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October 8, 2018

VIA ECFS

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

Attn: Wireline Competition Bureau

RE: Joint Application of Protocall, LLC and Combined Public Communications, LLC.
for Consent to Transfer Assets and Customers

Dear Secretary Dortch:

Attached please find for filing a Joint Application for Consent to Transfer Assets and Customers of a Company Holding Blanket Domestic Section 214 Authority and to Partially Assign International Section 214 Authority Pursuant to the Communications Act of 1934, as Amended for Protocall, LLC and Combined Public Communications, LLC.

This filing with the Wireline Competition Bureau and the applicable credit card payment in the amount of \$1,195.00, which satisfies the filing fee required under the Commission's rules, are being submitted electronically through the ECFS. All correspondence and inquiries in connection with this filing should be forwarded to the undersigned.

Respectfully submitted,

/s/ Lance J.M. Steinhart

Lance J.M. Steinhart
Managing Attorney
Lance J.M. Steinhart, P.C.
Attorney for Protocall, LLC and Combined Public Communications, LLC

In the Matter of
 Protocall, LLC
 Assignor,
 and
 Combined Public Communications, LLC
 Assignee,
 For Consent To Transfer Assets and Customers
 Subject to Blanket Domestic Authority and
 To Partially Assign International Section 214
 Authority Pursuant to the Communications Act
 of 1934, as Amended

WC Docket No. _____

JOINT APPLICATION

Pursuant to Section 214 of the Communications Act of 1934, as amended (the “Act”), 47 U.S.C. § 214, and Sections 63.01, 63.03, 63.04, 63.18 and 63.24 of the Commission’s rules, 47 C.F.R. §§ 63.01, 63.03, 63.04 and 63.24, Protocall, LLC (“Protocall”) and Combined Public Communications, LLC (“Combined Public”) (collectively, the “Applicants”) hereby request Commission consent for the: (i) transfer certain assets and customers of Protocall to Combined Public, and (ii) assignment of the international Section 214 authorizations held by Protocall.

Effective October 1, 2017¹, the assets and customers of Protocall were sold to Combined Public (the “Transaction”) pursuant to an asset purchase agreement dated September 27, 2017 by and between Protocall and Combined Public (the “Agreement”).

I. REQUEST FOR STREAMLINED TREATMENT

The Applicants respectfully request streamlined treatment of both the domestic and international components of this Joint Application pursuant to Sections 63.03 and 63.12 of the Commission’s rules, 47 C.F.R. §§ 63.03 and 63.12, respectively. This Application is eligible for streamlined processing pursuant to Section 63.03(b)(2) of the Commission’s rules because (i) the Transaction resulted in Combined Public, the transferee, having a market share in the interstate, interexchange market of less than 10 percent; (ii) Combined Public will provide competitive telephone exchange services or exchange access services (if at all) exclusively in geographic areas served by a dominant local exchange carrier that is not a party to the Transaction; and (iii) neither of the Applicants nor any of their affiliates are regulated as dominant with respect to any service. This Application also qualifies for streamlined treatment under Section 63.12 of the Commission’s

¹ The Applicants are concurrently filing a request for Special Temporary Authority with the International and Wireline Competition Bureaus for authority to continue providing services to the assigned customers utilizing the assigned assets pending approval of this Joint Application.

rules because: (1) neither Protocall nor Combined Public is affiliated with any foreign or dominant U.S. carrier; (2) as a result of the Transaction, neither party is affiliated with any foreign carrier as defined in the Commission's rules; and (3) none of the other scenarios outlined in Section 63.12(c) of the Commission's rules apply.

Unfortunately, the Applicants did not seek timely Commission approval of the Transaction. The oversight was inadvertent and unintentional. At the time of the Transaction, Protocall did not have advice from federal communications counsel on the Transaction and was not aware of the obligation to request Commission approval for the Transaction. As soon as this failure came to the Applicants' attention, the Applicants took steps to remedy the noncompliance to the extent possible by seeking Special Temporary Authority ("STA"), attached hereto as Exhibit A, for the continued provision of service to customers. The Applicants regret this oversight and have taken steps to ensure compliance with all applicable Commission requirements going forward.

The Applicants request expeditious approval of the assignments, which would serve the public interest by allowing customers to continue to receive competitive services from Combined Public without interruption. As a competitive provider of inmate telephone services, Combined Public is well qualified to provide the domestic and international services to the acquired customers.

II. DESCRIPTION OF THE APPLICANTS

A. Protocall, LLC (FRN: 0016273153)

Protocall is a Kansas limited liability company with headquarters in 14927 S. Caenen Lane, Olathe, Kansas 66062. Protocall has authority to provide interstate and international

telecommunication services². Protocall provides or is authorized to provide inmate telephone services to correctional facilities in Iowa, Kansas, Colorado, Nebraska, and Missouri.

B. Combined Public Communications, LLC (FRN: 0004327656)

Combined Public is a Delaware limited liability company with headquarters located at 100 Aqua Drive, Cold Spring, Kentucky 41076. Combined Public has authority to provide interstate and international telecommunication services³. Combined Public specializes in the provision of inmate communications services and has appropriate state certifications in Alabama, Colorado, Florida, Georgia, Indiana, Iowa, Kansas, Kentucky, Louisiana, Mississippi, Missouri, Nebraska, North Carolina, Ohio, South Carolina, Tennessee, and Wyoming.

III. DESCRIPTION OF THE TRANSACTION

The Transaction was a customer and asset acquisition under which Combined Public acquired the existing customers and substantially all of the assets of Protocall currently utilized to provide inmate telecommunications services specifically in the states of Iowa, Kansas, Colorado, Nebraska and Missouri. Customers continue to be serviced by Combined Public on substantially the same terms and conditions as previously provided by Protocall. The consummation of the Transaction did not result in an interruption, reduction, loss or impairment of services to any customer.

The Transaction did not result in a reduction or impairment of service to Protocall's customers. As more fully described below in the public interest statement, Combined Public continues to provide a high level of technical operations and customer service to

² File No. ITC-214-20100113-00018 granting authority to provide facilities-based and resale services granted February 12, 2010.

³ File No. ITC -214-20101119-00450 granting authority to provide resale services granted December 10, 2010.

Protocall's customers.

The Transaction raises no competitive issues. Combined Public continues to compete with other local providers of inmate telecommunication services. No radio licenses were included in the Transaction. No foreign carrier affiliations resulted from this Transaction, and consumers will not be harmed.

Protocall will cancel its domestic registration and surrender its international Section 214 authority once it is determined it no longer needs its authorizations for operational or billing purposes.

IV. PUBLIC INTEREST STATEMENT

Approval of the Transaction will serve the public interest, convenience, and necessity as it will permit the continued, uninterrupted provision of high-quality service to customers. Approval will also promote competition in the inmate telecommunications marketplace. The effect of the Transaction and transfer of customers from Protocall to Combined Public has not resulted in an interruption, reduction, loss or impairment of services to any customer. Further, the Applicants are not aware of any harm to customers or to the market that has occurred as a result of the Transaction. The continued provision of service by Combined Public will provide customers the positive benefit of access to existing and new product offerings. The Transaction is transparent to customers and will not have a negative impact on the public interest, services to customers, or competition.

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

In support of this Joint Application, the Applicants submit the following information pursuant to Section 63.24(e) of the Commission's rules, which include the information requested in Section 63.18:

- (a) Name, address, and telephone number of each applicant.

Assignor:

Protocall, LLC
Attn: David Lindgren
14927 S. Caenen Lane, Olathe, KS 66062
Telephone: (573) 481-2265
FRN: 0016273153

Assignee:

Combined Public Communications, LLC
Attn: Josh Welk, CFO
100 Aqua Drive, Cold Spring, KY 41076
Telephone: (859) 652-9972
FRN:0004327656

- (b) State under the laws of which each applicant is organized.

Protocall is a limited liability company organized under the laws of Kansas.

Combined Public is a limited liability company organized under the laws of Delaware.

- (c) Name, title, address, and telephone number of an officer for each applicant and legal counsel.

Protocall, LLC

David R. Lindgren
President and Managing Member
Protocall, LLC
14927 S. Caenen Lane
Olathe, Kansas 66062

Phone: (913) 530-9048
E-mail: dlindgren@combinedpublic.com

Combined Public Communications, LLC

Josh Welk
CFO
100 Aqua Drive
Cold Spring, KY 41076
Phone: (859) 652-9972
E-mail: jwelk@combinedpublic.com

Legal Counsel to All Applicants (to whom correspondence should be addressed):

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Alpharetta, Georgia 30005
Attention: Lance J.M. Steinhart, Esq.
Managing Attorney
Telephone: (770) 232-9200
Email: lsteinhart@telecomcounsel.com

(d) Statement about previous international Section 214 authorizations for each applicant.

Protocall, LLC holds blanket interstate Section 214 authority and global Section 214 authority to provide international services. See File No. ITC-214-20100113-00018 granting authority to provide facilities-based and resale services granted February 12, 2010.

Combined Public Communications, LLC holds blanket interstate Section 214 authority and global Section 214 authority to provide international services. See File No. ITC-214-20101119-00450.

(e-g) Not applicable

(h) Ten Percent or Greater Interest Holder in Combined Public.

Client Telephone Solutions, LLC owns 100% of Combined Public. CPC Engle Holdings, Inc., a Delaware corporation whose principal business is telecommunications holdings owns 89.84% of Client Telephone Solutions, LLC. No other person or entity holds a ten percent or greater direct or indirect interest in Client Telephone Solutions, LLC.

(i) Combined Public certifies that (a) it is not a foreign carrier and is not affiliated with a foreign carrier, and (b) it will not become a foreign carrier or become affiliated with a foreign carrier post-close.

(j) Combined Public certifies that it does not seek to provide international telecommunications services to any destination country where (i) it is a foreign carrier; (ii) it controls a foreign carrier; (iii) any entity that owns more than 25 percent of it, or that controls Combined Public, controls a foreign carrier; or (iv) two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of Combined Public and are parties to, or the beneficiaries of, a contractual relation affecting the provision or marketing of international basic telecommunications services in the United States.

(k) Not applicable

(l) [Reserved]

(m) Not applicable

(n) Combined Public certifies that it has 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 market power on the foreign end of the route, and they will not enter into such agreements in the future.

(o) Combined Public certifies that, pursuant to sections 1.2001 through 1.2003 of the Commission's rules, they are not subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

(p) Applicants request streamlined processing of the international portion of this Application pursuant to section 63.12 of the Commission's rules, 47 C.F.R. § 63.12. This Application qualifies for streamlined treatment under section 63.12(c) of the Commission's rules because (i) Applicants are not affiliated with a foreign carrier and will not become affiliated with any foreign carrier as a result of the proposed transaction; (ii) Applicants are not affiliated with any dominant U.S. carrier whose international switched or private line services Applicants seek authority to resell, nor will Applicants be so affiliated post-close; and (iii) none of the other scenarios outlined in section 63.12(c) of the Commission's rules, 47 C.F.R. § 63.12, apply.

VI. INFORMATION REGARDING DOMESTIC ASSIGNMENT OF ASSETS AND CUSTOMERS

Pursuant to Section 63.04 of the Commission's Rules, 47 C.F.R. § 63.04(b), the Applicants request authority to transfer assets and customers to Combined Public. Applicants provide the following information in support of their request:

§ 63.04(a)(6) Description of the Transaction.

The Applicants describe the Transaction in Section II of this Joint Application.

§ 63.04(a)(7) Geographic Areas Served and Services Provided.

The Applicants describe the geographic areas in which they offer domestic telecommunications services and the services that are provided in each area in Sections I and II of this Joint Application.

§ 63.04(a)(8) Statement Regarding Streamlined Treatment.

The Applicants Section 214 assignment application is eligible for streamlined processing pursuant to Section 63.03(b)(2), 47 C.F.R. § 63.03(b)(2), of the Commission's rules because: (i) the Transaction resulted in Combined Public, the assignee, having a market share in the interstate interexchange market of less than 10 percent; (ii) Combined Public will provide competitive telephone exchange services exclusively in geographic areas served by a dominant local exchange carrier that is not a party to the Transaction; and (iii) neither of the Applicants nor any of their affiliates are regulated as dominant with respect to any service.

§ 63.04(a)(9) Other Related Commission Applications.

In connection with this Joint Application, the Applicants will submit a Request for Special Temporary Authorization regarding the continued provision of service to customers.

§ 63.04(a)(10) Statement Regarding Special Consideration.

None.

§ 63.04(a)(11) Identification of Waiver Requests.

None.

§ 63.04(a)(12) Public Interest Statement.

The Applicants provide a statement showing how the approval of this application will serve

the public interest, convenience, and necessity in Section III of this Joint Application.

VII. CONCLUSION

Based on the foregoing, the Applicants respectfully request that the Commission grant this Joint Application and consent to the assignment of Protocall assets and customers to Combined Public for use in the provision of inmate telecommunications services, and the assignment of the international Section 214 authorizations held by Protocall to allow the transition of customers from Protocall to Combined Public.

Respectfully submitted,

/s/ Lance J.M. Steinhart

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lsteinhart@telecomcounsel.com (E-Mail)

Dated: October 8, 2018

EXHIBIT A

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

Joint Application for Assignment of Assets and Customers

EXHIBIT B

CERTIFICATIONS

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October 8, 2018

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

Attn: Wireline Competition Bureau

Re: Protocall, LLC and Combined Public Communications, LLC,
Request for Special Temporary Authorization

Dear Secretary Dortch,

Pursuant to 47 U.S.C. § 214, and Section 63.24 of the Commission's Rules, 47 C.F.R. § 63.24, Protocall, LLC ("Protocall") along with Combined Public Communications, LLC ("Combined Public") (collectively, the "Applicants"), hereby respectfully request Special Temporary Authority ("STA") so that Combined Public may continue to service newly acquired business pending Commission approval of their joint section 214 applications, filed concurrently herewith, for assignment of domestic and international authorizations and transfer of customers and assets from Protocall to Combined Public (the "Joint Application").

Effective October 1, 2017, Protocall sold all the rights, title and interest in all the customers and assets (the "Transaction") utilized to provide inmate telecommunications services to certain jails and detention centers in Iowa, Kansas, Colorado, Nebraska and Missouri pursuant to an asset purchase agreement dated September 27, 2017 by and between Protocall and Combined Public (the "Agreement"). The Transaction resulted in the sale of Protocall's domestic operations and customers, *see* 47 C.F.R. §§ 63.01, 63.03, and 63.04, and the partial assignment of Protocall's international Section 214 authorization pursuant to 47 C.F.R. §§ 63.18 and 63.24.

Unfortunately, the Applicants did not seek timely Commission approval of the Transaction. The oversight was inadvertent and unintentional. At the time of the Transaction, Protocall did not have advice from federal communications counsel on the Transaction and it was not aware of the obligation to request Commission approval. As soon as this failure came to the Applicants' attention, the Applicants took steps to remedy the noncompliance and to seek authority, to the extent necessary, for the continued provision of service to customers. The Applicants regret this oversight and have taken steps to ensure compliance with all applicable Commission requirements going forward.

Grant of the STA will serve the public interest by permitting the continued, uninterrupted provision of service to customers while the Commission reviews the Joint Application. Grant of the STA also will promote competition in the inmate telephone services marketplace. Without discounting the regulatory obligation to obtain prior approval, the Applicants note that no harm to customers or to the market occurred as a result of Applicants' oversight.

The Applicants request temporary authority for sixty (60) days while the Joint Application is pending. The Applicants acknowledge that the grant of this STA will not prejudice any action the Commission may take on the Joint Application, and that once granted, the STA may be revoked on the Commission's own notice, without a hearing. The Applicants further acknowledge that grant of the STA will neither preclude nor dictate the scope of any enforcement action related to the Transaction.

This filing with the Wireline Competition Bureau and the applicable credit card payment in the amount of \$1,195.00, which satisfies the filing fee required under the Commission's rules, are being submitted electronically through the ECFS. All correspondence and inquiries in connection with this filing should be forwarded to the undersigned.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Respectfully submitted,

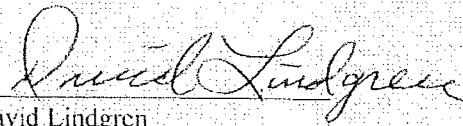
/s/ Lance J.M. Steinhart

Lance J.M. Steinhart
Managing Attorney
Lance J.M. Steinhart, PC
Attorneys for Combined Public Communications,
LLC and Protocall, LLC

CERTIFICATION

I, David Lindgren, hereby state under penalty the perjury that I am the President and Managing Member of Protocall, LLC., that I have reviewed the foregoing Application and know the contents thereof, and that the statements made therein are true and correct to the best of my knowledge and belief.

Dated: October 5, 2018

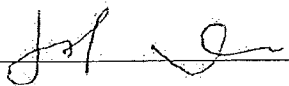
A handwritten signature in cursive script, reading "David Lindgren".

David Lindgren
President and Managing Member
Protocall, LLC

CERTIFICATION

I, Josh Welk, hereby state under penalty the perjury that I am the Chief Financial Officer of Combined Public Communications, LLC., that I have reviewed the foregoing Application and know the contents thereof, and that the statements made therein are true and correct to the best of my knowledge and belief.

Dated: 10/5/2018



Josh Welk
Chief Financial Officer
Combined Public Communications, LLC