In the Matter of

Crown Point Network Technologies, Inc.  
Transferor

and

SLIC Network Solutions, Inc.  
Transferee

For Grant of Authority Pursuant to Section 214 of the Communications Act of 1934, as Amended, and Section 63.04 of the Commission’s Rules to Transfer Certain Assets of Domestic Section 214 Carriers

JOINT APPLICATION


In support of this filing, Applicants provide the following information:

I. Request for Streamlined Treatment

This Joint Application qualifies for streamlined processing pursuant to Section 63.03(b)(2)(i) of the Commission’s Rules because “[n]either of the applicants is dominant with respect to any service.”
The Commission’s definition of “dominant,” as set forth in Section 61.3(q) of the Commission’s Rules, is “to have market power (i.e., power to control prices).” SLIC is organized as a small Competitive Local Exchange Carrier (“CLEC”) with approximately 6,000 customers and, as such, is a non-dominant carrier. Crown Point is organized as a small CLEC with approximately 1150 customers and, as such, is also a non-dominant carrier.

Neither SLIC nor Crown Point, singly or combined, have a market share of 10 percent or more. Both entities cannot control the price of their competitors service offerings, face substantial competition from other cable and wireless providers, cannot constrain competitors from seeking to induce their respective customers to switch to competitors, and do not generate profit levels that demonstrate any dominant market power. Therefore, neither Applicant should be considered “dominant” for purposes of determining whether this Joint Application qualifies for streamlined treatment pursuant to the Commission’s Rules.

II. Description of Applicants, Transaction, and Public Interest Statement

Crown Point provides telecommunications services, including landline and internet service, to both residential and business subscribers in the Crown Point, New York area. SLIC and its affiliates currently offer phone, internet, and television service in various areas throughout St. Lawrence, Franklin, Hamilton, Warren, Essex, and Clinton counties in northern NY. SLIC is acquiring approximately 1150 customers from Crown Point.

The standard applied by the Commission, in making its public interest evaluation, consists of the following: (1) whether the proposed transaction complies with the specific provisions of the Act, other applicable statutes, and the Commission’s rules; (2) whether the transaction would result
in public interest harms by substantially frustrating or impairing the objectives or implementation of the Act or related statutes; and (3) whether the transaction will yield public interest benefits.\textsuperscript{1}

The proposed transaction fully meets the Commission’s public interest standard. The proposed transaction does not violate the Act, any other applicable statute, or the Commission’s rules. Further, the proposed transaction will not result in any public interest harms.

In addition, the transfer of the existing customers of Crown Point to SLIC will have no negative impact on the subscribers of Crown Point. No change to any tariff or customer contracts, or to the types and quality of services currently provided by Crown Point is planned or contemplated. The transaction will be seamless to the Crown Point customers as there will be no loss or reduction in service. The customers will be given advanced notice of the consummation of the proposed transaction. Specifically, Crown Point will advise its customers, in writing, to the customers’ address of record, of the sale to SLIC and its customers will be informed that they may continue service on the same terms and conditions, though the customers of Crown Point are not obligated to do so.

Upon consummation of the transaction, Crown Point will assist SLIC in the orderly transition of the customers from Crown Point to SLIC. In addition, several employees of a Crown Point affiliate are expected to become employees of SLIC to support the delivery of Crown Point services and the ongoing success of the transaction more fully.

III. **Information Required by Section 63.04**

Pursuant to Section 63.04 of the Commission’s Rules, the Applicants submit the following information:

\textsuperscript{1} See, e.g., *Joint Application of General Communication, Inc. and GCI Liberty, Inc. for Consent to Transfer Control*, WC Docket No. 17-114, Memorandum Opinion and Order, 32 FCC Rcd 9349, 9352-54 (paras. 7-9) (WTB, IB, MB & WTB 2017).
Name, Address and Telephone Number of Each Applicant.

The following table provides contact information for the Assignor and the Assignee:

<table>
<thead>
<tr>
<th>For Crown Point</th>
<th>FRN</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name: Shana R. Macey</td>
<td>0008206997</td>
</tr>
<tr>
<td>Title: President</td>
<td></td>
</tr>
<tr>
<td>Crown Point Network Technologies, Inc.</td>
<td></td>
</tr>
<tr>
<td>P.O. Box 430</td>
<td></td>
</tr>
<tr>
<td>Crown Point, NY 12928</td>
<td></td>
</tr>
<tr>
<td>Email: <a href="mailto:Shana.Macey@cptelco.com">Shana.Macey@cptelco.com</a></td>
<td></td>
</tr>
<tr>
<td>Tel.: (518) 597-3300</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>For SLIC</th>
<th>FRN</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name: Bradley G. Pattelli</td>
<td>0011412129</td>
</tr>
<tr>
<td>Title: Chief Executive Officer</td>
<td></td>
</tr>
<tr>
<td>SLIC Network Solutions, Inc.</td>
<td></td>
</tr>
<tr>
<td>3330 State Highway 11-B</td>
<td></td>
</tr>
<tr>
<td>Nicholville, NY 12965</td>
<td></td>
</tr>
<tr>
<td>Email: <a href="mailto:bpattelli@slicfiber.com">bpattelli@slicfiber.com</a></td>
<td></td>
</tr>
<tr>
<td>Tel.: (315) 274-9050</td>
<td></td>
</tr>
</tbody>
</table>

Jurisdiction of Organizations—§ 63.04(a)(2).

Crown Point is a corporation organized under the laws of the State of New York. SLIC is a corporation also organized under the laws of the State of New York.

Correspondence concerning this Joint Application—§ 63.04(a)(3).

Copies of Correspondence to:

Todd B. Lantor  
Todd Slamowitz  
Lukas, LaFuria, Gutierrez & Sachs, LLP  
8300 Greensboro Drive, Suite 1200  
Tysons, Virginia 22102  
E-mail: tlantor@fcclaw.com  
E-mail: tslamowitz@fcclaw.com  
Tel.: (703) 584-8678

Ownership of SLIC—§ 63.04(a)(4).

The following entities hold a direct or indirect 10 percent or greater ownership interest in SLIC:
The following entity is the only entity that holds a direct 10 percent or greater membership interest in SLIC.

<table>
<thead>
<tr>
<th>Entity</th>
<th>Citizenship</th>
<th>Address</th>
<th>Principal Business</th>
<th>Ownership</th>
</tr>
</thead>
<tbody>
<tr>
<td>Atlas Connectivity, LLC</td>
<td>Delaware limited liability company</td>
<td>3330 State Highway 11-B Nicholville, NY 12965</td>
<td>Telecommunications</td>
<td>100%</td>
</tr>
</tbody>
</table>

The following entities are the only entities that hold a direct 10 percent or greater membership interest in Atlas:

<table>
<thead>
<tr>
<th>Entity</th>
<th>Citizenship</th>
<th>Address</th>
<th>Principal Business</th>
<th>Ownership</th>
</tr>
</thead>
<tbody>
<tr>
<td>5LOOP, LLC</td>
<td>Delaware limited liability company</td>
<td>1415 W. 22nd St. Suite 1250 Oak Brook, IL 60523</td>
<td>Private Equity Investor</td>
<td>80.13%</td>
</tr>
</tbody>
</table>

No Individual member of Atlas management, no individual Atlas employee, and no individual Nicholville shareholder holds a 10 percent or greater voting interest in Atlas. This includes Bradley Pattelli and his family because, although they own an indirect 17.63 percent equity interest in Atlas (as stated below), their Membership Units in Atlas are held by and owned through 5LOOP, LLC, and are voted by 5LOOP, LLC, the Managing Member of which is Rock Island Capital Fund II, L.P.

The following entities are the only entities that hold a direct 10 percent or greater membership interest in 5LOOP, LLC:

<table>
<thead>
<tr>
<th>Entity</th>
<th>Citizenship</th>
<th>Address</th>
<th>Principal Business</th>
<th>Ownership</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rock Island Capital Fund II, L.P.</td>
<td>Delaware partnership</td>
<td>1415 W. 22nd St. Suite 1250 Oak Brook, IL 60523</td>
<td>Private Equity Investor</td>
<td>78.96%</td>
</tr>
<tr>
<td>Bradley Pattelli and his family</td>
<td>U.S. citizens</td>
<td>276 Mansfield Ave. Darien, CT 06820</td>
<td>Individual Investor</td>
<td>17.63%</td>
</tr>
</tbody>
</table>
The following entity is the only entity that holds a direct 10 percent or greater equity interest in Rock Island Capital Fund II, L.P. with respect to SLIC:

<table>
<thead>
<tr>
<th>Entity</th>
<th>Citizenship</th>
<th>Address</th>
<th>Principal Business</th>
<th>Ownership</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lanigan Holdings, LLC</td>
<td>Illinois Limited Liability Company</td>
<td>3111 West 167th Street Hazel Crest, IL 60429</td>
<td>Family Office Investor</td>
<td>12.6%</td>
</tr>
</tbody>
</table>

No other individual or entity has a 10 percent or greater direct or indirect interest in SLIC. Further, no foreign individual, government, corporation, or other entity has a 10 percent or greater direct or indirect interest in SLIC. Finally, SLIC does not hold a 10 percent or greater equity or voting interest in any FCC-regulated entity. Other than its 100 percent ownership interest in SLIC and Nicholville Telco LLC (“Nicholville Telco”), Atlas does not have an equity or voting interest of 10 percent or greater in any FCC-regulated entity. Other than their ownership interests in Atlas (which has a 100 percent ownership interest in SLIC and Nicholville Telco), neither 5LOOP, LLC, Rock Island Capital Fund II, L.P., Lanigan Holdings, LLC, nor Bradley Pattelli and his family has an equity or voting interest of 10 percent or greater in any FCC-regulated entity, nor do any of these entities or persons have an equity or voting interest of 10 percent or greater in any FCC-regulated entity that overlaps with SLIC.

See Exhibit A showing the 10 percent or greater direct or indirect voting or equity holders of SLIC.

- **Anti-Drug Abuse Act Certification**—§ 63.04(a)(5).

  Applicants certify that they are not subject to denial of federal benefits pursuant to Section 53.01 of the Anti-Drug Abuse Act of 1988. See 21 U.S.C. § 853(a); see also 47 C.F.R. § 1.2001-1.2003.

- **Description of Transaction**—§ 63.04(a)(6).
A description of the proposed transaction is set forth in Section II, *supra*.

- **Description of Geographic Area in Which the Transferor and Transferee (and Their Affiliates) Offer Domestic Telecommunications Services, and What Services Are Provided in Each Area**—§ 63.04(a)(7).

  Both Crown Point and SLIC currently provide facilities-based local exchange and competitive access telecommunications services in the state of New York.

- **Statement of Qualification for Streamlined Treatment**—§ 63.04(a)(8).

  A statement of qualification for streamlined treatment is set forth in Section I, *supra*.

- **Identification of All Other Commission Applications Related to This Transaction**—§ 63.04(a)(9).

  As part of the proposed transaction, Crown Point and SLIC are requesting assignment of two (2) International Section 214 Resale Authorizations held by Crown Point to SLIC. Further, in connection with this transfer of customers, the two companies will comply with the streamlined procedures set forth in Section 64.1120(e) of the Commission’s Rules, including the filing of a letter notification with the Commission and the provision of advance written notice to affected customers.

- **Statement of Whether the Applicants Request Special Consideration Because Either Party Is Facing Imminent Business Failure**—§ 63.04(a)(10).

  Neither Applicant is facing imminent business failure.

- **Identification of Any Separately Filed Waiver Requests Being Sought in Conjunction with this Joint Application**—§ 63.04(a)(11).

  There are no separately filed waiver requests being sought by the Applicants in connection with the proposed transaction.

- **Statement Showing How Grant of this Joint Application Will Serve the Public Interest, Convenience, and Necessity**—§ 63.04(a)(12).

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2 47 C.F.R. § 64.1120(e).
A demonstration of how the proposed transaction will serve the public interest is set forth in Section II, supra.

VI. RELIEF REQUESTED.

For the foregoing reasons, the Applicants respectfully submit that the public interest, convenience, and necessity will be furthered by a grant of this Joint Application. The Applicants respectfully request streamlined and expedited treatment to permit the Applicants to consummate the proposed transaction as soon as possible.

Respectfully submitted,

Todd B. Lantor

_____________________________

Todd B. Lantor
Todd Slamowitz
LUKAS, LAFURIA, GUTIERREZ & SACHS, LLP
8300 Greensboro Drive, Suite 1200
Tysons, Virginia 22102
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E-mail: tlantor@fcclaw.com
E-mail: tslamowitz@fcclaw.com

Counsel to the Applicants

December 8, 2020
EXHIBIT A
SLIC Network Solutions, Inc. 10% Owners

Lanigan Holdings, LLC
- 12.6% ownership

Other Investors
- 87.4% ownership

Rock Island Capital Fund II, L.P.
- 78.96% ownership

Co-Investors of Rock Island Capital Fund II, L.P.
- 3.41% ownership

Bradley Pattelli and Family
- 17.63% ownership

24 INVESTORS Management, Former Employees/Consultants; Largest Investor = 4.16%

5LOOP, LLC
- 80.13% ownership

Atlas Connectivity, LLC
- 100% owned by Atlas

SLIC Network Solutions, Inc.
ASSIGNEE