



1300 NORTH 17th STREET, 11th FLOOR
ARLINGTON, VIRGINIA 22209

OFFICE: (703) 812-0400
FAX: (703) 812-0486
www.fhhlaw.com
www.commlawblog.com

September 25, 2018

CHENG-YI LIU
(703) 812-0478
LIU@FHHLAW.COM

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Request for domestic STA; The Estate of Martin J. Tibbitts

Dear Ms. Dortch:

The Estate of Martin J. Tibbitts (“Estate” or “Applicant”), through counsel and pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, hereby requests Special Temporary Authority (“STA”) for a period of sixty (60) days with respect to the eight companies listed below (“Companies”).¹

1. Business Network Long Distance, Inc. (WC Docket No. 18-107)
2. Network Service Billing, Inc. (WC Docket No. 18-108)
3. Nationwide Long Distance Service, Inc. (WC Docket No. 18-109)
4. Integrated Services, Inc. (WC Docket No. 18-110)
5. Communications Network Billing, Inc. (WC Docket No. 18-111)
6. Multiline Long Distance, Inc. (WC Docket No. 18-112)
7. National Access Long Distance, Inc. (no docket; application to be filed)
8. LCR Telecommunications, LLC (no docket; application to be filed)

Martin J. Tibbitts, the sole owner of the Companies, unexpectedly passed away on July 20, 2018. This STA request is made so that the Estate may operate the Companies pending Commission approval of the necessary domestic 214 transfer of control applications.

Mr. Tibbitts executed seven Stock Purchase Agreements (the “Agreements”) on January 1, 2017 to acquire a 100% interest in each of the Companies (except for LCR Telecommunications, LLC, in which he already held 100% interest). Corporate counsel for the Companies, who did not have a background in telecommunications regulation, approached these transactions from a tax standpoint and prepared the Agreements to consummate concurrent with their execution on January 1, 2017. The Companies also retained the services of a compliance vendor to handle regulatory compliance associated with the underlying transactions, but the

¹ Multiline Long Distance, Inc. is an Ohio corporation. LCR Telecommunications, LLC is a Michigan limited liability company. The other Companies are organized under the laws of Nevada.

Consultants may have been equally unfamiliar with the regulatory processes and timing involved in transferring control of the Companies.

As a result, the Companies did not obtain prior Commission approval for domestic 214 transfer of control for the transactions before Mr. Tibbitts acquired his interests in the Companies (except for LCR Telecommunications, LLC, which he already owned) on January 1, 2017. Most of the Companies ultimately filed domestic 214 transfer of control applications,² but Mr. Tibbitts passed away before the Commission approved the applications, and they remain pending.³ Moreover, Applicant has yet to seek the Commission's consent for the involuntary transfer of control of all the Companies from Martin Tibbitts to the Estate. Applicant is requesting this STA as part of a plan to correct any deficiency which may have resulted from these oversights.

The underlying transactions did not result in a reduction or impairment of service to any of the Companies' customers. The Companies are all non-dominant, non-facilities-based interexchange carriers that provide domestic (pursuant to blanket authority under Section 63.01 of the Commission's rules) and international long distance telecommunications service on a purely resold basis.⁴ Grant of this STA is in the public interest as it will allow Applicant to continue providing uninterrupted telecommunications services to the Companies' customers. Absent a grant of STA, discontinuance of the Companies' service could result in a widespread loss of telecommunications services to end user customers.

Applicant acknowledges that the grant of this STA will not prejudice any action the Commission may take on the underlying transfer of control applications. Applicant further acknowledges that STA can be revoked by the Commission upon its own motion without a hearing, and that grant of an STA and the underlying application will not preclude enforcement action.

Please contact the undersigned should you have any questions.

Sincerely,

/s/ Cheng-yi Liu

/s/ Mark DeSantis

Counsel for the Estate of Martin J Tibbitts

cc: Jodie May (Jodie.May@fcc.gov)
Alex Johns (Alexis.Johns@fcc.gov)
Tracey Wilson (Tracey.Wilson@fcc.gov)

² National Access Long Distance, Inc. has yet to file a domestic 214 transfer of control application for approval to transfer ownership to Martin Tibbitts. LCR Telecommunications, LLC, was already owned by Martin Tibbitts, but no applications have been filed for the transfer of control to the Estate. Applicant is working with counsel to coordinate with Commission staff and file all necessary applications as soon as possible.

³ See WC Docket Nos. 18-107, 18-108, 18-109, 18-110, 18-111, and 18-112.

⁴ Separate applications and STA requests are being filed with respect to international 214 authority.