

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

Application of
Alvin E. Kimble and I. V. Jeansonne,
Transferors,
and
Direct Communications Rockland, Inc.,
Transferee,
For Consent for Transfer of Control

WC Docket No. _____

APPLICATION FOR CONSENT FOR TRANSFER OF CONTROL

Pursuant to Section 214 of the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. § 214, and Section 63.04 of the Commission's rules, 47 C.F.R. § 63.04, Alvin E. Kimble and I. V. Jeansonne (the "Transferors") and Direct Communications Rockland, Inc. ("Direct Communications" or the "Transferee"), with Transferors and Direct Communications together constituting the "Applicants," hereby apply for Commission consent to transfer control of Commission licensees, which will result from Direct Communications' proposed acquisition from the Transferors of 100 percent of the stock of Star Telephone Company, Inc. ("Star Telephone"), which provides local exchange, exchange access and long distance telecommunications service in Louisiana.

The proposed transaction contemplates acquisition of all of the stock of Star Telephone by Direct Communications. This will place Direct Communication in control of Star Telephone. Star Telephone currently serves fewer than two percent (2%) of the nation's access lines. With the acquisition, Direct Communications will also serve fewer than two percent (2%) of the nation's access lines.

Direct Communications is in the telecommunications business in the State of Idaho, but not in the State of Louisiana. Direct Communications holds no other operating companies.

Since this acquisition is a stock acquisition, service to customers will be provided at substantially the same rates, terms and conditions as are in effect today. Therefore, the proposed transaction will be largely transparent to existing customers. For these reasons, and for the reasons detailed below, the transaction will serve the public interest and the Commission should grant this Application on a streamlined basis.

In accordance with the requirements of Section 63.04 of the Commission's rules, the Applicants provide the following information:

- (1) Name, address, and telephone number of each applicant:

Transferors:

Mr. Alvin E. Kimble
Mr. I. V. Jeansonne
7266 Tom Drive
Baton Rouge, LA 70806
(225) 926-0327

Transferee:

Direct Communications Rockland, Inc.
Mr. Jeremy Smith
150 S. Main
P.O. Box 270
Rockland, ID 83271
(208) 548-2345
E-mail: Jeremy@directcom.com

(2) State under the laws of which each Applicant is organized:¹

Transferors are individuals domiciled in the State of Louisiana. Direct Communications is a corporation organized under the laws of the State of Idaho.

(3) Legal counsel to whom correspondence concerning the application is to be addressed:

For Transferors:

Linda Perez Clark
Kean Miller LLP
400 Convention Street, Suite 700
Baton Rouge, LA 70802
(225) 389-3714

For Transferee:

Richard A. Finnigan
Law Office of Richard A. Finnigan
2112 Black Lake Blvd SW
Olympia, WA 98512
(360) 956-7001

(4) Name, address, citizenship, and principal business of entities that own at least 10 percent of the equity of the Applicants (to the nearest 1 percent):

For Transferors:

Star Telephone is owned as follows:

Mr. Kimble is a citizen of the USA and owns 50% of the stock of Star Telephone. Mr. Kimble's address is 7266 Tom Drive, Baton Rouge, LA 70806. Mr. Kimble's principal business is telecommunications.

Mr. Jeansonne is a citizen of the USA and owns 50% of the stock of Star Telephone. Mr. Jeansonne's address is 7266 Tom Drive, Baton Rouge, LA 70806. Mr. Jeansonne's principal business is telecommunications.

¹ Star Telephone is a corporation organized under the laws of the State of Louisiana.

No other person or entity owns a 10 percent or more interest, direct or indirect, in Star Telephone.

For Transferee:

Direct Communications is owned as follows:

Leonard May

Address: 150 S Main Street, Rockland, ID 83271

Business: Telecommunications

Citizenship: USA

Equity: 35%

Marilyn May

Address: 150 S Main Street, Rockland, ID 83271

Business: Telecommunications

Citizenship: USA

Equity: 35%

No other person or entity owns a 10 percent or more interest, direct or indirect, in Direct Communications.

(5) Certification pursuant to Sections 1.2001 through 1.2003 that no party to the application is subject to a denial of Federal benefits:

By their signatures below, the Applicants certify that no party to the application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

(6) Description of the transaction:

On May 1, 2017, Direct Communications entered into an Agreement for Purchase and Sale of Stock with Transferors, to acquire the stock of Star Telephone. Pursuant to the Agreement, Direct Communications will acquire a 100 percent equity

interest in Star Telephone for \$16,990,061 in cash, adjusted plus or minus for various balance sheet entries on day of closing.

(7) Description of the geographic areas in which the Transferor and Transferee (and their affiliates) offer domestic telecommunications services, and what services are provided in each area:

Star Telephone, provides local exchange, exchange access and long distance telecommunications services in Louisiana. Direct Communications provides telecommunications service in Idaho. There is no overlap of service territory and the services areas are not adjacent to one another.

(8) Statement on how the application fits into one or more of the presumptive streamlined categories or why it is otherwise appropriate for streamlined treatment:

This application is eligible for presumptive streamlined treatment under Section 63.03(b)(2)(iii) of the Commission's rules, or in the alternative, is otherwise appropriate for streamlined treatment.

Under Section 63.03(b)(2)(iii), the Commission's streamlined procedures are presumed to apply where "the applicants are incumbent independent local exchange carriers ... that have, in combination, fewer than two (2) percent of the nation's subscriber lines installed in the aggregate nationwide, and no overlapping or adjacent service areas."² Star Telephone is an incumbent local exchange carrier which serves fewer than two (2) percent of the nation's subscriber lines. Upon acquisition of the stock of Star Telephone, Direct Communications will be an incumbent local exchange carrier serving fewer than two (2) percent of the nation's subscriber lines. In addition, since

² 47 C.F.R. § 63.03(b)(2)(iii).

there are no overlapping service areas and no adjacent service territories, the proposed transaction accordingly falls within the presumptively streamlined category.

Alternatively, streamlined treatment is appropriate under the Commission's "case-by-case approach."³ Indeed, the Commission has adopted a "general rule in which all applications are eligible for streamlined processing," finding that such general eligibility for streamlined processing "best reduces regulatory burdens on domestic telecommunications carriers, while at the same time ensuring that we continue to serve the public interest under section 214 of the Communications Act."⁴

This application should be subject to streamlined processing because it involves only a transfer of equity interests, and presents no "novel questions of fact, law, or policy which cannot be resolved under outstanding precedents and guidelines."⁵ As noted above (and discussed more fully below), this application presents no competitive or public interest concerns. Upon completion of the proposed transactions, Star Telephone Company will continue to provide service at substantially the same rates, terms and conditions as are in effect today. No customer will lose service or be adversely affected as a result of the proposed transaction. Because this transaction poses no competitive concerns and raises no novel issues, this application is appropriate for streamlined treatment.

(9) Identification of all other Commission applications related to the same transaction:

³ *Implementation of Further Streamlining Measures for Domestic Section 214 Authorizations*, Report and Order, 17 FCC Rcd 5517 ¶34 (2002) ("*Streamlining Order*"); see also 47 C.F.R. § 63.03(a) (permitting streamlining "[u]pon determination ... that the application is appropriate for streamlined treatment").

⁴ *Streamlining Order* ¶34.

⁵ *Id.* ¶28.

None.

(10) Statement whether the applicants are requesting special consideration because either party to the transaction is facing imminent business failure:

The Applicants are not requesting special consideration of the application.

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

The Applicants do not seek any waivers from the Commission in conjunction with this transaction.

(12) A 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:

This proposed transaction will serve the public interest because it will provide benefits to customers without any countervailing harms. The owners of Star Telephone are seeking to retire from the telecommunications business in the State of Louisiana. Direct Communications will bring vigorous ownership with sufficient financial resources to meet the needs of Star Telephone's customers.

In contrast to the substantial potential benefits, the proposed transaction poses no countervailing harms. The proposed transaction contemplates only a change of equity ownership. Upon consummation of the proposed transaction, Star Telephone will continue to provide service at substantially the same rates, terms and conditions as are in effect today. There will be no reduction, impairment, or discontinuance of service to any

customer as a result of the proposed transaction. Because of this, the proposed transaction will be largely transparent to Star Telephone's current customers.

For all of the foregoing reasons, the proposed transaction will serve the public interest and this application should be granted on a streamlined basis.

Payment in the amount of \$1,155 was transmitted to the Federal Communications Commission via the Commission's Fee Filer system. Please contact the undersigned with any inquiries concerning this Application.

Respectfully submitted this 12th day of May, 2017.



Linda Perez Clark
Kean Miller LLP
400 Convention Street, Suite 700
Baton Rouge, LA 70802

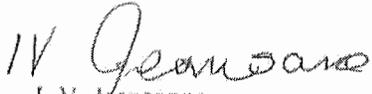


Richard A. Finnigan
Law Office of Richard A. Finnigan
2112 Black Lake Blvd SW
Olympia, WA 98512

We hereby verify on behalf of Transferee and Transferors that the foregoing is true and correct to the best of our knowledge.

Transferors:


Alvin E. Kimble


L. V. Jeansonne
7266 Tom Drive
Baton Rouge, LA 70806

Transferee:

Direct Communications Rockland, Inc.

By:



Jeremy Smith

Its: Vice President

150 S. Main

P.O. Box 270

Rockland, ID 83271