, Applicants now re-file in order to complete the regulatory review process and move forward with their plans. The requisite filing fees have been paid electronically contemporaneously with these submissions.

Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

MILLER ISAR, INC.

/s/ Andrew O. Isar

Andrew O. Isar

Regulatory Consultants to  
Network Billing Systems LLC dba Fusion dba Solex and  
for BCN Telecom, Inc.

Attachment

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<sup>1</sup> 47 U.S.C. §214.

<sup>2</sup> 47 C.F.R. §§63.04 and 63.24.