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August 20, 2019

**VIA ECFS**

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

Re: Bealls Communication Group, LLC and Combined Public Communications, LLC,  
Request for Extension of Special Temporary Authorization  
WC 19-182

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, Bealls Communication Group LLC ("Bealls") along with Combined Public Communications, LLC ("Combined Public") (collectively, the "Applicants"), hereby respectfully request extension of the Special Temporary Authority ("STA Extension") originally granted June 26, 2019, so that Combined Public may continue to service newly acquired business pending Commission approval of their joint section 214 application, filed concurrently herewith, for assignment of domestic authorization and for transfer of control of Bealls to Combined Public (the "Joint Application").

*Request for Domestic STA Extension; Good Cause*

The Applicants respectfully request an extension of the Domestic STA granted on June 26, 2019. The Applicants submit that good cause exists for extending the Domestic STA on the basis that additional time is needed because the underlying Transfer of Control application remains under review.

## *Background*

A combined Joint Application for approval of the transfer of control was filed on June 25, 2019, and is currently pending before the Commission.

Effective May 31, 2017, 100% of the membership interest of Bealls was transferred to Combined Public (the “Transaction”) utilized to provide inmate telecommunications services to certain jails and detention centers in Alabama, Florida and Georgia pursuant to a Membership Interest Sale and Assumption Agreement dated May 30, 2017 by and between Pezold Management Associates, Inc. (the “Seller”) and Combined Public (the “Agreement”). The Transaction resulted in a transfer of control of domestic operations and customers, *see* 47 C.F.R. §§ 63.01, 63.03, and 63.04.

Unfortunately, the Applicants did not seek timely Commission approval of the Transaction. The oversight was inadvertent and unintentional. At the time of the Transaction, Applicants were advised by its telecom consultants to only send a notice to the Commission and in good faith sent a notice to the FCC as directed and Applicants were not aware of the obligation to request prior Commission approval. As soon as this failure came to the Applicants’ attention, the Applicants took steps to remedy the noncompliance and to seek authority, to the extent necessary, for the continued provision of service to customers. The Applicants regret this oversight and have taken steps to ensure compliance with all applicable Commission requirements going forward.

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

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

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, Esq.

Managing Attorney

Lance J.M. Steinhart, P.C.

*Attorneys for Combined Public Communications, LLC and  
Bealls Communication Group, LLC*