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November 1, 2019

Marlene Dortch
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Supplement to Application of James A. Smith and Timothy J. Smith, Transferors
and Oregon Telephone Corporation, Transferee For Consent for Transfer of
Control WC Docket No. 19-307

Dear Ms. Dortch:

As a supplement to the Application submitted on October 23, 2019, in the above referenced docket, the following information is submitted. The application states at page 4 that "North-State Telephone Co., an Oregon corporation, owns fourteen (14%) of the stock of OTC, which leads to amounts held indirectly by Mr. Bott which are included in the figures set out for Mr. Bott." The application goes on to say the Mr. Bott is the primary shareholder in North-State Telephone Co. However, there has been a reorganization since that statement was true. Under the reorganization, North-State Telephone Co. has become a subsidiary of Oregon Telephone Corporation (OTC) with OTC owning ninety-five percent of the shares and Mr. Bott owning five percent of the shares. Mr. Bott owns all of the shares of OTC.

North-State Telephone Co. (North-State) is a rural incumbent local exchange carrier (ILEC) with study area code 532388. North-State is incorporated in the state of Oregon. North-State operates the exchange of Dufur in the state of Oregon.

OTC (SAC 532389 and 533336) operates the rural exchanges of Mt. Vernon, Bates, Prairie City, Dayville, Hereford-Unity, Harper and Juntera all in the state of Oregon. OTC is a rural ILEC which is incorporated in the state of Oregon.

Helix Telephone Company (Helix) operates the exchanges of Helix and Meacham in the state of Oregon. Helix is a rural ILEC that is incorporated in the state of Oregon.

None of the exchanges of OTC, North-State or Helix overlap one another nor are they adjacent to one another. That is, the exchanges of Helix and Meacham operated by Helix are not adjacent to nor do they overlap the Dufur exchange operated by North-State. Nor are the

exchanges of Helix and Meacham adjacent to or overlap any of the exchanges of OTC.

A organizational chart is attached. As noted on the organizational chart, North-State owns all of the stock of Home Telephone Company (SAC 532337), Pine Telephone System, Inc. (SAC 532392) and Skyline Telecom, Inc. (SAC 520581 and 521402). Home and Pine are each rural ILECs in the state of Oregon. Home services the Condon exchange in Oregon and is incorporated in the state of Oregon. Pine operates the Halfway, Granite and Three Rivers exchanges in Oregon. Pine is incorporated in the state of Oregon.

Skyline is a rural ILEC in the state of Washington. Skyline serves the Mt. Hull and Beaver Creek exchanges in Washington. Skyline is incorporated in the state of Washington.

Again, none of these companies (Home, Pine and Skyline) are adjacent to one another or overlap one another, nor are they adjacent to or overlap either Helix exchange. To try to be as specific as possible, there are no overlapping or adjacent service areas between Helix and OTC nor between any of OTC's affiliates and Helix.

Further, as can be seen from the organizational chart OTC owns one hundred percent of the stock of New Florence Telephone Company (SAC 421927) in Missouri. New Florence in turn owns one hundred percent of the stock of each of New London Telephone Company (SAC 421928), The Stoutland Telephone Company (SAC 421951) and Orchard Farm Telephone Co. (SAC 421934). All of these are rural ILECs operating in the state of Missouri. Each of these companies is incorporated in the state of Missouri.

New Florence serves the exchange of New Florence. New London serves the exchange of New London. Stoutland serves the exchange of Stoutland. Orchard Farm serves the exchange of Orchard Farm.

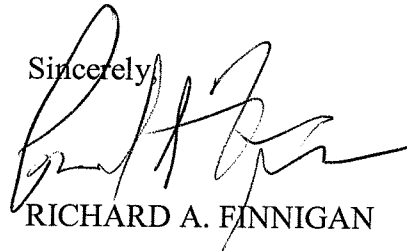
OTC also owns one hundred percent of MD Communications. MD Communications offers Internet access service and long distance service in the state of Oregon. It does offer interexchange service in the OTC exchanges, as well as North-State, Home and Pine exchanges.

Finally, it is noted at page 5 of the Application that Mr. Bott owns seven and one-half percent of Direct Communications Long Distance, Inc. To be clear, Direct communications Long Distance, Inc. is a interexchange company, but it does not offer service in either Oregon or Missouri.

Marlene Dortch
November 1, 2019
Page 3 of 3

To respond to another question from FCC Staff, all of the Oregon affiliates are A-CAM.
All of the Missouri companies are also A-CAM.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard A. Finnigan", written over the word "Sincerely,".

RICHARD A. FINNIGAN

RAF/cs
Enclosure

cc: Client (via e-mail)
Gregory Kwan (via e-mail)