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September 30, 2019

**VIA ECFS**

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

**Attn: Wireline Competition Bureau**

Re: Infinity Networks, Inc. and Combined Public Communications, LLC  
Request for Extension of Special Temporary Authorization  
WC-19-221

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, Infinity Networks, Inc. ("Infinity") along with Combined Public Communications, LLC ("Combined Public") (collectively, the "Applicants"), hereby respectfully request an extension of the Special Temporary Authority ("STA Extension") originally granted August 12, 2019, so that Combined Public may continue to service the acquired customers pending Commission approval of their First Amended Section 214 Application, filed on August 1, 2019, for assignment of domestic authorization and for transfer of certain customers of Infinity to Combined Public (the "Application").

*Request for Domestic STA Extension; Good Cause*

The Applicants respectfully request an extension for the Domestic STA granted on August 12, 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 August 1, 2019, and is currently pending before the Commission

Effective February 26, 2018, three inmate communications services agreements for facilities in the State of Alabama were assigned by Infinity to Combined Public (the “Transaction”) pursuant to a Bill of Sale, Assignment and Assumption Agreement by and between Infinity and Combined Public (the “Agreement”). The Transaction resulted in a transfer of certain 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. Unfortunately, the Applicants did not seek timely Commission approval of the Transaction. The oversight was inadvertent and unintentional. As soon as this failure came to the Applicants’ attention, the Applicants took steps to remedy the noncompliance. 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 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 Application is pending. The Applicants acknowledge that the grant of this STA Extension will not prejudice any action the Commission may take on the 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

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