



April 27, 2017  
Via ECFS and Overnight Filing

Federal Communications Commission  
Wireline Competition Bureau  
P.O. Box 979091  
St Louis, MO 63197-9000

RE: Joint Application for Authorization to Transfer Control of Legacy Long Distance International, Inc. to Jail Education Solutions, Inc. dba Edovo

Dear Sir or Madam

Enclosed for filing please find the original and five (5) copies of the Joint Application for Authorization to Transfer Control of Legacy Inmate Communications, Inc. to Jail Education Solutions, Inc. This application has also been submitted to the International Bureau, reference number ITC-T/C-20170405-00060. Included with this application is the Remittance Advice Form 159 with credit card payment information in the amount of \$1,155.00 for Lock Box 979091.

This cover letter and associated attachments are also being filed electronically today via the Federal Communications Commission's Electronic Comments Filing System (ECFS).

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for that purpose.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3005 or via email to [swarren@tminc.com](mailto:swarren@tminc.com). Thank you for your assistance in this matter.

Sincerely,

Sharon R. Warren  
Consultant to Legacy Long Distance International, Inc.

cc: Curtis Brown (Via Email) – Legacy  
Valerie Hedge (Via Email) - Edovo  
tms: FCx1703

SW/mp

<b>INTERNATIONAL SECTION 214 AUTHORIZATIONS FOR ASSIGNMENT OR TRANSFER OF CONTROL FCC FORM 214TC FOR OFFICIAL USE ONLY</b>	
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**APPLICANT INFORMATION**

Enter a description of this application to identify it on the main menu:

Copy of Application to Transfer Control of Legacy Long Distance International, Inc. dba Legacy Inmate Communications to Jail Education Solutions, Inc. dba Edovo

<b>1. Legal Name of Applicant</b>			
Name:	Jail Education Solutions, Inc. dba Edovo	Phone Number:	602-403-9905
DBA Name:		Fax Number:	
Street:	500 W. Madison Avenue Suite 801	E-Mail:	
City:	Chicago	State:	IL
Country:	USA	Zipcode:	60661 -
Attention:	Mr Brian Hill		

<b>2. Name of Contact Representative</b>			
Name:	Sharon R. Warren	Phone Number:	4077403005
Company:	Technologies Management, Inc.	Fax Number:	4077400613
Street:	151 Southhall Lane Suite 450	E-Mail:	swarren@tminc.com
City:	Maitland	State:	FL
Country:	USA	Zipcode:	32751-
Attention:		Relationship:	Other

**CLASSIFICATION OF FILING**

<b>3. Choose the button next to the classification that best describes this filing. Choose only one.</b>	
<input type="radio"/>	a. Assignment of Section 214 Authority An Assignment of an authorization is a transaction in which the authorization, or a portion of it, is assigned from one entity to another. Following an assignment, the authorization will usually be held by an entity other than the one to which it was originally granted. (See Section 63.24(b).)
<input checked="" type="radio"/>	b. Transfer of Control of Section 214 Authority A Transfer of Control is a transaction in which the authorization remains held by the same entity, but there is a change in the entity or entities that control the authorization holder. (See Section 63.24(c).)
<input type="radio"/>	c. Notification of Pro Forma Assignment of Section 214 Authority (No fee required)
<input type="radio"/>	d. Notification of Pro Forma Transfer of Control of Section 214 Authority (No fee required)
Date of Consummation: Must be completed if you select c or d.	

<b>4. File Number(s) of Section 214 Authority(ies) for Which You Seek Consent to Assign or Transfer Control.</b>							
Note: If the Section 214 Authorization Holder whose authority is being assigned or transferred does not have an "ITC" File No. under which it is operating, contact the Help Desk for assistance before proceeding further with this application. You cannot enter an "ITC-ASG" or "ITC-T/C" File No. in response to this question. Your response must specify one or more "ITC" File Nos. Relevant "ITC-ASG" or "ITC-T/C" File Nos. should be listed only in Attachment 1 in response to Question 10.							
File	File	File	File	File	File	File	File

Number:ITC2141996112500596|| Number: || Number: || Number: || Number: || Number: || Number: || Number:

5. Name of Section 214 Authorization Holder

Name:	Mr Curtis A Brown	Phone Number:	714-826-0547
DBA Name:		Fax Number:	
Street:	10833 Valley View Street Suite 150	E-Mail:	info@golegacy.com
City:	Cypress	State:	CA
Country:	USA	Zipcode:	90830 -
Attention:			

6. Name of Assignor / Transferor

Name:	Mr Curtis A Brown	Phone Number:	714-826-0547
DBA Name:	Legacy Long Distance International, Inc.	Fax Number:	
Street:	10833 Valley View Street Suite 150	E-Mail:	info@golegacy.com
City:	Cypress	State:	CA
Country:	USA	Zipcode:	90830 -
Attention:			

7. Name of Assignee / Transferee

Name:	Jail Education Solutions, Inc. dba Edovo	Phone Number:	602-403-9905
DBA Name:		Fax Number:	
Street:	500 W. Madison Avenue Suite 801	E-Mail:	
City:	Chicago	State:	IL
Country:	USA	Zipcode:	60661 -
Attention:	Mr Brian Hill		

8a. Is a fee submitted with this application?

If Yes, complete and attach FCC Form 159.

If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).

Governmental Entity  Noncommercial educational licensee  Notification of Pro Forma (No fee required.)

Other (please explain):

8b. You must file a separate application for each legal entity that holds one or more Section 214 authorizations to be assigned or transferred.

Fee Classification CUT - Section 214 Authority

9. Description (Summarize the nature of the application.)

Joint International and Domestic Section 214 Application to Transfer Control of Legacy Long Distance International, Inc. dba Legacy Inmate Communications to Jail Education Solutions, Inc. dba Edovo

10. In Attachment 1, please respond to paragraphs (c) and (d) of Section 63.18 with respect to the assignor/transferor and the assignee/transferee. Label your response "Answer to Question 10".

11. Does any entity, directly or indirectly, own at least ten (10) percent of the equity of the assignee/transferee as determined by successive multiplication in the manner specified in the note to Section 63.18(h) of the rules?  Yes  No

If you answered "Yes" to this question, provide in Attachment 1, the name, address, citizenship, and

principal businesses of each person or entity that directly or indirectly owns at least ten (10) percent of the equity of the assignee/transferee, and the percentage of equity owned by each of those persons or entities (to the nearest one percent). Label your response "Answer to Question 11."

12. Does the assignee/transferee have any interlocking directorates with a foreign carrier?  Yes  No

If you answered "Yes" to this question, identify each interlocking officer/director in Attachment 1. (See Section 63.09(g).) Provide the name and position/title of the individual or entity, the name of the foreign carrier, and the country in which the foreign carrier is authorized to operate. Label your response: "Answer to Question 12."

13. Provide in Attachment 1 a narrative of the means by which the proposed assignment or transfer of control will take place. In circumstances of a substantial assignment or transfer of control pursuant to Section 63.24(e), where the assignor seeks authority to assign only a portion of its U.S. international assets and/or customer base, please specify whether the assignor requests authority to continue to operate under any or all of its international Section 214 File Nos. after consummation; and, if so, please specify in Attachment 1 each File No. it seeks to retain in its own name. Label your response "Answer to Question 13."

Note: The assignor may retain any or all of its international Section 214 File Nos. In that case, the assignor will continue to hold the international section 214 authorizations that it specifies in response to this question. The ITC-ASG File No. that the Commission assigns to this application will, when granted, constitute Commission authorization of the proposed assignment of assets and /or customers from the assignor to the assignee. Unless Commission grant of the assignment application specifies otherwise, the assignee may provide the same services on the same routes as permitted under the assignor's Section 214 authorization(s), and the assignee may provide such service to any customers it may obtain in the ordinary course of business.

If this filing is not a notification of a *pro forma* assignment or *pro forma* transfer of control, please respond to Questions 14-20 below. (See Section 63.24(d).) Otherwise, you may proceed to Question 21 below.

14. Check "Yes" below if the assignee is a foreign carrier or if, upon consummation of the proposed assignment or transfer of control, the Section 214 holder would be affiliated with a foreign carrier. (See Section 63.18 (i).) The terms "foreign carrier" and "affiliated" are defined in Section 63.09 (d) & (e) of the rules respectively.  Yes  No

If you answered "Yes" to this question, please specify in Attachment 1 each foreign country in which the assignee is a foreign carrier or in which the Section 214 holder, upon consummation, would be affiliated with a foreign carrier. Label your response, "Answer to Question 14."

15. If this application is granted and the proposed assignment or transfer is consummated, would the Section 214 holder be authorized to provide service to any destination country for which any of the following statements is true?  Yes  No

- (1) The Section 214 holder is a foreign carrier in that country; or
- (2) The Section 214 holder controls a foreign carrier in that country; or
- (3) Any entity that owns more than 25 percent of the Section 214 holder, or that controls the Section 214 holder, controls a foreign carrier in that country.
- (4) Two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of the Section 214 holder and are parties to, or the beneficiaries of, a contractual relation (e.g., a joint venture or market alliance) affecting the provision or marketing of international basic telecommunications services in the United States.

If you answered "Yes" to this question, please specify in Attachment 1 each foreign carrier and country for which any of the above statements would be true. Label your response, "Answer to Question 15."

16. If you answered "Yes" to question 14, do you request classification of the Section 214 holder as a "non-dominant" carrier, upon consummation of the proposed transaction, between the United States and  Yes  No any or all countries listed in response to Question 14? See Section 63.10 of the rules.

If you answered "Yes" to this question, you must provide information in Attachment 1 to demonstrate that the Section 214 holder would qualify for non-dominant classification under Section 63.10 of the rules on each U.S.-destination country route where it would be a foreign carrier, or would be affiliated with a foreign carrier and for which you request non-dominant classification. Label your response, "Answer to Question 16."

17. If you answered "Yes" to question 14 and you have not provided information in response to Question 16 to demonstrate that the Section 214 holder would qualify for non-dominant classification under Section 63.10 of the rules on each U.S.-destination route where it would be a foreign carrier, or be affiliated with a foreign carrier, check "Yes" below to certify that the assignee/transferee agrees to comply with the dominant carrier safeguards in Section 63.10 (c) & (e) of the rules in the provision of

international service between the United States and any foreign country(ies) for which you have not provided the required information.

- Yes, I certify that I agree to comply with the dominant carrier safeguards in Section 63.10 (c) & (e) of the rules in my provision of international service between the United States and the following foreign country(ies):
- No, Does not apply.

18. If you answered "Yes" to question 15, and if you have not provided information in response to question 16 to demonstrate that the Section 214 holder would qualify for non-dominant classification under Section 63.10 of the rules in its provision of service to each of the countries identified in response to question 15, the Section 214 holder may not be eligible to provide international telecommunications service between the U.S. and each such country following consummation of the assignment or transfer. In order to determine whether the public interest would be served by authorizing service on these U.S.-destination country routes, the assignee/transferee must provide information, in Attachment 1, to satisfy one of the showings specified in Section 63.18(k) of the rules. Label your response, "Answer to Question 18."

19. *If the assignee, or the Section 214 holder that is the subject of this transfer of control application, is a provider of Commercial Mobile Radio Services, you need not answer this question.*

If any of the Section 214 authorization(s) that would be assigned or transferred, authorize the Section 214 holder to resell the international switched services of an unaffiliated U.S. carrier for the purpose of providing international telecommunications services to a country listed in response to question 14, and unless you have provided information in response to question 16 to demonstrate that the Section 214 holder would qualify for non-dominant classification under Section 63.10(a)(3) of the rules for each country, check "Yes" below to certify that the assignee/transferee will file the quarterly traffic reports required by Section 43.61(c) of the rules; and/or state in Attachment 1 that the foreign carrier(s) for which the applicant has not made a showing under Section 63.10(c)(3) do(es) not collect settlement payments from U.S. international carriers. (See Section 63.18(l).)

- Yes, I certify that I agree to comply with the quarterly traffic reporting requirements set forth in section 43.61 (c) of the rules.

20. If the applicant desires streamlined processing pursuant to Section 63.12 of the rules, provide in Attachment 1 a statement of how the application qualifies for streamlined processing. (See Section 63.18(p).) Note that, if the application is being filed in connection with a sale of assets or reorganization of a carrier or its parent pursuant to the U.S. bankruptcy laws, the application may not be eligible for streamlined processing until final bankruptcy court approval of the proposed sale or reorganization.

**Applicant certifies that its responses to questions 21 through 25 are true:**

21. The assignee/transferee certifies that it has not agreed to accept special concessions directly or indirectly from a foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into any such agreements in the future.  Yes  No

22. By signing this application, the undersigned certify either (1) that the authorization(s) will not be assigned or that control of the authorization(s) will not be transferred until the consent of the Federal Communications Commission has been given, or (2) that prior Commission consent is not required because the transaction is subject to the notification procedures for *pro forma* transactions under Section 63.24 of the rules. The assignee/transferee also acknowledges that the Commission must be notified by letter within 30 days of a consummation or of a decision not to consummate. (See Section 63.24(e)(4).)  Yes  No

23. If this filing is a notification of a *pro forma* assignment or transfer of control, the undersigned certify that the assignment or transfer of control was *pro forma* and that, together with all previous *pro forma* transactions, does not result in a change in the actual controlling party.  Yes  No  Not a Pro Forma

24. The undersigned certify that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.  Yes  No

25. The assignee/transferee certifies that neither it nor any other party to the application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance. See Section 1.2002(b) of the rules, 47 CFR § 1.2002(b), for the definition of "party to the application" as used in this certification.  Yes  No

**CERTIFICATION**

26. Printed Name of Assignor / Transferor

29. Printed Name of Assignee / Transferee

Legacy Long Distance International, Inc. dba Legac	Jail Education Solutions, Inc. dba Edovo
27. Title (Office Held by Person Signing) President & CEO	30. Title (Office Held by Person Signing) President & CEO
28. Signature (Enter the name of the person who will sign the paper version of this form for retention in their files) Curtis Brown	31. Signature (Enter the name of the person who will sign the paper version of this form for retention in their files) Brian Hill
<b>WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).</b>	

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

The public reporting for this collection of information is estimated to average 8 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0686), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

Remember - You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0686.

THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

## ATTACHMENT 1

### Joint International and Domestic Section 214 Application to Transfer Control of Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications

This joint application seeks Commission consent under Section 214 of the Communications Act of 1934, as amended (the "Act"), and Sections 63.04 and 64.24 of the Commission's rules<sup>1</sup> to transfer control of Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications ("Legacy" or "Transferor") to Jail Education Solutions, Inc. d/b/a Edovo ("Edovo" or "Transferee") (collectively the "Applicants"). Legacy holds an international Section 214 authorization as well as blanket Section 214 domestic operating authority. As explained further below, grant of the application serves the public interest.

#### I. RESPONSES TO QUESTIONS SET FORTH IN THE FCC 214 MAIN FORM

Responses to certain questions set forth in the application's FCC 214 Main Form are as follows:

##### Answers to Question 10

###### *Transferor Contact Information*

Curtis Brown  
President and Chief Executive Officer  
Legacy Long Distance International, Inc.  
10833 Valley View Street  
Suite 150  
Cypress, CA 90630  
Tel. 800-577-5534  
Fax 800-700-1116  
[cbrown@legacyinmate.com](mailto:cbrown@legacyinmate.com)

###### *With a copy to:*

Sharon R. Warren  
Consultant to Legacy Long Distance International,  
Inc.  
Technologies Management, Inc.  
151 Southhall Lane, Suite 450  
Maitland, FL 32751  
Tel. 407-740-3005  
Fax 407-740-0613  
[swarren@tminc.com](mailto:swarren@tminc.com)

###### *Transferee Contact Information*

Valerie Hedge  
In-House Counsel  
Jail Education Solutions, Inc.  
500 W. Madison Avenue  
Suite 801  
Chicago, IL 60661  
Tel. 773-263-0178  
[valerie@edovo.com](mailto:valerie@edovo.com)

###### *With a copy to:*

Brian Hill  
President and Chief Executive Officer  
Jail Education Solutions, Inc.  
500 W. Madison Avenue  
Suite 801  
Chicago, IL 60661  
Tel. 602-403-9905  
[brian@edovo.com](mailto:brian@edovo.com)

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<sup>1</sup> 47 U.S.C. § 214; 47 C.F.R. §§ 63.04, 64.24.

***Place of Organization***

Legacy is incorporated under the laws of the state of California. Edovo is incorporated under the laws of the state of Delaware.

***Prior International Section 214 Authorizations***

Legacy holds an international Section 214 authorization to provide global international resold services between the United States and international points pursuant to Section 63.18(e)(2) of the Commission's rules (File No. ITC-214-19961125-00596). Edovo does not hold any international Section 214 authorizations.

**Answer to Question 11**

Pursuant to Section 63.18(h) of the Commission's rules, the following individuals will directly or indirectly hold at least ten (10) percent of the equity interest of the transferee upon consummation of this transaction. *Exhibit A* contains a pre and post-transaction chart.

Name: Michael Krasny  
Address: 30 S. Wacker Drive  
Suite 2500  
Chicago, IL 60606  
Citizenship: USA  
Principal Business: Investor  
Ownership Interest: 10.10% of Jail Education Solutions, Inc. d/b/a Edovo

Name: **Brian Hill**  
Address: 500 W. Madison Avenue, Suite 801  
Chicago, IL 60661  
Citizenship: USA  
Principal Business: President and Chief Executive Officer  
Ownership Interest: 21.87% of Jail Education Solutions, Inc. d/b/a Edovo

**Answer to Question 12**

There are no interlocking directorates with a foreign carrier.

**Answer to Question 13**

***Description of Applicants***

The Transferor is Legacy Long Distance International, Inc. d/b/a Legacy Inmate Communications. Legacy is incorporated under the laws of the state of California and headquartered in Cypress, California. Curtis Brown, President and Chief Executive Officer currently holds a 79.76% ownership and voting interest in Legacy. George Hansell, Executive Vice President, currently holds a 20.12% ownership and voting interest in Legacy. Legacy is a full-service provider of inmate communications and investigative technology services at

hundreds of correctional facilities nationwide. Legacy's services include operator services, debit, and prepaid calling. Legacy is known for their outstanding service and support, their comprehensive technology and service offerings, and their user-centric and intuitive iCON inmate communications management system. Legacy also provides operator-assisted and direct dial calling services to coin-operated privately owned pay telephone providers. Legacy is also authorized by the FCC to provide domestic and international telecommunications services.

The Transferee is Jail Business Solutions, Inc. d/b/a Edovo. Edovo is incorporated under the laws of Delaware, with its corporate headquarters in Chicago, Illinois. Current ownership in Edovo consists of Brian Hill, President and Chief Executive Officer, with a 23.30% ownership, Sawdust Capital, LLC holds a 10.76% interest, Serious Change II LP holds a 10.37% interest, with the remaining 55.57% interest held by minority owners. Edovo provides secure tablet technology to correctional facilities to help better prepare and educate inmates for re-entry and improve public safety. Their mobile tablet solution provides over 10,000 hours of educational, vocational and treatment programming to the inmate population.

### ***Description of Transaction and Public Interest Statement***

Legacy and Edovo entered into a Stock Purchase Agreement dated January 27, 2017 (the "Agreement"). Pursuant to the Agreement, 100% of the membership interests of Legacy will be acquired by Edovo. Accordingly, upon consummation of the transactions contemplated by the Agreement (the "Proposed Transaction"), Legacy will become a direct wholly-owned subsidiary of Edovo. After the transaction, Curtis Brown and George Hansell will no longer have an ownership interest greater than ten (10) percent. Following the transaction, the following individuals will hold a ten (10) percent or greater equity interest in Edovo: Brian Hill – 21.87%, Michael Krasny - 10.10%, with the remaining 68.03% held by minority shareholders. *Exhibit A* to this application depicts the pre and post-organization charts. The Proposed Transaction is expected to close as soon as possible, subject to all regulatory approvals.

The Applicants submit that the Proposed Transaction is in the public interest, and will be seamless from the perspective of Legacy's customers. Legacy will remain a separate operating company, and will continue to be managed and operated by the same officers and personnel as is currently in place. The Proposed Transaction will allow the companies to combine their complementary services, and by combining resources the Applicants will be able to offer a fuller, more robust suite of solutions and services to its customers. The Proposed Transaction will further enhance the combined company's ability to compete more effectively in the highly competitive marketplace. The transaction will have no adverse impact on Legacy's customers, and Legacy will continue to provide high-quality services at the same rates and on the same terms and conditions as are currently in effect.

**Answer to Question 14**

Transferee certifies that they have no ownership in any foreign carrier, nor are they affiliated with any foreign carrier, nor will they become affiliated with any foreign carrier as a result of this transaction.

**Answer to Question 15**

Transferee certifies that they do not seek to provide international telecommunications services to any destination country where:

- (1) The Transferee is a foreign carrier in that country; or
- (2) The Transferee controls a foreign carrier in that country; or
- (3) Any entity owns more than 25 percent of the Transferee, or that controls the 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 the Transferee 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.

**Answer to Question 16**

Not applicable.

**Answer to Question 18**

Not applicable.

**Answer to Question 20**

Applicants respectfully submit that this application qualifies for streamlined processing pursuant to Section 63.12(a)-(b) of the Commission's Rules, 47 C.F.R. §63.12(a)-(b). In particular, Section 63.12(c)(1) is inapplicable because neither of the Applicants has any foreign carrier affiliates, and will have no such affiliates post-closing. They therefore qualify for a presumption of non-dominance under Section 63.10 of the Commission's rules on all U.S.-international routes.

**II. INFORMATION REQUIRED BY SECTION 63.04 OF THE FCC'S RULES IN RELATION TO TRANSFER OF BLANKET DOMESTIC SECTION 214 AUTHORITY**

In support of the applicants' request for consent to transfer control of Legacy to Edovo, the following information is submitted pursuant to Section 63.04 of the Commission's rules.<sup>2</sup> Specifically, Section 63.04(b) provides that applicants submitting a joint international/domestic Section 214 application should submit in an attachment to the international Section 214

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<sup>2</sup> 47 C.F.R. § 63.04.

application responses to the information requested in paragraphs (a)(6) through (a)(12) of Section 63.04:

**(a)(6) Description of the transaction:**

A description of the transaction is set forth in Section I above.

**(a)(7) Description of the geographic areas in which the applicants offer domestic telecommunications services, and what services are provided in each area:**

Legacy is an institutional services provider certificated, registered or otherwise authorized to provide service in all states except Kansas, Hawaii, North Dakota, Nevada, Ohio, and South Carolina. Edovo does not currently provide telecommunications services.

**(a)(8) Statement as to how the application qualifies for streamlined treatment:**

This application qualifies for streamlined treatment under Section 63.03(b) of the Commission's rules because: (1) the Transferee is not a telecommunications provider; (2) Legacy's market share of the interstate, interexchange market is significantly less than 10 percent; and (3) Legacy provides competitive telecommunications services exclusively in geographic markets served by a dominant local exchange carrier that is not a party to this transaction. Neither Applicant is dominant with respect to any telecommunications service offered in the United States.

**(a)(9) Identification of all other Commission applications related to this transaction:**

No other Commission applications are related to this transaction.

**(a)(10) Statement of whether the applicants request special consideration because either party is facing imminent business failure:**

The applicants request no special consideration of this application for reasons relating to imminent business failure.

**(a)(11) Identification of any separately filed waiver requests being sought in conjunction with this transaction:**

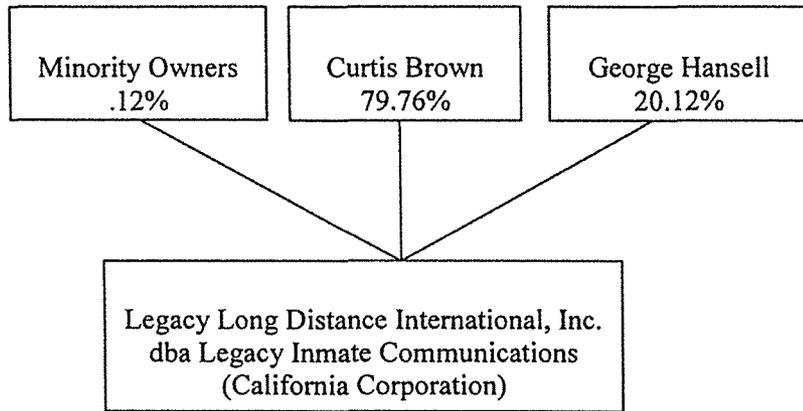
The applicants seek no separately filed waiver requests in conjunction with this transaction.

**(a)(12) Statement showing how grant of the Application will serve the public interest, convenience and necessity:**

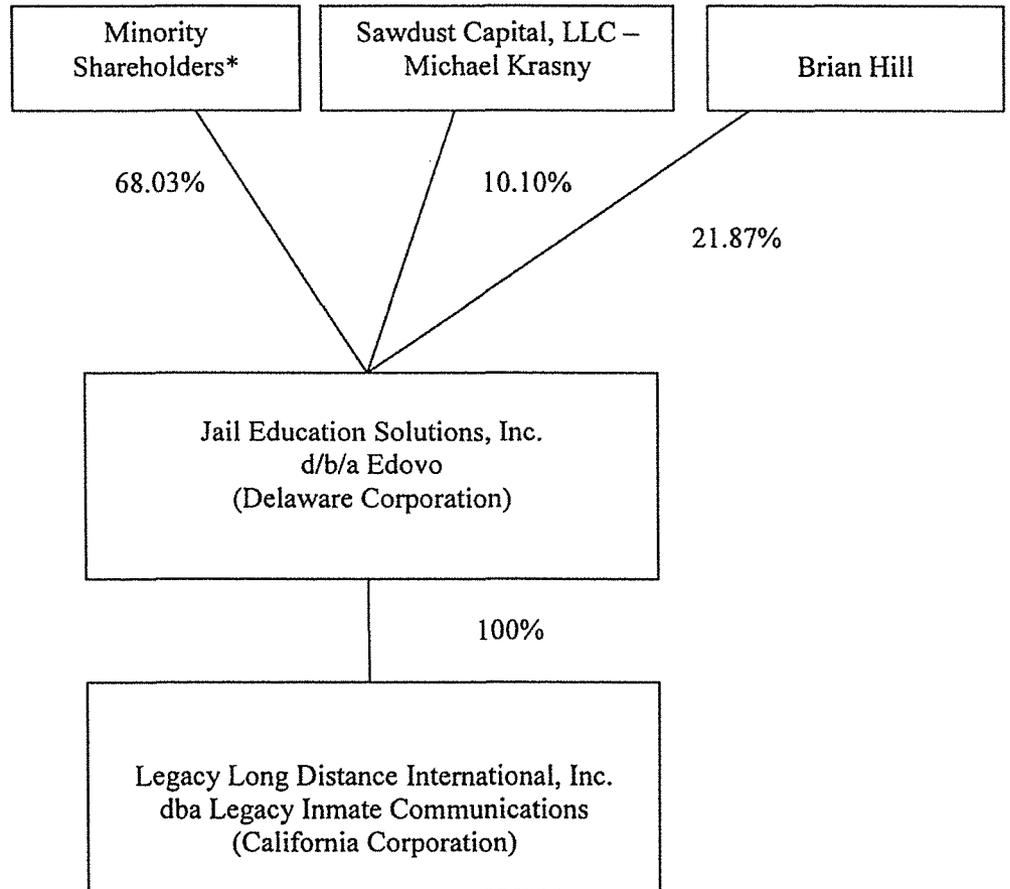
A demonstration of how the grant of Application serves the public interest, convenience and necessity is set forth in Section I above.

EXHIBIT A

PRE- ORGANIZATION CHART



POST- ORGANIZATION CHART



\*- to include prior shareholders of Legacy Long Distance International, Inc.