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July 26, 2019

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Attn: Wireline Competition Bureau

RE: Application of Combined Public Communications, LLC for Consent To Transfer Customers

Dear Secretary Dortch,

Attached please find for filing Combined Public Communications, LLC's Application for Consent to Transfer Control of a Company Holding Blanket Domestic Section 214.

The applicable credit card payment in the amount of \$1,195.00, which satisfies the filing fee required under the Commission's rules, is being submitted electronically. All correspondence and inquiries in connection with this filing should be forwarded to the undersigned.

Respectfully submitted,

/s/ Lance J.M. Steinhart

Lance J.M. Steinhart
Managing Attorney
Lance J.M. Steinhart, P.C.
Attorneys for Combined Public Communications, LLC

)	
In the Matter of)	
)	
Infinity Networks, Inc.)	WC Docket No. _____
Assignor,)	
)	
and)	
)	
Combined Public Communications, LLC)	
Assignee,)	
)	
For Consent To Transfer Customers of Company)	
Subject to Blanket Domestic Authority)	
)	

APPLICATION

Pursuant to Section 214 of the Communications Act of 1934, as amended (the “Act”), 47 U.S.C. § 214, and Sections 63.01, 63.03 and 63.04 of the Federal Communications Commission’s (the “Commission”) rules, 47 C.F.R. §§ 63.01, 63.0 and 63.04 Combined Public Communications, LLC (“Combined Public”) (the “Applicant”) hereby respectfully requests Commission consent for the transfer of customers from Infinity Networks, Inc. (“Infinity”) to Combined Public.

Effective February 26, 2018¹, three inmate communications services agreements for facilities in the State of Alabama were assigned by Infinity to Combined Public (the “Transaction”) pursuant to a Bill of Sale, Assignment and Assumption Agreement by and between Infinity and Combined Public (the “Agreement”).

I. REQUEST FOR STREAMLINED TREATMENT

The Applicant respectfully requests streamlined treatment of this Application pursuant to Section 63.03 and of the Commission’s rules, 47 C.F.R. §§ 63.03. This Application is eligible for streamlined processing pursuant to Section 63.03(b)(2) of the Commission’s rules because (i) the Transaction resulted in Combined Public, the transferee, having a market share in the interstate, interexchange market of less than 10 percent; (ii) Combined Public will provide competitive telephone exchange services or exchange access services (if at all) exclusively in geographic areas served by a dominant local exchange carrier that is not a party to the Transaction; and (iii) neither the Applicant nor any of its affiliates are regulated as dominant with respect to any service

Unfortunately, the Applicant did not seek timely Commission approval of the Transaction. The oversight was inadvertent and unintentional. As soon as this failure came to the Applicant’s attention, the Applicant took steps to remedy the noncompliance to the extent

¹ The Applicant is concurrently filing a request for Special Temporary Authority with the Wireline Competition Bureau for authority to continue providing services to customers pending approval of this Application.

possible by seeking Special Temporary Authority (“STA”), attached hereto as Exhibit A, for the continued provision of service to customers. The Applicant had sent drafts of this Application and the STA to Infinity, however, Infinity has been non-responsive. The Applicant regrets this oversight and has taken steps to ensure compliance with all applicable Commission requirements going forward.

The Applicant requests expeditious approval of the assignments which would serve the public interest by allowing customers to continue to receive competitive services from Combined Public without interruption. As a competitive provider of inmate telephone services, Combined Public is well qualified to provide the domestic services to the acquired customers.

II. DESCRIPTION OF THE APPLICANT AND ASSIGNOR

A. Infinity Networks, Inc. (FRN: 0022146591) (the information in this Application regarding Assignor is based upon the Assignee’s information and belief, and publicly available records)

Infinity is a Louisiana corporation with headquarters located at 8500 Shoal Creek Blvd., Suite 100, Austin, Texas 78757. Infinity has blanket authority to provide interstate telecommunication services. Infinity provides or is authorized to provide inmate telephone services to correctional facilities in Alabama, Florida, Georgia, Idaho, Louisiana, Mississippi and Texas.

B. Combined Public Communications, LLC (FRN: 0004327656)

Combined Public is a Delaware limited liability company with headquarters located at 100 Aqua Drive, Cold Spring, Kentucky 41076. Combined Public has authority to provide interstate

and international telecommunication services.² Combined Public specializes in the provision of inmate communications services and has appropriate state certifications in Alabama, Colorado, Florida, Georgia, Indiana, Iowa, Kansas, Kentucky, Mississippi, Missouri, Nebraska, North Carolina, Ohio, South Carolina, Tennessee, and Wyoming.

III. DESCRIPTION OF THE TRANSACTION

The Transaction was a sale, assumption and assignment agreement under which Combined Public acquired three inmate communications services agreements for facilities in the State of Alabama. Customers continue to be serviced by Combined Public on substantially the same terms and conditions as previously provided by Infinity. The consummation of the Transaction did not result in an interruption, reduction, loss or impairment of services to any customer.

The Transaction did not result in a reduction or impairment of service to Infinity's customers. As more fully described below in the public interest statement, Combined Public continues to provide a high level of technical operations and customer service to Infinity's customers.

The Transaction raises no competitive issues. Combined Public continues to compete with other local providers of inmate telecommunication services.

No radio licenses were included in the Transaction. No foreign carrier affiliations resulted from this Transaction, and consumers will not be harmed. Infinity will continue to provide domestic services.

IV. PUBLIC INTEREST STATEMENT

Approval of the Transaction will serve the public interest, convenience, and necessity as it will permit the continued, uninterrupted provision of high-quality service to customers.

² File No. ITC -214-20101119-00450 granting authority to provide resale services granted December 10, 2010.

Approval will also promote competition in the inmate telecommunications marketplace. The effect of the Transaction and transfer of customers from Infinity to Combined Public has not resulted in an interruption, reduction, loss or impairment of services to any customer. Further, the Applicant is not aware of any harm to customers or to the market that has occurred as a result of the Transaction. The continued provision of service by Combined Public will provide customers the positive benefit of access to existing and new product offerings. The Transaction is transparent to customers and will not have a negative impact on the public interest, services to customers, or competition.

V. INFORMATION REQUIRED BY SECTION 63.24(e) OF THE COMMISSION'S RULES

In support of this Application, the Applicant submits the following information pursuant to Section 63.24(e) of the Commission's rules:

(a) Name, address, and telephone number of Assignor and Assignee.

Assignor:

Infinity Networks, Inc.
Attn: William Bell, President
8500 Shoal Creek Blvd., Suite 100
Austin, TX 78757
Telephone: (866) 681-2948
FRN: 0022146591

Assignee:

Combined Public Communications, LLC
Attn: Josh Welk, CFO
100 Aqua Drive, Cold Spring, KY 41076
Telephone: (859) 652-9972
FRN: 0004327656

(b) State under the laws of which each applicant is organized.

Infinity is a Corporation organized under the laws of the State of Louisiana. Combined Public is a limited liability company organized under the laws of the State of Delaware.

(c) Name, title, address, and telephone number of legal counsel for Combined Public.

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VI. INFORMATION REGARDING DOMESTIC TRANSFER OF CONTROL

Pursuant to Section 63.04 of the Commission's Rules, 47 C.F.R. § 63.04(b), the Applicant respectfully requests authority to permit the transfer certain customers to Combined Public. Applicant provides the following information in support of its request:

(a) § 63.04(a)(6) Description of the Transaction.

The Applicant describes the Transaction in Section II of this Application.

(b) § 63.04(a)(7) Geographic Areas Served and Services Provided.

The Applicant describes the geographic areas in which they offer domestic telecommunications services and the services that are provided in each area in Sections I and II of this Application.

(c) § 63.04(a)(8) Statement Regarding Streamlined Treatment.

The Applicant's Section 214 assignment application is eligible for streamlined processing pursuant to Section 63.03(b)(2), 47 C.F.R. § 63.03(b)(2), of the Commission's rules because: (i) the Transaction resulted in Combined Public, the assignee, having a market share in the interstate interexchange market of less than 10 percent; (ii) Combined Public will provide competitive telephone exchange services exclusively in geographic areas served by a dominant local exchange

VII. CONCLUSION

Based on the foregoing, the Applicant respectfully requests that the Commission grant this Application and consent to the transfer of customers from Infinity to Combined Public to allow the transition and uninterrupted provision of services to customers.

Respectfully submitted,

/s/ Lance J.M. Steinhart

Lance J.M. Steinhart, Esq.
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Attorneys for Applicant

Dated: July 26, 2019

EXHIBIT A

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

Application for Consent to Transfer Customers

Lance J.M. Steinhart, P.C.
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1725 Windward Concourse
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Alpharetta, Georgia 30005

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July 29, 2019

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

Re: Infinity Networks, Inc. and Combined Public Communications, LLC,
Request for Special Temporary Authorization

Dear Secretary Dortch,

Pursuant to 47 U.S.C. § 214, and Section 63.24 of the Commission's Rules, 47 C.F.R. § 63.24, Combined Public Communications, LLC ("Combined Public") (the "Applicant"), hereby respectfully requests Special Temporary Authority ("STA") so that Combined Public may continue to service the acquired customers pending Commission approval of its Section 214 Application, filed concurrently herewith, for assignment of certain customers of Infinity Networks, Inc. ("Infinity") to Combined Public (the "Application").

Effective February 26, 2018, three inmate communications services agreements for facilities in the State of Alabama were assigned by Infinity to Combined Public (the "Transaction") pursuant to a Bill of Sale, Assignment and Assumption Agreement by and between Infinity and Combined Public (the "Agreement"). The Transaction resulted in a transfer of certain customers, *see* 47 C.F.R. §§ 63.01, 63.03, and 63.04.

Unfortunately, the Applicant did not seek timely Commission approval of the Transaction. The oversight was inadvertent and unintentional. Unfortunately, Infinity and Combined Public did not seek timely Commission approval of the Transaction. The oversight was inadvertent and unintentional. As soon as this failure came to the Combined Public's attention, the Applicant took steps to remedy the noncompliance. The Applicant regrets this oversight and has taken steps to ensure compliance with all applicable Commission requirements going forward.

Grant of the STA will serve the public interest by permitting the continued, uninterrupted provision of service to customers while the Commission reviews the Application. Grant of the STA also will promote competition in the inmate telephone services marketplace. Without discounting the regulatory obligation to obtain prior approval, the Applicant notes that no harm to customers or to the market occurred as a result of Applicant's oversight.

The Applicant requests temporary authority for sixty (60) days while the Application is pending. The Applicant acknowledges that the grant of this STA will not prejudice any action the Commission may take on the Application, and that once granted, the STA may be revoked on the Commission's own notice, without a hearing. The Applicant further acknowledges that grant of the STA will neither preclude nor dictate the scope of any enforcement action related to the Transaction.

This filing with the Wireline Competition Bureau and the applicable credit card payment in the amount of \$1,195.00, which satisfies the filing fee required under the Commission's rules, are being submitted electronically. All correspondence and inquiries in connection with this filing should be forwarded to the undersigned.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Respectfully submitted,

/s/ Lance J.M. Steinhart

Lance J.M. Steinhart
Managing Attorney
Lance J.M. Steinhart, P.C.
Attorneys for Combined Public Communications, LLC

EXHIBIT B
CERTIFICATION

CERTIFICATION

I, Josh Welk, hereby state under penalty the perjury that I am the Chief Financial Officer of Combined Public Communications, LLC, that I have reviewed the foregoing Application and know the contents thereof, and that the statements made therein are true and correct to the best of my knowledge and belief.

Dated: July 17, 2019

A handwritten signature in black ink, appearing to read 'Josh Welk', written over a horizontal line.

Josh Welk
Combined Public Communications, LLC
CFO