

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

In the Matter of)	
)	
Pattersonville Telephone Company and)	
Pattersonville Telephone Company d/b/a)	WC Docket No. 20-_____
PTC Connect)	
)	
Application for Authorization Pursuant to)	
Section 214 of the Communications Act of 1934,)	
as Amended, for Transfer of Control)	

APPLICATION FOR TRANSFER OF CONTROL

Pattersonville Telephone Company (“Pattersonville”) on behalf of itself and its separate operating division, Pattersonville Telephone Company d/b/a PTC Connect (“PTC Connect), along with the three owners of Pattersonville (Wayne S. Thomas, Linda B. Thomas and Tammy T. Krisher, each a United States Citizen) (collectively the “Applicants”), pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214 (the “Act”), and Section 63.04 of the rules of the Federal Communications Commission (the “Commission”), 47 C.F.R. §63.04, hereby request authority to transfer control of Pattersonville, and thus PTC Connect, as outlined herein. This Application presumptively qualifies for streamlined processing pursuant to Sections 63.03(b)(1)(ii) and 63.03(b)(2)(iii) of the Commission's Rules, 47 C.F.R. §§63.03(b)(1)(ii) and 63.03(b)(2)(iii).

I. Background and Proposed Transfer

Pattersonville is a rural incumbent local exchange carrier operating in portions of Montgomery and Schenectady Counties within the State of New York, just outside the cities of Amsterdam and Schenectady, New York. Pattersonville provides local exchange, exchange access service to approximately 457 access lines in this rural area and also provides wholesale

broadband access services to PTC Connect. PTC Connect, a separate corporate operating division of Pattersonville, provides domestic resold long distance in and around the area of Pattersonville and also provides retail broadband services in the same area.

This application proposes the transfer of control of the Section 214 authorization held by Pattersonville and PTC Connect based on a transfer of Pattersonville stock from Wayne S. Thomas and his wife, Linda B. Thomas to their daughter, Tammy T. Krisher. Post consummation, Pattersonville and PTC Connect will continue to exist and operate under the same names, and provide service pursuant to their then-existing rates, terms and conditions. No carrier change charges are associated with the transaction, and no customer service or billing contact information will change as a result of the transfer. The transaction will not affect customers' preferred carrier freezes. Accordingly, the proposed transactions will be transparent to consumers.

II. Section 64.04(a) Information

In support of this request, the Applicants show the following information required by Section 64.04(a) of the Commission's Rules, 47 C.F.R. §64.04(a):

1. The name, address and telephone number of each applicant - 47 C.F.R. § 63.04(a)(1).

Pattersonville Telephone Company
Pattersonville Telephone Company d/b/a PTC Connect
1309 Main Street, PO Box 240
Rotterdam Junction, New York 12150
Telephone Number: 518-887-2121

Mr. Wayne S. Thomas, Treasurer
Pattersonville Telephone Company
1309 Main Street, PO Box 240
Rotterdam Junction, New York 12150
Telephone Number: 518-887-2121

Ms. Linda B. Thomas, Secretary
Pattersonville Telephone Company
1309 Main Street, PO Box 240
Rotterdam Junction, New York 12150
Telephone Number: 518-887-2121

Ms. Tammy T. Krisher, President
Pattersonville Telephone Company
1309 Main Street, PO Box 240
Rotterdam Junction, New York 12150
Telephone Number: 518-887-2121

2. The government, state, or territory under the laws of which each corporate or partnership applicant is organized - 47 C.F.R. § 63.04(a)(2).

Pattersonville Telephone Company is organized under the laws of the State of New York.

PTC Connect operates as a "d/b/a" under the laws of the State of New York. Mr. Thomas, Ms.

Thomas and Ms. Krisher are each citizens of the United States.

3. The name, title, post office address, and telephone number of the officer or contact point, such as legal counsel, to whom correspondence concerning the application is to be addressed - 47 C.F.R. § 63.04(a)(3).

For Pattersonville:

Ms. Tammy T. Krisher, President
Pattersonville Telephone Company
1309 Main Street, PO Box 240
Rotterdam Junction, New York 12150
Telephone Number: 518-887-2121
Email: tkisher@ptcconnect.net

with a copy to:

Thomas J. Moorman
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Telephone: (202) 944-9502
Email: tmoorman@woodsaitken.com

4. The name, address, citizenship and principal business of any person or entity that directly or indirectly owns at least ten (10) percent of the equity of the applicant, and the percentage of equity owned by each of those entities (to the nearest one (1) percent) - 47 C.F.R. § 63.04(a)(4).

Current Ten Percent (10%) or Greater Equity Owners of Pattersonville:

<u>Name and Address</u>	<u>Total Equity</u>	<u>Principal Business</u>
Mr. Wayne S. Thomas Pattersonville Telephone Company 1309 Main Street, PO Box 240 Rotterdam Junction, New York 12150	54%	Retired Telecommunications Management
Ms. Linda B. Thomas Pattersonville Telephone Company 1309 Main Street, PO Box 240 Rotterdam Junction, New York 12150	39%	Homemaker

Wayne S. Thomas and Linda B. Thomas are husband and wife and citizens of the United States.

Post Consummation Ten Percent (10%) or Greater Equity Owners of Pattersonville:

<u>Name and Address</u>	<u>Total Equity</u>	<u>Principal Business</u>
Ms. Tammy T. Krisher Pattersonville Telephone Company 1309 Main Street PO Box 240 Rotterdam Junction, New York 12150	93% (approx.) ¹	Telecommunications Management

Tammy T. Krisher is a citizen of the United States and the daughter of Wayne S. Thomas and Linda B. Thomas.

¹ Currently, sixty (60) share in Pattersonville are jointly owned by Ms. Krisher and her husband, William S. Krisher. Mr. Krisher is a citizen of the United States. Post-consummation, these shares will remain in both of their names. The percentage noted above will be the post-consummation stock percentage held only by Ms. Krisher.

5. **Certification pursuant to §§ 1.2001 through 1.2003 of this chapter that no party to the joint application is subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988. See 21 U.S.C. § 853 - 47 C.F.R. § 63.04(a)(5).**

Applicants certify, pursuant to 47 C.F.R. §§ 1.2001-1.2003, that to the best of their knowledge, information, and belief, no party to the Application is subject to denial of federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

6. **A description of the transaction - 47 C.F.R. § 63.04(a)(6).**

Subject to the receipt of the necessary regulatory approvals, Wayne S. Thomas and Linda B. Thomas will transfer their stock ownership via gift to their daughter, Tammy T. Krisher.

7. **A 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 - 47 C.F.R. § 63.04(a)(7).**

As indicated above, Pattersonville is a rural incumbent local exchange carrier operating approximately 457 access lines in this rural area and provides local exchange, exchange access service in addition to providing whole broadband access services to PTC Connect. PTC Connect provides domestic resold long distance in and around the area of Pattersonville and also provided retail broadband services in the same area. Post-consummation of the proposed transaction, Pattersonville and PTC Connect will continue to provide the same services they do today pursuant to their then-existing rates, terms and conditions.

8. **A statement as to how the application fits into one or more of the presumptive streamlined categories in this section or why it is otherwise appropriate for streamlined treatment - 47 C.F.R. § 63.04(a)(8).**

Applicants request streamlined treatment of this Application in accordance with Section 63.03(b)(1)(ii) and 63.03(b)(2)(iii). Mr. Thomas and Ms. Thomas are not telecommunications providers nor is Ms. Krisher. The proposed transaction envisions the transfer of corporate control via stock transfers to Ms. Krisher. Pattersonville operations serves fewer than two (2)

percent of the nation's subscriber lines installed in the aggregate nationwide,² and the transaction will result in no new overlapping or adjacent service areas with another incumbent local exchange carrier.

9. Identification of all other Commission applications related to the same transaction - 47 C.F.R. § 63.04(a)(9).

No other application is planned to be submitted in connection with this transaction.

10. A statement of whether the applicants are requesting special consideration because either party to the transaction is facing imminent business failure - 47 C.F.R. §§ 63.04(a)(10).

Applicants are not facing imminent business failure.

11. Identification of any separately filed waiver requests being sought in conjunction with the transaction - 47 C.F.R. §§ 63.04(a)(11).

None.

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 - 47 C.F.R. § 63.04(a)(12).

Applicants respectfully submit that a grant of this application for the transfer of control of Pattersonville is in the public interest. Upon consummation of the contemplated transaction, Pattersonville and PTC Connect will continue to provide the same high quality, modern services to their current respective subscribers as those provided today, and will do so in a manner that will render the transfers for which authorization is sought herein transparent to their respective subscribers. While as part of the transaction the control of Pattersonville will change, local

² As of December 31, 2018, the Commission reported that the retail switched access lines were approximately 43,512,000 nationwide. *See Voice Telephone Services: Status as of December 31, 2018* (Industry Analysis and Technology Division, Wireline Competition Bureau, March, 2020), Figure 1 (page 2). Pattersonville's approximate 457 access lines are far less than 2% of the access lines reported by the Commission.

management and ownership will continue, thus resulting in what is anticipated to be continued customer responsiveness.

III. Conclusion

For the foregoing reasons, the Applicants respectfully request that the Commission promptly grant this Application.

July 30, 2020

Respectfully submitted,

**Pattersonville Telephone Company and
Pattersonville Telephone Company d/b/a PTC
Connect**

By: Tammy Krishna
Tammy T. Krishna, President
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and in her individual capacity

By: Wayne S. Thomas
Wayne S. Thomas, Treasurer
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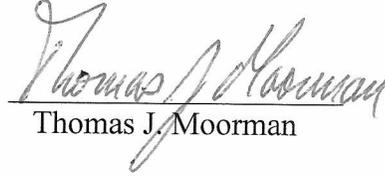
and in his individual capacity

By: Linda B. Thomas
Linda B. Thomas, Secretary
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and in her individual capacity

CERTIFICATE OF SERVICE

I, Thomas J. Moorman, of Woods Aitken LLP, 5335 Wisconsin Avenue, N.W., Suite 950, Washington, DC 20015, do hereby certify that on this 30th day of July, 2020, the foregoing "Application for Transfer of Control" was mailed, first class postage prepaid, to the following:


Thomas J. Moorman

The Honorable Andrew M. Cuomo
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