

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Connect America Fund	)	
	)	WC Docket No. 10-90
Broadband Rural Experiments	)	
	)	
Worldcall Interconnect, Inc. Petition for Waiver	)	

**PETITION FOR WAIVER**

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December 16, 2014

**PETITION FOR WAIVER**

Worldcall Interconnect, Inc. (“WCX”), by and through its undersigned Attorneys, and pursuant to Sections 1.3 of the Commission’s rules, hereby submits this Petition for Waiver.

WCX requests a waiver of the requirement that provisionally selected bidders for broadband experiments provide three years worth of audited financial statements in association with the materials to be submitted by WCX on December 19, 2014.

Pursuant to Sections 1.3 of the FCC’s rules, a waiver may be granted for “good cause.” Good cause exists. WCX has no audited statements at present because it is a small business, is not publicly traded and has operated its LTE network for less than three years. If the waiver is granted WCX will (as was already planned to occur) obtain audited statements on or about March 1, 2015. WCX will expeditiously provide them to the Commission when they are received from the auditor.

WCX is a wireless service provider offering advanced mobile telecommunications solutions to residents in thirteen counties in central Texas. The Texas licensed areas in issue are predominately sparsely populated, with many areas far removed from any towns or other population centers of any significance. WCX is a small business and is not publicly traded. WCX has operated its network for less than three years. While WCX has financial information, it has no business requirement for audited statements. WCX has nonetheless been planning to obtain audited statements for the years it has existed in order to meet anticipated Commission requirements associated with this proceeding, but it was going to include the most recent and relevant tax accounting year 2014. That accounting year closes on December 31, 2014.

If the audited statement requirement for the December 19, 2014 is waived WCX will obtain audited statements for each year between 2012 and 2014 and provide them to the

Commission when completed. WCX's December 19, 2014 5620 submission will be comprised of its "unaudited" financials for fiscal years 2011-2013 and unaudited year-to-date financials through the third quarter of 2014. WCX will also show a continued financial commitment by the stakeholders of WCX.

WCX understands that the purpose of the review following the December 19, 2014 submission is to ensure that WCX has the financial wherewithal to construct a network and to provide service. WCX's founders have a combined 30 years of managerial experience in funding and building communications companies. WCX has already constructed a network and currently provides service to areas neighboring the census block locations subject to the provisional award. WCX has already secured the network equipment (ENodeBs, Remote Radio Units, *etc*) that would support the 34 census blocks affected by the broadband experiment. This equipment is in current inventory.

The information to be supplied will adequately demonstrate financial wherewithal. WCX will have audited statements by March of 2015, and they will be supplied to the Commission. WCX believes good cause exists for a waiver of the audited financial statements requirement for the December 19, 2014 application filing, and we request that it be granted.

Respectfully submitted,

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