

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

In the Matter of the Joint Application of)
Reserve Communications and Computer)
Corporation)
and)
EATELCORP, L.L.C.) WC Docket No. 19-____
for Authority Pursuant to Section 214 of the) IB File Nos. ITC-T/C-2019-____
Communications Act of 1934, as amended,)
to Transfer Control of Domestic and)
International Section 214 Authorization Holder)
EATELCORP, L.L.C. to Reserve)
Communications and Computer Corporation)

JOINT APPLICATION

Pursuant to Section 214 of the Communications Act of 1934, as amended (“the Act”),¹ and Sections 63.03, 63.04, 63.18 and 63.24 of the Commission’s rules,² Reserve Communications and Computer Corporation (“Reserve”) and EATELCORP, L.L.C. (“EATEL”) (collectively, the “Applicants”) request Commission consent to the transfer of control of EATEL from its current member-owners to Reserve, by merger, as described more fully below.

This transaction, which will be accomplished at the holding company level, will have no impact on the day-to-day operations of any entity providing service pursuant to FCC authorization. Following the consummation of the planned merger transaction, all of EATEL’s domestic and international Section 214 authorizations (listed below) will continue to be held by

¹ 47 U.S.C. §214.

² 47 C.F.R. §§63.03, 63.04, 63.18 and 63.24.

EATEL, and there will be no interruption or change to any services offered by EATEL pursuant to FCC authorization.

The Applicants are parent companies of incumbent independent local exchange carriers (“ILECs”) (as defined in Section 64.1902 of the Commission’s rules)³ that have, in combination, fewer than two percent of the nation's subscriber lines installed in the aggregate, nationwide, and have no overlapping or adjacent ILEC service areas. Therefore, this application presumptively qualifies for streamlined treatment pursuant to Section 63.03(b)(2)(iii) of the Commission’s rules.⁴ Further, this application qualifies for streamlined processing under Section 63.12(a) and (b) of the Commission’s rules, as it implicates none of the factors listed in Section 63.12(c) of the Commission’s rules.⁵ Streamlined processing therefore is requested.

In support of this Application, Applicants provide the following information:

I. DESCRIPTION OF THE APPLICANTS

A. Transferee – Reserve Communications and Computer Corporation

Reserve is a privately-held Louisiana limited liability company with principal offices at 105 RTC Drive, Reserve, Louisiana. Reserve is a wholly-owned subsidiary of RTC Interco, L.L.C., which in turn is wholly-owned by RTC Holdings, L.L.C. (“RTC Holdings”). All individuals and entities holding ten percent or more of the equity or voting equity of RTC Holdings are disclosed in Section **IV.h.**, below. A diagram depicting the corporate structure of Reserve is provided in **Exhibit A**.

Reserve, together with its various operating subsidiaries (the “Reserve Companies”), which include both rural ILECs and competitive local exchange carriers (“CLECs”), provide a

³ 47 C.F.R. §64.1902.

⁴ 47 C.F.R. §63.03(b)(2)(iii)

⁵ 47 C.F.R. §§63.12(a)-(c).

variety of telecommunications services, including local exchange telecommunications services and high-speed broadband Internet access services, to approximately 5,358 residential and business local exchange customers in portions of the Louisiana parishes of Lafourche, St. James, and St. John the Baptist.

Reserve Companies provide U.S. domestic interexchange voice service to about 5,244 subscribers. As set forth more fully in **Section V**, below, the combined interexchange (“IX”) market share of the Applicants will be well below ten percent of the total interstate IX market.⁶

B. Transferor – EATELCORP, L.L.C.

EATEL is a privately-held Louisiana limited liability company with principal offices at 913 S. Burnside Avenue, Gonzales, Louisiana. All individuals and entities holding ten percent or more of the equity or voting equity of EATEL are disclosed in **Section IV.h.**, below.

A diagram depicting the corporate structure of EATEL is provided in **Exhibit B**. EATEL, together with its various operating subsidiaries (the “EATEL Companies”) which include both rural ILECs and competitive local exchange carriers (“CLECs”), provide a variety of telecommunications services, including local exchange telecommunications services, interexchange service, and high-speed broadband Internet access services, to approximately 14,338 residential and business local exchange customers (13,530 ILEC customers and 808 CLEC customers) in several communities in southeast Louisiana, including portions of the parishes of Ascension, Jefferson, Lafourche, and Livingston. EATEL operates a state-of-the-art, fiber-based communications network and the only Uptime Institute Certified Tier III data center in Louisiana.

⁶ Although not relevant to this application, Reserve Long Distance Company, Inc. also serves as cable television franchisee in the Louisiana parishes of Lafourche St, James, and St. John the Baptist. One Reserve affiliate, Columbia Cellular, Inc., is a commercial mobile radio service licensee for market CMA461 (RSA Louisiana 8,) channel block B, St. James parish.

EATEL Companies provide U.S. domestic interexchange voice service to about 17,507 subscribers both within and outside the EATEL local exchange territories. As set forth more fully in **Section V**, below, the combined IX market share of the Applicants will be well below ten percent of the total interstate IX market.⁷ A list of affected Section 214 authorizations is provided in **Section IV.d.**, below.

II. DESCRIPTION OF THE TRANSACTION (RESPONSE TO QUESTION 13)

On December 18, 2018, EATEL, Reserve, and RTC MergeCo L.L.C., a wholly-owned subsidiary of Reserve (“MergeCo”),⁸ entered into an Agreement and Plan of Merger (the “Merger Agreement”). Pursuant to the Merger Agreement, Reserve will acquire all of the outstanding equity interests in EATEL from its current owner-members in exchange for cash. This will be accomplished through a merger of MergeCo with and into EATEL, whereupon the separate existence of MergeCo will cease and EATEL will be the surviving corporation, and EATEL will be wholly-owned by Reserve. The combined companies will be headquartered in Gonzales, Louisiana.

The parties intend to close as soon as all necessary regulatory approvals are granted, as soon as mid-March but no later than May 1, 2019. After the Transaction closes, the current management of EATEL will serve in leadership roles of the combined company, and Reserve will continue to be privately held. The Transaction will not effect any change in ownership of Reserve. (All individuals and entities holding ten percent or more of the equity or voting equity of the combined company upon closing are disclosed in **Section IV.h.**, below.)

⁷ Although not relevant to this application, EATEL Companies also serve as cable television franchisees in a number of communities in southeast Louisiana, including Baton Rouge, Thibodaux and portions of Ascension, Iberville, Lafourche and Livingston parishes.

⁸ MergeCo is a Louisiana limited liability company formed for the purposes of this transaction.

Diagrams depicting the pre-merger and post-merger corporate structures of EATEL and Reserve are provided in **Exhibits A and B**.

III. PUBLIC INTEREST CONSIDERATIONS

The proposed transaction will serve the public interest, convenience and necessity. The Applicants, through their respective operating subsidiaries, serve neighboring rural markets in southeastern Louisiana but have no overlapping or adjacent ILEC service areas (and *de minimis* adjacent and overlapping CLEC service areas), with a combined share of the interstate IX market well below ten percent, all as explained in further detail below. Several other, far larger carriers provide local exchange and exchange access, IX, broadband, and other services in the same region, including BellSouth/AT&T, CenturyLink, Charter, Cox, and Uniti, each with more substantial service footprints than either of the Applicants. Thus, the proposed transaction will not be detrimental to competition in any respect.

The merger will enhance the ability of each company to efficiently serve customers and invest in advanced communications infrastructure by uniting two very small telecommunications service providers that are uniquely focused on serving the citizens of rural southeastern Louisiana.

Reserve is managerially, technically, and financially qualified to complete the proposed transaction. Reserve has provided telecommunications services in rural Louisiana since 1935. Reserve's management has significant experience operating ILECs in rural Louisiana, and Reserve has successfully deployed innovative broadband and video services to such markets, while running a financially sound company with the ability to invest and maintain the network. Moreover, Reserve's management intends to work closely with senior members of the EATEL management team, who will remain with the company following the merger, and the parties have no intention to reduce staff in either company. The Applicants therefore will have the

managerial, technical and financial qualifications to continue providing high-quality telecommunications and information services to residential and business customers in southeast Louisiana and the surrounding area following the merger.

The Applicants expect that, following the merger, they will be in a stronger financial and operational position, with the greater scale and scope of a combined company, that will improve their ability to invest in infrastructure, deploy advanced services, and compete in the rapidly evolving communications market.

Following the consummation of the transaction, no changes to the rates, terms or conditions of existing services are planned. The transaction will be transparent to EATEL customers, not resulting in the discontinuance or impairment of service to any customer.

For the foregoing reasons, the transaction poses no harm to the public interest but will bring about benefits to residential and business customers in Louisiana.

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

Pursuant to Section 63.24(e)(2) of the Commission's Rules, the Applicants submit the following information requested in Section 63.18 (a)-(d) and (h)-(p) in support of this Application:

(a) Name, address and telephone number of each Applicant:

Transferee:

William Ironside, President
Reserve Communications and Computer Corporation
105 RTC Dr
Reserve, LA 70084

Transferor:

John Scanlan, Chief Executive Officer
EATELCORP, L.L.C.
913 S. Burnside Avenue
Gonzales, LA 70737-4258

(b) Jurisdiction of Organizations:

Transferee: Reserve is a limited liability company formed under the laws of Louisiana.

Transferor: EATEL is a limited liability company formed under the laws of Louisiana.

(c) (Answer to Question 10) Correspondence concerning this Application should be sent to:

For Transferee:

William Ironside, President
Reserve Communications and Computer Corporation
105 RTC Dr
Reserve, LA 70084

For Transferor:

John Scanlan, Chief Executive Officer
EATELCORP, L.L.C.
913 S. Burnside Avenue
Gonzales, LA 70737-4258

In each case with a copy to:

Karen Brinkmann
KAREN BRINKMANN PLLC
1800 M Street, NW
Suite 800-North
Washington, DC 20036

(d) Section 214 Authorizations

EATEL functions as a holding company and does not hold authority to provide telecommunications services in its own right. The following wholly-owned subsidiaries of EATEL (the “Domestic Carriers”) are authorized to provide domestic interstate

telecommunications services (exchange access and interexchange services) by virtue of blanket domestic Section 214 authority pursuant to Section 63.01 of the Commission’s rules:⁹

<i>Telecommunications Carrier</i>	<i>Service</i>
Advanced Tel, LLC	Domestic Exchange Access & Interexchange (“IX”) Services
East Ascension Telephone Company, L.L.C.	Domestic Exchange Access Service
Lafourche Telephone Company, L.L.C.	Domestic Exchange Access Service
TLX Communications, Inc.	Domestic Exchange Access & IX Services

The following wholly-owned subsidiaries of EATEL (the “International Carriers”) hold international section 214 authorizations:

<i>Telecommunications Carrier</i>	<i>Service</i>	<i>ITC No.</i>
Advanced Tel, LLC	International Resale	ITC-214-19940131-00027
SJI, L.L.C.	International Resale	ITC-214-20020402-00156 ITC-T/C-20110930-00308
TLX Communications, Inc.	International Resale	ITC-95-475 ITC-T/C-20001010-00578

(h) (*Answer to Questions 11 & 12*) The Domestic Carriers and International Carriers all are, directly or indirectly, wholly-owned by EATEL. **Exhibit B** sets forth the complete corporate structure of EATEL. The following entities (i) directly or indirectly, wholly own one or more of the Domestic or International Carriers, (ii) are directly or indirectly, wholly-owned by EATEL, and (iii) have the same principal place of business as EATEL:

EATEL Acquisition, L.L.C.

⁹ 47 C.F.R. § 63.01.

To EATEL's knowledge, the only individuals or entities currently holding a 10% or greater ownership interest in EATEL are:¹⁰

Name: **Arthur G. Scanlan II**
Address: 22239 Waterfront East Drive
Maurepas, LA 70449
Citizenship: U.S.A.
Principal Business: Chairman of the Board
% Interest: 10.10%

Name: **John D. Scanlan**
Address: 10440 Shadowlake Drive
Geismar, LA 70734
Citizenship: U.S.A.
Principal Business: Chief Executive Officer
% Interest: 10.10%

Name: **Beryl S. Smith**
Address: P.O. Box 1709
Prairieville, LA 70769
Citizenship: U.S.A.
Principal Business: Board Member
% Interest: 10.10%

Name: **The 2012 BSS Trust**
Address: 913 S. Burnside Avenue
Gonzales, LA 70737
Citizenship: U.S.A.
Principal Business: Trust
% Interest: 17.13%

¹⁰ Unless otherwise indicated, the ownership interests provided herein represent both equity and voting interests.

Name: **The 2003 AGSIII Trust**
Address: 913 S. Burnside Avenue
Gonzales, LA 70737
Citizenship: U.S.A.
Principal Business: Trust
% Interest: 10.35%

Name: **The 2003 DPS Trust**
Address: 913 S. Burnside Avenue
Gonzales, LA 70737
Citizenship: U.S.A.
Principal Business: Trust
% Interest: 17.68%

Name: **The 2003 JPS Trust**
Address: 913 S. Burnside Avenue
Gonzales, LA 70737
Citizenship: U.S.A.
Principal Business: Trust
% Interest: 10.35%

Upon consummation of the proposed transaction, the following will have a 10 percent or greater ownership interest in EATEL (*see also Exhibit B*):

Name: **Reserve Communications and Computer Corporation**
Address: 105 RTC Dr
Reserve, LA 70084
Citizenship: Louisiana, U.S.A.
Principal Business: Holding Company
% Interest: 100%

As stated above, Reserve is wholly-owned by RTC Interco, L.L.C., which in turn is wholly-owned by RTC Holdings. To Reserve's knowledge, the only individuals or entities currently holding a 10% or greater ownership interest in RTC Holdings are:¹¹

¹¹ Unless otherwise indicated, the ownership interests provided herein represent both equity and voting interests.

Name: **Jennifer and Sean Reilly Family, LLC**
Address: 2987 Reymond Avenue
Baton Rouge, La 70808
Citizenship: Louisiana, U.S.A.
Principal Business: Investment entity
% Interest: 44.44%

Name: **Ninemile, L.L.C.**
Address: 5321 Corporate Blvd.
Baton Rouge, La 70808
Citizenship: Louisiana, U.S.A.
Principal Business: Investment entity
% Interest: 28.588%

Name: **Reilly Family Limited Partnership**
Address: 5321 Corporate Blvd.
Baton Rouge, La 70808
Citizenship: Louisiana, U.S.A.
Principal Business: Investment partnership
% Interest: 11.112%

(i) **(Answer to Question 14)** Transferee certifies that (a) it is not a foreign carrier within the meaning of 63.09(d) of the Commission’s Rules and (b) it is not affiliated, within the meaning of 63.09 of the Commission’s Rules, and will not become affiliated as a result of the proposed transaction, with any foreign carriers.¹²

(j) **(Answer to Question 15)** Transferee does not seek to provide international telecommunications services to any destination country where: (1) Transferee is a foreign carrier in that country; (2) Transferee controls a foreign carrier in that country; (3) any entity that owns more than 25 percent of Transferee, or that controls Transferee, controls a foreign carrier in that country; or (4) two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of Transferee and are parties to, or the beneficiaries of, a

¹² 47 C.F.R. §63.09(d).

contractual relation affecting the provision or marketing of international basic telecommunications services in the United States.

(k) Not applicable: Transferee is not a foreign carrier and is not affiliated with a foreign carrier, and Transferee will not become affiliated with a foreign carrier as a result of the proposed transaction.

(m) Not applicable: Transferee is not a foreign carrier and is not affiliated with a foreign carrier, and Transferee will not become affiliated with a foreign carrier as a result of the proposed transaction.

(n) Each of Transferee and the International Carriers certifies that it has not agreed to accept any 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 will not enter into any such agreements in the future.

(o) Each of Transferee and Transferor certifies that it is not subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1998.¹³

(p) The Applicants request streamlined processing pursuant to Section 63.12(a)-(b) of the Commission's rules.¹⁴ This transaction qualifies for streamlined processing because Section 63.12(c)(1) of the Commission's rules is inapplicable, as no Applicant is a foreign carrier or affiliated with any foreign carrier, and none of the scenarios outlined in Section 63.12(c) applies.¹⁵

¹³ Certifications attached. *See* 21 U.S.C. § 853a; *see also* 47 C.F.R. §§ 1.2001-1.2003.

¹⁴ 47 C.F.R. § 63.12(a)-(b).

¹⁵ *See* 47 C.F.R. § 63.12(c).

V. INFORMATION REQUIRED BY SECTION 63.04 OF THE COMMISSION’S RULES

This application is presumptively entitled to streamlined processing pursuant to Section 63.03(b)(2)(iii).¹⁶ First, the proposed transaction would result in the transferee having a total market share of less than ten percent in the interstate, interexchange (“IX”) market. Second, the combined company would provide competitive telephone exchange services or exchange access (“CLEC”) services exclusively in geographic areas served by a dominant local exchange carrier that is not a party to the transaction. Third, the applicants are incumbent local exchange carriers (“ILECs”) (as defined in Section 64.1902 of the Commission’s rules) that have, in combination, fewer than two percent of the nation's subscriber lines installed in the aggregate nationwide, and no overlapping or adjacent ILEC service areas.

Concerning the first criterion, the applicants’ combined IX customer base is approximately 22,751 customers, substantially less than ten percent of the nationwide IX market.¹⁷ The region is served by numerous other IX carriers, including wireline and wireless facilities-based competitors much larger than either of the Applicants.

Concerning the second criterion, the applicants provide CLEC services in areas neighboring their own ILEC operations, exclusively in the ILEC service territory of BellSouth/AT&T, which is a dominant local exchange carrier that is not a party to the transaction.¹⁸ Moreover, the region served by the Applicants as CLECs also is served by other

¹⁶ See 47 C.F.R. §63.03(b)(2)(iii).

¹⁷ See *id.* According to the most recent available figures from the Commission’s telephone subscribership report released in November 2018, the nationwide interexchange service market includes approximately 22 million “consumer grade” long-distance customers and 32 million “business and government grade” long-distance customers. Voice Telephone Services Report, Federal Communications Commission (Wireline Comp. Bur. rel. Nov. 2018), available at: <https://www.fcc.gov/voice-telephone-services-report>.

¹⁸ See *id.*

fixed wireline competitors, such as CenturyLink, Comcast, Cox, and Uniti, as well as numerous wireless competitors. Thus, there are no competitive concerns that might cause the Commission to remove this transaction from streamlined processing.¹⁹

Regarding the third criterion for presumptive streamlined processing: The Applicants are parent companies of ILECs (as defined in Section 64.1902 of the Commission's rules)²⁰ that have, in combination, fewer than two percent of the nation's subscriber lines installed in the aggregate, nationwide, and have no overlapping or adjacent ILEC service areas.²¹

Applicants note that, at two locations, the ILEC service areas of the Applicants are near to one another but do not abut or overlap: on either side of a lake, and on opposite banks of a river. Because no customer locations or territories that could be served by the ILECs actually abut or overlap one another, due to the natural barriers established by these two bodies of water, the Applicants meet the test for streamlined processing.

In one location, the boundary between ILEC service areas in one location is Lake Maurepas, where EATEL's ILEC boundary follows the west bank of the lake, theoretically extending into the center of the lake, and Reserve's ILEC boundary follows the parish boundary to the east of the lake, theoretically extending into lake as well. No services are (or could be) provided by either ILEC in the center of the lake – there are no customers nor any land for customers to be located in the lake. Because no service locations actually served by either ILEC abuts any service territory actually served (or capable of being served) by the other, the ILEC

¹⁹ Though not necessary to qualify for streamlined processing, the applicants also note that their respective CLEC service areas overlap with each other only to a *de minimis* extent, merely 9.1 square miles (1.8 square miles near the Sunshine Bridge in St. James Parish, Louisiana, and 7.3 square miles in Thibodaux, Louisiana) in which EATEL serves barely two dozen customers. See **Exhibit C**.

²⁰ 47 C.F.R. §64.1902.

²¹ See 47 C.F.R. §63.03(b)(2)(iii).

service areas are not adjacent (nor overlapping). The two are separated for all practical purposes.²²

Similarly, the two applicants have neighboring ILEC service territories along a 1.4-mile stretch of the Blind River, where it flows into Lake Maurepas. Each of Reserve and EATEL provides ILEC service on its respective bank of the Blind River, but no service is provided (nor could it be provided) *in* the river as there are no customers in the river. Therefore, the territories served by EATEL and Reserve ILECs are not adjacent – no territory actually served by either ILEC abuts territory actually served or capable of being served by the other. An illustration of the service areas of both Applicants, showing these natural barriers between the ILECs' respective service areas, is provided in **Exhibit C**.

For the foregoing reasons, this application should presumptively qualify for streamlined treatment pursuant to Section 63.03(b)(2)(iii) of the Commission's rules.

Applicants submit the following additional information in support of the application:

(a) (6) A description of the proposed transaction is set forth in **Section II**, above.

(a)(7) EATEL provides interstate and intrastate domestic telecommunications services in portions of Ascension, Jefferson, Lafourche, and Livingston parishes in southeast Louisiana. Reserve provides interstate and intrastate domestic telecommunications services in portions of Lafourche, St. James, and St. John the Baptist parishes in Louisiana.

To EATEL's knowledge, no individuals or entities that hold a 10 percent or greater ownership interest in EATEL either themselves hold any FCC authorizations to provide domestic

²² Neither carrier would have an economic incentive to extend lines across the lake into the other's service area. The lake forms a natural barrier to extension of service by either carrier.

telecommunications services, or directly or indirectly own or control 10 percent or more of any entity that holds any FCC authorizations to provide domestic telecommunications services.

(a)(8) This application presumptively qualifies for streamlined treatment pursuant to Section 63.03(b)(2)(iii) of the Commission’s rules.²³ The Applicants are parent companies of ILECs (as defined in Section 64.1902 of the Commission’s rules)²⁴ that have, in combination, fewer than two percent of the nation's subscriber lines installed in the aggregate nationwide, and have no overlapping or adjacent ILEC service areas, as described above. The combined interstate, interexchange market share of the Applicants will be approximately 22,751 customers, well below ten percent of the total interstate IX market as a result of this Transaction.²⁵

(a)(9) In addition to the Section 214 authorizations described herein, EATEL holds the following authorizations and licenses from the Commission:

<i>Licensee</i>	<i>Authorization type</i>
East Ascension Telephone Company, L.L.C.	Business radio license
EATEL Video, LLC	Satellite earth station registration (RO)
EATEL Westside LLC	Satellite earth station registration (RO)
Vision Communications, LLC	Satellite earth station registration (RO)

(a)(10) No party is requesting special consideration on the grounds that it faces imminent business failure. However, the Applicants plan to complete the proposed merger as soon as regulatory approvals are granted, with a target date on or before May 1, 2019. Therefore, Applicants respectfully request expedited processing of this application.

(a)(11) Not applicable as the Applicants are not filing any waiver requests in connection with the proposed transaction.

²³ 47 C.F.R. §63.03(b)(2)(iii).

²⁴ 47 C.F.R. §64.1902.

²⁵ *See supra*, note 17.

(a)(12) A statement showing how grant of the application will serve the public interest, convenience and necessity, is provided in Section III above.

VI. CONCLUSION

For the foregoing reasons, the public interest, convenience and necessity will be served by streamlined processing and expeditious grant of this application.

Respectfully submitted,



Karen Brinkmann
Managing Member
KAREN BRINKMANN PLLC
1800 M Street, NW
Washington, DC 20036

Counsel for the Applicants

January 28, 2019

Exhibit A

Pre-Merger Organization of Transferor

[all 100% ownership]

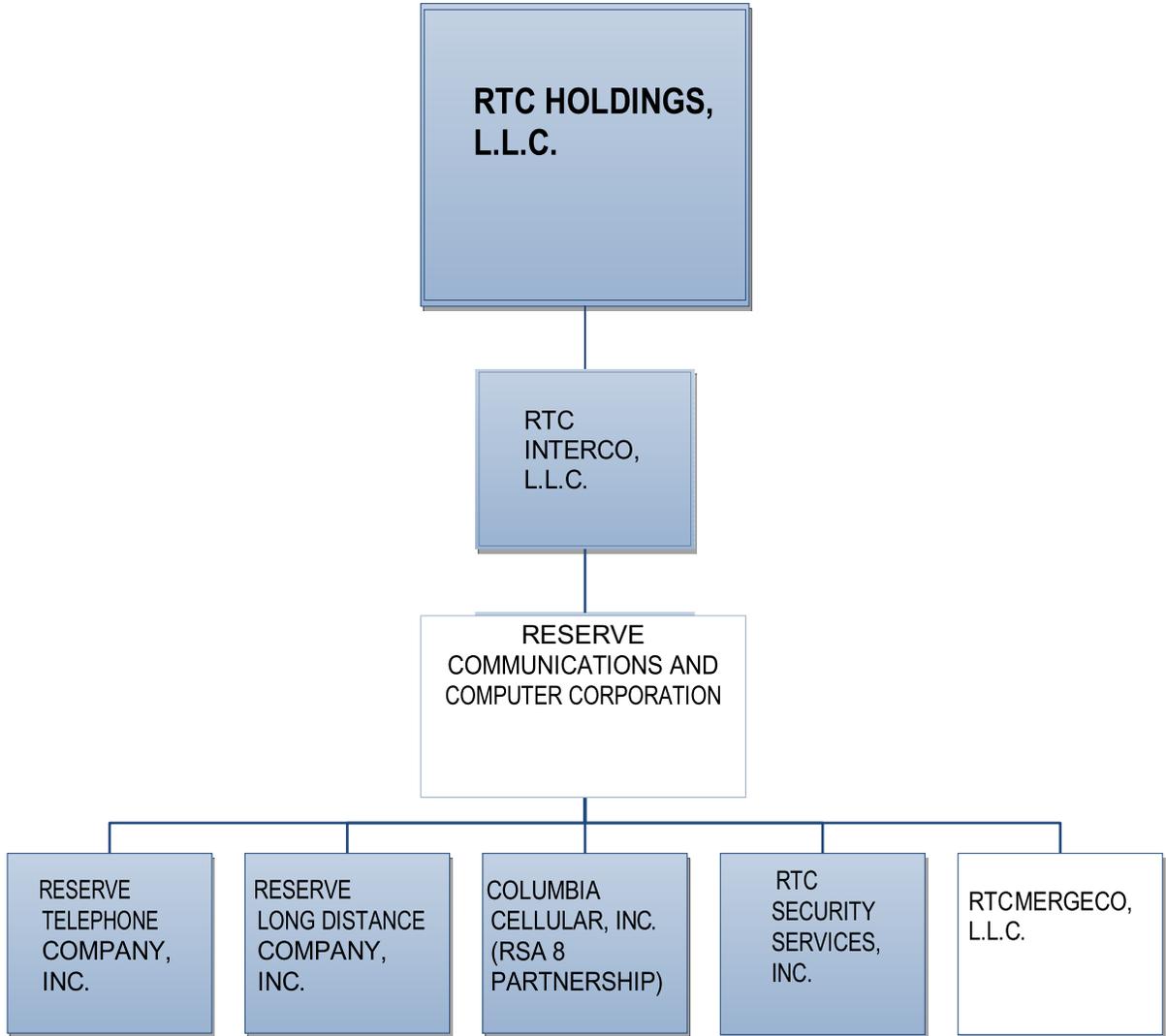
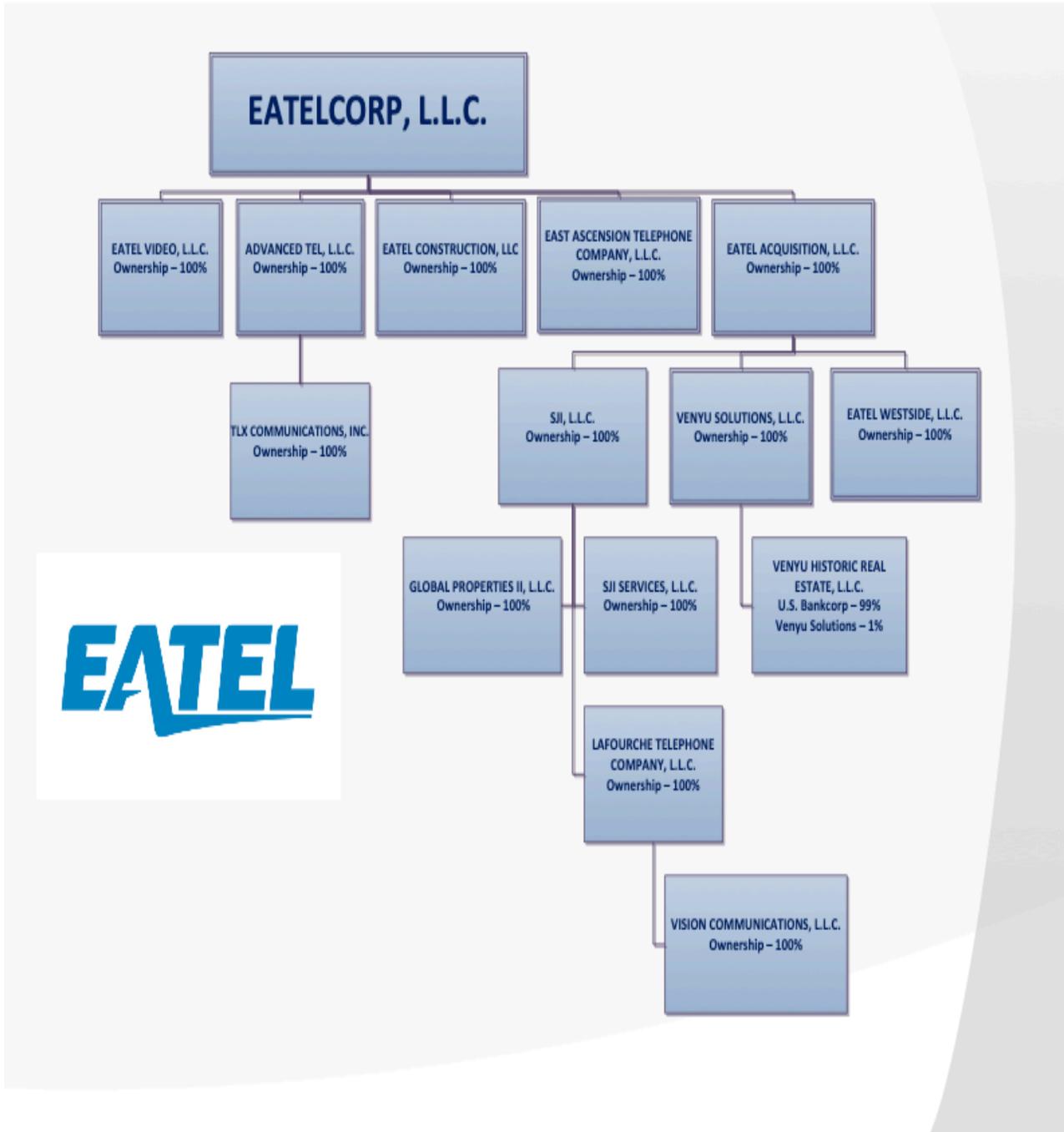


Exhibit B

Pre-Merger Organization of Transferee



Post-Merger Organization

[all 100% ownership]

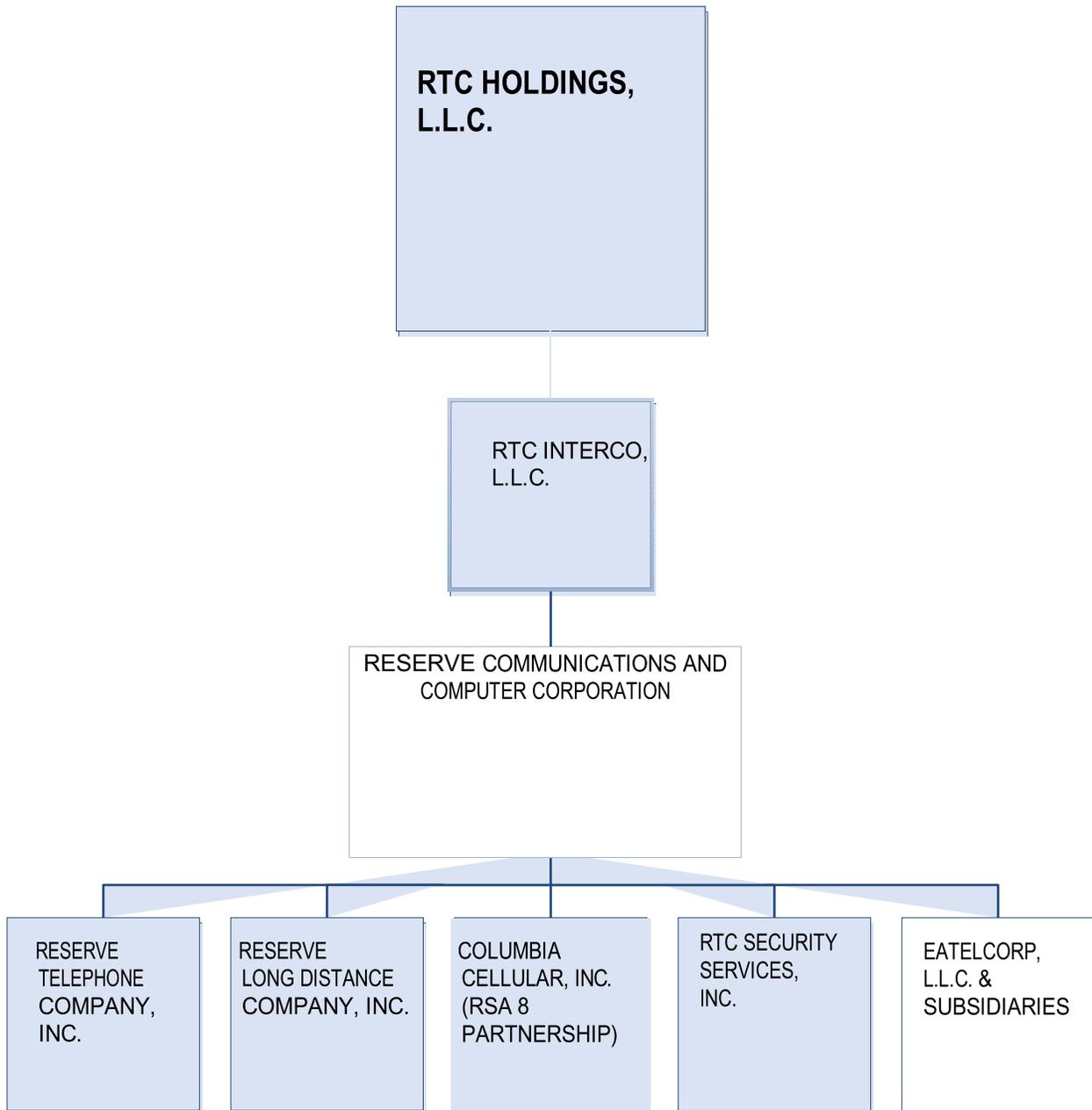


Exhibit C

Service Area Illustration

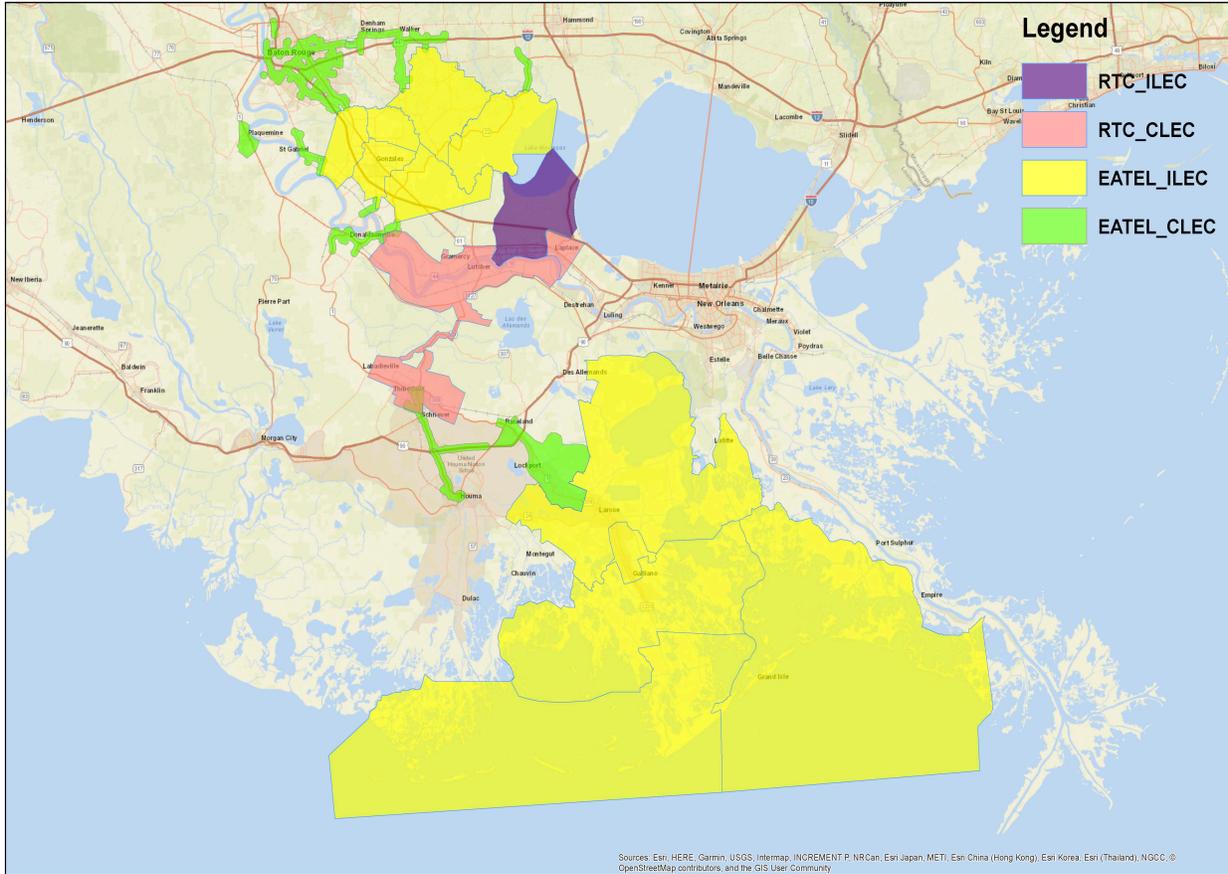
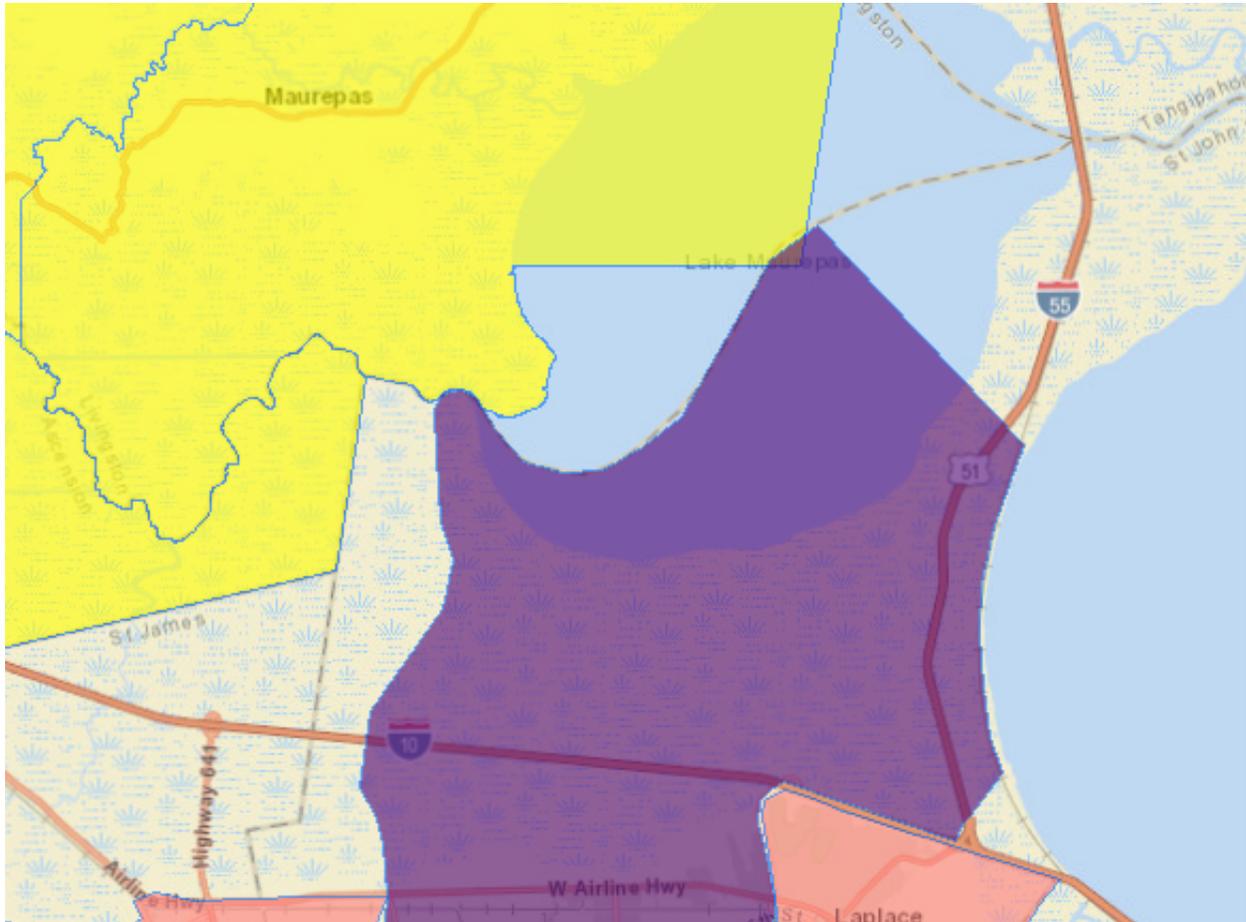


Exhibit C, continued

Service Area Detail – ILEC Study Areas Separated By Lake Maurepas & Blind River



*Reserve Communications and Computer Corporation
EATELCORP, L.L.C.
Section 214 Application*

**Certifications Required By
21 U.S.C. § 853a & 47 C.F.R. §§ 1.2001-1.2003**

(Attached)

EATEL Verification

I, John D. Scanlan, hereby declare that I am Chief Executive Officer of EATELCORP, L.L.C. (the "Transferor"); that I am authorized to make this Verification on behalf of the Transferor; that the foregoing application was prepared under my direction and supervision; and that the contents with respect to the Transferor are true and complete to the best of my knowledge, information and belief.

This I declare under penalty of perjury this 28th day of January 2019.

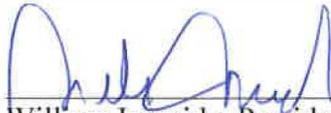
A handwritten signature in black ink that reads "John D. Scanlan". The signature is written in a cursive style with a horizontal line underneath the name.

John D. Scanlan, Chief Executive Officer
EATELCORP., L.L.C.

Reserve Verification

I, William Ironside, hereby declare that I am President of Reserve Communications and Computer Corporation (the "Transferee"); that I am authorized to make this Verification on behalf of the Transferee; that the foregoing application was prepared under my direction and supervision; and that the contents with respect to the Transferee are true and complete to the best of my knowledge, information and belief.

This I declare under penalty of perjury this 28th day of January, 2019.



William Ironside, President
Reserve Communications and Computer Corporation