

September 12, 2018

VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Room TW-B204
Washington, DC 20554

Re: *Supplemental Filing - WC Docket No. 18-268*

Dear Ms. Dortch:

This letter supplements the above-referenced application (“Application”) for Commission consent to transfer indirect control of Smart City Telecommunications LLC (“SCT”); Smart City Solutions, LLC; Smart City Networks, Limited Partnership; Smart City of Washington D.C., LLC; and Convention Communications Provisioners, Inc. from Smart City Holdings, LLC (“Transferor”) to Sapphire Intermediate Holdings, LLC (“Transferee” and jointly with Transferor, the “Applicants”) (“Transaction”) in response to follow up questions from Commission staff.

1. Provided below is additional information about two (2) entities listed in the post-closing ownership chart filed as part of the Application:
 - AppBurst, LLC (“AppBurst”) is a wholly-owned direct subsidiary of Transferor specializing in developing mobile applications for the event and conference industry. AppBurst does not directly or indirectly hold any FCC authorizations. At closing, AppBurst will become a wholly-owned direct subsidiary of Sapphire Convention, Inc. and a wholly-owned indirect subsidiary of Transferee.
 - Dynamic Concepts, Inc. (“DCI”) is a District of Columbia corporation that provides project management, technology network infrastructure and utility construction services in the District of Columbia. DCI does not directly or indirectly hold any FCC authorizations.
2. SCT currently receives high cost universal service support though A-CAM in study area 210330.
3. Alteva of Warwick, LLC (“Alteva of Warwick”) currently receives (i) high cost universal service support on a cost basis in study area 160138 and (ii) high cost universal service support though A-CAM in study area 150135. While Court Square Capital Partners III, L.P. and Court Square Capital GP III, LLC will hold indirect equity and voting rights in both Alteva of Warwick and SCT, the businesses will continue to be operated separately and there is no market or service overlap between SCT and Alteva of Warwick.

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If you have any questions about this supplement, please contact the undersigned.

Respectfully submitted,

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/s/ Paige K. Fronabarger
Paige K. Fronabarger
WILKINSON BARKER KNAUER, LLP
1800 M Street, N.W., Suite 800N
Washington, DC 20036
Tel: (202) 783-4141
Fax: (202) 783-5851
Email: pfronabarger@wbklaw.com

Counsel for Sapphire Intermediate Holdings,
LLC

cc: Russell Blau
Danielle Burt
Martin A. Rubin
Christopher D. Bloise