

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

In the Matter of)
)
LCR Telecommunications, LLC) WC Docket No. 18-_____
Licensee)
)
Application for Consent to Involuntary)
Transfer of Control of Domestic Section 214)
Authority)
)

To: Wireline Competition Bureau

**STREAMLINED APPLICATION FOR CONSENT TO INVOLUNTARY TRANSFER
CONTROL OF DOMESTIC SECTION 214 AUTHORITY**

LCR Telecommunications, LLC (“Licensee”), pursuant to Section 214 of the Communications Act of 1934,¹ as amended, and Sections 63.03 and 63.04 of the Commission’s Rules,² hereby request consent to the transfer of control of Licensee, holder of international and domestic 214 authority.³ Martin Tibbitts owned and controlled Licensee until his death on July 20, 2018. This application is filed to obtain the Commission’s consent to the involuntary transfer of Licensee to the Estate of Martin J. Tibbitts (the “Estate” or “Transferee”). As explained herein, this application qualifies for streamlined processing pursuant to Section 63.03(b) of the Commission’s Rules.⁴

In accordance with the requirements of Section 63.04(a) of the Commission’s Rules, the Estate submits the following information:

¹ 47 U.S.C. § 214.

² 47 C.F.R. §§ 63.03 and 63.04.

³ A separate application has been filed with the International Bureau for transfer of control of international 214 authority.

⁴ *Id.* § 63.03(b).

1. Name, Address, and Telephone Number of Each Applicant

Licensee:

LCR Telecommunications, LLC
100 W. Big Beaver
Suite 200
Troy, MI 48098
(877) 554-7958

Transferor:

Martin Tibbitts
C/O The Estate of Martin J. Tibbitts
Belinda G. Tibbitts, Personal Representative
714 Grand Marais Street
Grosse Pointe, MI 48230
(248) 353-7620

Transferee:

The Estate of Martin J. Tibbitts
C/O Belinda G. Tibbitts, Personal Representative
714 Grand Marais Street
Grosse Pointe, MI 48230
(248) 353-7620

2. Government, State, or Territory Under the Laws of Which Each Corporate or Partnership Applicant is Organized

Licensee is a limited liability company organized under the laws of Michigan.

3. Name, Title, Post Office Address, and Telephone Number of the Officer or Contact Person to whom Correspondence Concerning the Application is to be Addressed

Cheng-yi Liu
Mark C. DeSantis
Fletcher, Heald & Hildreth, PLC
1300 N. 17th Street, Suite 1100
Arlington, VA 22209
(703) 812-0400

4. Name, Address, Citizenship and Principal Business of Any Person or Entity that Directly Owns at Least Ten (10) Percent of the Equity of the Applicant, and the Percentage of Equity Owned by Each of those Entities

Following the death of Martin Tibbitts, the following owns 100% of Licensee:

The Estate of Martin J. Tibbitts
C/O Belinda G. Tibbitts, Personal Representative
714 Grand Marais Street
Grosse Pointe, MI 48230
Citizenship: US
Principal Business: Investor and Telecommunications

5. Certification Pursuant to 47 C.F.R. §§ 1.2001 Through 1.2003 that No Party to the Application is Subject to Denial of Federal Benefits Pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988

Applicants certify, pursuant to 47 C.F.R. §§ 1.2001 through 1.2003, that no party to the present application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988. Applicants certify that this certification is true, complete, and correct to the best of their knowledge and belief and is made in good faith.

6. Description of the Transaction

On July 20, 2018, Martin Tibbitts unexpectedly passed away. His 100% interest in Licensee was transferred to the Estate. On July 26, 2018, the Probate Court of the County of Wayne, Michigan appointed Belinda G. Tibbitts as Special Personal Representative of the Estate. On September 18, 2018, the Probate Court of the County of Wayne, Michigan appointed Belinda G. Tibbitts as Personal Representative of the Estate of Martin J. Tibbitts, which superseded her appointment by the court as Special Personal Representative of the Estate on July 26, 2018. Ms. Tibbitts is a United States citizen.

7. Description of the Geographic Areas in which Assignor and Assignee (and their Affiliates) Offer Domestic Telecommunications Services, and what Services are Provided in Each Area

Transferee currently holds a 100% interest in Licensee. The Licensee is an interexchange reseller providing resold interexchange services to customers on an intrastate, interstate, and international basis. Licensee holds international Section 214 Authority as granted on May 13, 1998

in ITC-214-19980313-00189. In addition, Transferee now owns a 100% interest in the following companies which also provide resold interexchange services on an intrastate, interstate, and international basis (“Affiliated Entities”):

1. Business Network Long Distance, Inc., a Nevada corporation.
2. Communications Network Billing, Inc., a Nevada corporation.
3. Integrated Services, Inc., a Nevada corporation.
4. Multiline Long Distance, Inc., an Ohio corporation.
5. Nationwide Long Distance Services, Inc., a Nevada corporation.
6. Network Service Billing, Inc., a Nevada corporation.
7. National Access Long Distance, Inc., a Nevada corporation.

A chart identifying the states in which Licensee and the Affiliated Entities provide service is attached hereto as Appendix A.

8. Statement as to how the Application Fits into One or More of the Presumptive Streamlined Categories in Section 63.03 or why it is Otherwise Appropriate for Streamlined Treatment

This application fits within the presumptive streamlined categories as outlined in 47 CFR § 63.03, and streamlined treatment is requested. Licensee is a non-facilities-based reseller of long distance services and Transferee, the Estate, is not a telecommunications provider.⁵ Additionally, neither Transferee nor Licensee are affiliated with a foreign carrier, and neither seeks authority to resell the international or private line services of any affiliated dominant U.S. carrier.⁶

9. Identification of All Other Commission Applications Related to the Same Transaction

On September 25, 2018, the Estate filed an undocketed request for domestic special temporary authority to operate Licensee pending Commission action on the necessary transfer of

⁵ 47 C.F.R. § 63.03(b)(1).

⁶ Neither Licensee nor Transferee are affiliated with a dominant U.S. carrier.

control applications. The Estate filed for international special temporary authority on September 27, 2018.⁷ Finally, the Estate filed an application for transfer of control of the international 214 authorizations for Licensee and the Affiliated Entities on September 27, 2018.⁸

10. Statement of Whether the Applicants are Requesting Special Consideration Because Either Party to the Transaction is Facing Imminent Business Failure

No party to the transaction is facing imminent business failure.

11. Identification of any Separately Filed Waiver Requests Being Sought in Conjunction with the Transaction

No separately filed waiver requests are being sought in conjunction with the transaction.

12. Statement Showing how Grant of the Application will Serve the Public Interest, Convenience and Necessity, Including any Additional Information that may be Necessary to Show the Effect of the Proposed Transaction on Competition in Domestic Markets

Approval of the involuntary transfer of control will serve the public interest by allowing Licensee to continue to provide high-quality service to existing customers without any interruption. Furthermore, the involuntary transfer had no adverse impact on current customers and was completely transparent to customers in terms of the service they receive. Customer rates, terms, and conditions were not changed as a result of this involuntary transfer. Licensee's business practices, customer service offerings, and customer billing remain the same.

⁷ File No. ITC-STA-INTR2018-06230.

⁸ File No. ITC-T/C-20180927-00180.

Finally, the involuntary transfer raises no competitive issues because Transferee is not a telecommunications provider and there is ample competition in the domestic telecommunications space.

Respectfully submitted,

_____/s/_____

Cheng-yi Liu
Mark C. DeSantis
Fletcher, Heald & Hildreth, P.L.C.
1300 N. 17th Street, Suite 1100
Arlington, VA 22209
Tel: (703) 812-0400
Fax: (703) 812-0486
liu@fhhlaw.com
*Counsel for the Estate of Martin J.
Tibbitts*

October 15, 2016

Appendix A

States with Active Accounts								
State	BNLD	CNBI	ISI	MLDI	NALD	NLDS	NSBI	LCR
AL								
AK								
AZ								
AR								
CA								
CO								
CT								
DE								
DC								
FL								
GA								
HI								
ID								
IL								
IN								
IA								
KS								
KY								
LA								
ME								
MD								
MA								
MI								
MN								
MS								
MO								
MT								
NE								
NV								
NH								
NJ								
NM								
NY								
NC								
ND								
OH								
OK								
OR								
PA								
RI								
SC								
SD								
TN								
TX								
UT								
VT								

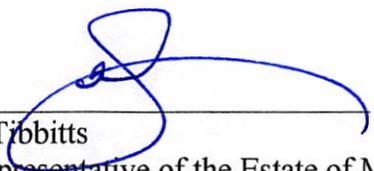
VA								
WA								
WV								
WI								
WY								

Key	
	State in which entity provides service
BNLD	Business Network Long Distance, Inc.
CNBI	Communications Network Billing, Inc.
ISI	Integrated Services, Inc.
MLDI	Multiline Long Distance, Inc.
NALD	National Access Long Distance, Inc.
NLDS	Nationwide Long Distance Services, Inc.
NSBI	Network Service Billing, Inc.
LCR	LCR Telecommunications, LLC

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