

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

<b>In the Matter of</b>	)	
	)	
<b>1 800 COLLECT, INC.</b>	)	
<b>(FRN: 0016339814)</b>	)	<b>WC Docket No. 16-_____</b>
	)	
<b>Section 214 Authorization Holder and Assignor,</b>	)	<b>File No. ITC-ASG-_____</b>
	)	
<b>and</b>	)	
	)	
<b>18C, LLC</b>	)	
	)	
<b>Proposed Assignee.</b>	)	
	)	
<b>Joint Application for Consent to Assignment</b>	)	
<b>Pursuant to Section 214 of the</b>	)	
<b>Communications Act of 1934, as Amended</b>	)	

**JOINT APPLICATION FOR CONSENT TO ASSIGNMENT OF SECTION 214  
AUTHORITY**

1 800 Collect, Inc. ("Assignor") and 18C, LLC ("Assignee") (Assignor and Assignee may be collectively referred to as the "Applicants"), by their undersigned counsel and pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, and Sections 63.01, 63.03, 63.04, and 63.24 of the Commission's Rules, hereby submit this Joint Application for Commission consent to the assignment of the Section 214 authorizations held by Assignor, from Assignor to Assignee (the "Application").

Pursuant to Section 63.04(b) of the Commission's Rules, the Applicants are filing a combined domestic and international application. As described below, Applicants respectfully request streamlined treatment of this Application pursuant to Section 63.03 of the Commission's Rules.

## **1. INTRODUCTION AND SUMMARY OF TRANSACTION**

Assignor currently provides wireline domestic and international interexchange services to customers on a nationwide basis. Its principal service involves collect calling, both on a domestic and international basis.

Assignee is a newly created entity. Its controlling entity, WiMacTel, Inc. (“WMT”) currently provides wireline domestic and international interexchange and operator and directory assistance services to customers on a nationwide basis.

The Applicants have entered into an agreement pursuant to which Assignee will acquire the Section 214 authorization and certain assets owned by Assignor, in exchange for specified consideration. This will enable Assignor’s owners to redeploy their financial and human capital to other investments. In turn, it will permit Assignee to provide to and service customers and accounts of Assignor, the collect calling service in much the same manner as previously provided by Assignor

Following the consummation of the proposed assignment, the Assignee intends to continue the collect calling services of Assignor (which has a name brand long synonymous with collect calling), under similar rates, terms, and conditions as were provided to customers of Assignor and with no expected material disruption or any adverse impacts on service quality or performance. The transaction will be virtually transparent to the customers of the branded “1 800 Collect” collect calling service.

The Assignor is unique in that it does not have an ongoing customer-subscriber base. Each call is a one-off call and, in many instances, the caller has not previously used the telecommunications service and probably will not do so in the future. Owing to the unique aspects of the collect calling service, where there are no subscribers and each call is treated as a

unique customer event, the Assignor does not maintain a caller database and does not possess the ability to notify its users, whether past, present, or future, of the proposed transaction.

Considering the absence of subscribers, the Applicants submit that the provisions of Section 64.1120(e) of the Commission's Rules is inapplicable or, in the alternative, that the notice requirements of Section 64.1120(e) should be waived because of the absence of traditional subscribers and the impossibility of the Applicants being able to identify and notify those parties who may use this collect calling service now or in the future.

**2. SECTION 63 INFORMATION**

Pursuant to Sections 63.04, 63.18 and 63.24 of the Commission's Rules, Applicants hereby provide the following information:

**A. Name, address and telephone number of each applicant:**

Applicants:

Assignor:

1 800 Collect, Inc.  
Suite B  
1658 Gailles Boulevard  
San Diego, California 92154

Assignee:

18C, LLC  
13515 I Circle  
Omaha, Nebraska 68137

**B. Government, state or territory under the laws of which each corporate or partnership applicant is organized:**

Assignor:

Assignor is a corporation organized under the laws of the state of Florida

Assignee:

Assignee is a limited liability company organized under the laws of the state of Delaware

**C. Name, title, post office address, and telephone number of the officer or contact point to whom correspondence concerning the application is to be addressed:**

Assignor

Contact Person:

Barry A. Friedman  
Thompson Hine LLP  
Suite 700  
1919 M Street, N.W.  
Washington, D.C. 20036  
(202) 331-8800

Assignee

Contact Person:

Leon Nowalsky, Esq.  
Nowalsky and Gothard, APLC  
1420 Veterans Blvd.  
Metairie, LA. 70005

**D. Name, address, citizenship and principal business of any person or entity that directly owns at least ten (10) percent of the equity of the applicant, and the percentage of equity owned by each of those entities:**

Assignor:

The entities that holds 10 percent or more of the shares of Assignor prior to consummation of the Transaction are as follows:

CMG 2011 Irrevocable Trust, established under the Declaration of Trust,  
dated March 28, 2011, David Abeles, Trustee  
Suite 300  
12526 High Bluff Drive  
San Diego, California 92130  
(619) 661-6661  
Ownership Interest 50.00%

RKG 2011 Irrevocable Trust, established under the Declaration of Trust,  
dated March 28, 2011, David Abeles, Trustee  
Suite 300  
12526 High Bluff Drive  
San Diego, California 92130  
(619) 661-6661  
Ownership: 50.00%

Assignee:

The membership interests of the Assignee, at consummation of the assignment, will be owned by the shareholders of Assignor. In addition, pursuant to the terms of the terms of the agreements between the parties and the initial Operating Agreement of the Assignee, the Assignee will be controlled by "WMT". This control will extend to WMT making all decisions as to financial, operational and personnel matters of the Assignee. The members of the Assignee will have no rights to make any decisions concerning the Assignee in the absence of a default under terms of certain agreements, effective as of closing, between the parties. Upon the reaching of certain agreed financial targets, WMT shall be entitled to be assigned and assume all of the membership interests of the Assignee.

WMT, the entity that will control the Assignee pending the reaching of the agreed upon financial targets, has the following address:

WiMacTel, Inc.  
13515 I Circle  
Omaha, Nebraska 68137

The following entity, a Canadian corporation, has a 10% or greater interest in WMT:

Quortech Equities Ltd.  
Unit N, 7003 – 5<sup>th</sup> Street SE  
Calgary, Alberta T2H 2G2  
1-800-820-4680  
Ownership: 100%

The persons and entities that have a 10% or greater interest in Quortech Equities Ltd. are:

IBT Consulting Inc. (Canadian corporation)  
Unit N, 7003 – 5<sup>th</sup> Street SE  
Calgary, Alberta T2H 2G2  
Ownership: 50%

Technology Concepts Inc. (Canadian corporation)  
101 West Terrace Rise  
Cochrane, Alberta T4C 1S3  
Ownership: 50%

**E. Certification pursuant to 47 C.F.R. Sections 1.2001 through 1.2003 that no party to the application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.**

Pursuant to the provisions of Sections 1.2001 through 1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001- 1.2003, the parties to this Application certify that none is subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

**F. Description of the Transaction:**

The transaction involves the sale of certain assets of Assignor to Assignee, with Assignee continuing the operate of Assignor's collect calling business as its successor.

**G. Description of the geographic areas in which the assignor and assignee (and their affiliates) offer domestic telecommunications services, and what services are provided in each area:**

The Assignor has operated on a nationwide basis and provided both domestic and international collecting calling services. The Assignee may elect to restrict the number of states in which it will offer such services.

**H. Statement as to how the application fits into one or more of the presumptive streamlined categories in section 63.03 or why it is otherwise appropriate for streamlined treatment:**

The Transaction is eligible for presumptive streamlined processing under Section 63.03(b)(2)(i) of the Commission's Rules, 47 C.F.R. § 63.03(b)(2)(i), as neither Assignor nor Assignee is dominant with respect to any service. As a result of the Transaction, the Assignee will not have a market share in the interstate, interexchange market of more than 10 percent and the Assignee will provide competitive telephone exchange services in geographic areas served by a dominant local exchange carrier that is not a party to this Transaction.

**I. Identification of all other Commission applications related to the same transaction:**

Not applicable.

**J. Domestic and International Authorizations**

Assignor will provide international telecommunications under Section 214 authorization for global resale that is being transferred to Assignee from Assignor as part of the transaction. Assignor holds blanket domestic Section 214 authority to provide domestic telecommunications service.

WMT provides international telecommunications under Section 214 authorization for global resale in File No. ITC-214-20100927-00443. Assignor holds blanket domestic Section 214 authority to provide domestic telecommunications service.

As evidenced by the signatures to this Application, Applicants certify that none of the Applicants is a foreign carrier and no Applicant is affiliated with a foreign carrier. WMT's parent, which proposes to control the Assignee is a Canadian-based telecommunications carrier that operates in both the United States and Canada. WMT offers certified long distance service, is a VoIP and wireless reseller and payphone service provider, in the USA and Canada. The provision of collect calling service is intended to expand on the payphone services already offered by WMT.

Assignee submits that it satisfies the requirements of Section 63.10(a)(1) to be presumptively classified as "non-dominant" for the provision of international telecommunications services.

Except for WMT, which is a Canadian telecommunications carrier, Applicants certify that no Applicant is affiliated, pursuant to 47 C.F.R. § 63.18(j)(1)-(4), with a foreign carrier providing service in a destination country to which Assignee intends to provide international telecommunications services, that Assignee does not control a foreign carrier in any destination country, that no entity that controls a foreign carrier in any destination country owns more than 25% of Assignee, and that two or more foreign carriers (or parties that control foreign carriers) do not own, in the aggregate, more than 25% of the Assignee and are not parties to, or the beneficiaries of, a contractual relationship (e.g., a joint venture or market alliance) affecting the provision or marketing of international basic communications services in the United States.

Except for Canada, no showing is required of Assignee in response to Section 63.18(j). Assignee wishes to inform the Commission that a review of the Assignor's 2015 performance evidences that the Assignor currently provides both domestic and international service in Canada, though it represents a small amount of Assignor's collect calling services.

In response to Section 63.18(l), Assignee does not propose to resell the international switched services of an unaffiliated U.S. carrier for the purpose of providing international telecommunications services to a country where it is a foreign carrier or is affiliated with a foreign carrier.

As evidenced by the signatures to this Application, Applicants certify that they have not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route and will not enter into such agreements in the future.

**K. Statement of whether the applicants are requesting special consideration because either party to the transaction is facing imminent business failure:**

No party to the Application is requesting special consideration because of imminent business failure.

**L. Identification of any separately filed waiver requests being sought in conjunction with the transaction:**

There are no separately filed waiver requests being sought in conjunction with the Transaction.

**M 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.**

The transaction will serve the public interest by ensuring no interruption of service, no inconvenience to customers, and no diminution in the availability of collect calling services. While collect calling services are not used to the extent they once were, they remain a valuable service in times of emergencies and for many low income and minority group individuals. The

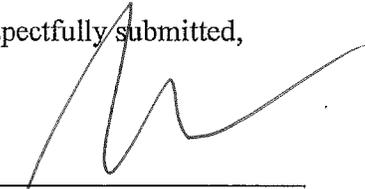
loss of such service would be detrimental to individuals who have limited alternative telecommunications services.

Assignee is an experienced provider of telecommunications services and possesses the technical, financial and managerial capabilities to continue in the Assignor's business in operation and the assignment of the Assignor to Assignee is, as a result, in the public interest. Accordingly, Applicants respectfully request that the Commission grant the Application as soon as practicable.

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Based on the foregoing, the Applicants respectfully request that the Commission grant this Joint Application and consent to the assignment of the Assignor's Section 214 authority to the Assignee.

Respectfully submitted,



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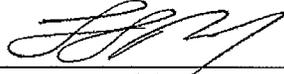
Barry A. Friedman  
Thompson Hine LLP  
1919 M Street, NW  
Washington, DC 20036  
(202) 331-8800 (Tel)  
(202) 331-8330 (Fax)

*Counsel to 1 800 Collect, Inc.*

Dated:

8/31/16

Respectfully submitted



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Leon Nowalsky  
Nowalsky & Got hard, A PLLC  
1420 Veterans Blvd.  
Metairie, LA 70005  
(504) 832-1984 (Tel)  
(504) 831-0892 (Fax)

*Counsel to 18C, LLC and  
WiMacTel, Inc.*

Dated: 8/31/16

## **ATTACHMENTS LIST**

Certification of Assignor

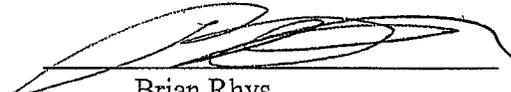
Certification of Assignee

DECLARATION

I, Brian Rhys, declare, under penalty of perjury:

1. I am the Treasurer of 1 800 Collect, Inc., a Florida corporation.
2. I have read the foregoing Joint Application for Consent to Assignment of Section 214 Authority, requesting that the Federal Communications Commission consent to the assignment of the domestic and international Section 214 authority, from 1 800 Collect, Inc. to 18C, LLC, a Delaware limited liability company.
3. The facts stated in the Joint Application, in respect to 1 800 Collect, Inc., are true and correct, to the best of my information, knowledge and belief.

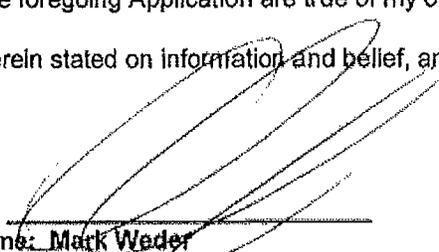
Executed at San Diego, California, on the 31<sup>st</sup> day of August, 2016.

  
Brian Rhys

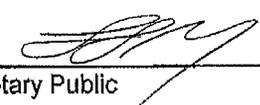
STATE OF LOUISIANA  
COUNTY OF JEFFERSON

VERIFICATION

I, Mark Weder, am the Chief Financial Officer of WiMacTel, Inc., and am authorized to make this verification on its behalf. The statements made in the foregoing Application are true of my own knowledge, except as to those matters which are therein stated on information and belief, and as to those matters I believe them to be true.

By:   
Name: Mark Weder  
Title: Chief Financial Officer

Sworn to and subscribed before me, Notary Public, in and for the State and County named above, this 30 day of August, 2016.

  
\_\_\_\_\_  
Notary Public

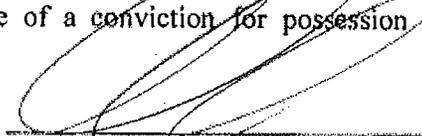
My commission expires: AT DEATH

State of LOUISIANA

County of JEFFERSON

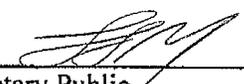
**AFFIDAVIT**

The applicant below certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance.

By: 

Printed Name: Mark Weder  
Title: Chief Financial Officer  
Company: WiMacTel, Inc.

Sworn to and subscribed before me this  
30 day of NOV, 2016

  
\_\_\_\_\_  
Notary Public

My commission expires AT DEATH