

# ***Pinpoint Minnesota, LLC***

May 1, 2019

By Electronic Filing

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: Docket No. 00-257: Notification of Acquisition of Customers**

Dear Ms. Dortch:

Pinpoint Minnesota, LLC (“Pinpoint”) hereby notifies the Federal Communications Commission (“Commission”) of its intent to acquire all of the customer base of County of Lake, Minnesota (“Lake”), as described more fully below. Pinpoint does not believe that Section 64.1120(e) of the Commission’s Rules, 47 CFR § 64.1120(e), applies to the acquisition because Lake provides interconnected Voice over Internet Protocol (“VoIP”) service to the customers being acquired by Pinpoint. In addition, following the transaction, Pinpoint will provide interconnected VoIP service to the customers. The Commission has not determined whether interconnected VoIP services are telecommunications services and has not yet ruled that the Commission’s carrier change rules apply to interconnected VoIP services.<sup>1</sup> Nonetheless, Pinpoint has complied with the customer notification requirements of Section 64.1120(e) out of an abundance of caution.

**Names of the Parties to the Transaction:** The parties to the transaction are: Lake, the transferor, and Pinpoint, the transferee.

**Types of Telecommunications Services Provided to Affected Customers:** Lake provides interconnected VoIP services to the County of Lake, Minnesota. Lake will transfer all of its customer base located in the County of Lake to Pinpoint.

**Date of Transfer:** June 3, 2019.

**Certification of Compliance:** Pinpoint certifies that it has complied with the Commission’s requirement to provide advance customer notice in accordance with Section 64.1120(e)(3) and with the obligations specified in that notice.

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<sup>1</sup> See *Protecting Consumers from Unauthorized Carrier Changes and Related Unauthorized Charges*, Report and Order, Docket No. CG 17-169, FCC 18-78, ¶ 3, n.2 (“VoIP providers and Commercial Mobile Radio Service providers are not subject to the slamming verification rules”) (2018).

**Copy of Notice Sent to Affected Subscribers:** Attached hereto is a sample of the customer notification letter that was sent to customers on April 30, 2019, more than 30 days prior to the anticipated transfer date.

Please direct any questions regarding this matter to Tom Shoemaker at 308-695-8667 or via email at [tom.shoemaker@pnpt.com](mailto:tom.shoemaker@pnpt.com).

Respectfully yours,

A handwritten signature in black ink, appearing to read "B. Khelmatov", followed by a stylized flourish.

Title: President

## Exhibit A

### Certification

On behalf of Pinpoint Minnesota, LLC ("Pinpoint") and in accordance with Section 64.1120(e) of the Commission's Rules, 47 C.F.R. § 64.1120(e), I hereby certify under penalty of perjury that I have read the foregoing notification and that the statements contained therein are true, complete and correct to the best of my knowledge, information and belief. I further certify that, with respect to the transfer to Pinpoint, of the affected customers of County of Lake, Minnesota, Pinpoint has complied with the Commission's requirements to provide advance customer notice in accordance with Section 64.1120(e)(3) and with the obligations specified in that notice.

By: B. Khelmatov

Title: President

Date: May 1, 2019