



1300 NORTH 17th STREET, 11th FLOOR  
ARLINGTON, VIRGINIA 22209

OFFICE: (703) 812-0400  
FAX: (703) 812-0486  
www.fhhlaw.com  
www.commlawblog.com

October 15, 2018

CHENG-YI LIU  
(703) 812-0478  
LIU@FHHLAW.COM

**VIA ECFS**

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Domestic Section 214 Applications for the Transfer of Control of Interexchange Resellers to Martin Tibbitts (WC Docket Nos. 18-107, 18-108, 18-109, 18-110, 18-111, and 18-112): Amendment to Change Transferee from Martin Tibbitts to the Estate of Martin Tibbitts**

Dear Ms. Dortch:

Through this letter, the applicants (collectively, the “Applicants”) in the following Domestic Section 214 Applications (collectively, the “Applications”) for the transfer of control of several interexchange resellers to Martin Tibbitts hereby amend their Applications to change the designated Transferee from Martin Tibbitts to the Estate of Martin J. Tibbitts:

<b><u>WC Docket No.</u></b>	<b>Transferor</b>
18-107	Business Network Long Distance, Inc.
18-108	Network Service Billing, Inc.
18-109	Nationwide Long Distance Service, Inc.
18-110	Integrated Services, Inc.
18-111	Communications Network Billing, Inc.
18-112	Multiline Long Distance, Inc.

Regrettably, Mr. Tibbitts passed away suddenly in an unfortunate aviation accident on July 20, 2018. Accordingly, the Applicants hereby amend each of the Applications to designate the Estate of Martin J. Tibbitts as the Transferee.

October 15, 2018

Page 2

---

On July 26, 2018, the Probate Court of the County of Wayne, Michigan, appointed Belinda G. Tibbitts as Special Personal Representative of the Estate of Martin J. Tibbitts. Ms. Tibbitts is a United States citizen. Contact information for Mrs. Tibbitts, as Special Personal Representative of the Estate of Martin J. Tibbitts, and the Estate of Martin J. Tibbitts is as follows:

714 Grand Marais Street  
Grosse Pointe, MI 48230  
(248) 353-7620  
btibbitts@bossco.com

Attached to this letter is a signed verification of Mrs. Tibbitts, as Special Personal Representative of the Estate of Martin J. Tibbitts, attesting that the information provided in this letter regarding the Estate of Martin J. Tibbitts is true and accurate.

Following the consummation of the transactions contemplated in the Applications, as amended herein (collectively, the “Transactions”), the Estate of Martin J. Tibbitts will have attributable interests in the interexchange resellers acquired through the Transactions.

The Estate of Martin J. Tibbitts will have an attributable interest in LCR Telecommunications, LLC (“LCR”) and National Access Long Distance, Inc. (“NALD”) following the consummation of the involuntary transfer of control of both entities from Mr. Tibbitts to the Estate of Martin J. Tibbitts. Prior to his death, Mr. Tibbitts was the sole owner of LCR. Mr. Tibbitts had acquired a 100% interest in NALD concurrent with the other interexchange resellers that are the subjects of the Applications, but a domestic transfer of control application was not filed for NALD due to administrative oversight.

Should you have any questions regarding this letter, please contact the undersigned.

Respectfully submitted,

*/s/ Cheng-yi Liu*

*/s/ Mark C. DeSantis*

*Counsel to the Estate of Martin J. Tibbitts*

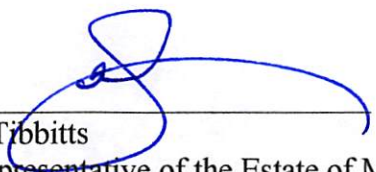
Enclosure

cc: Alex Johns ([alexis.johns@fcc.gov](mailto:alexis.johns@fcc.gov))  
Tracey Wilson ([tracey.wilson@fcc.gov](mailto:tracey.wilson@fcc.gov))

**VERIFICATION**

I, Belinda G. Tibbitts, am Personal Representative of the Estate of Martin J. Tibbitts (the "Estate"), and am accordingly authorized to make this verification on behalf of the Estate. The statements in the foregoing submission relating to the Estate are true and correct to best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
Belinda G. Tibbitts  
Personal Representative of the Estate of Martin Tibbitts

Dated: October 12, 2018