

READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE
FORM 159

Approved by OMB
1040-0000

WC 07-286

12-6-07 8145850

001

(1) LOCKBOX # 358145		FCC/MELLON		DEC 04 2007	
SECTION A - PAYER INFORMATION					
(2) PAYER NAME (if paying by credit card enter name exactly as it appears on the card) Susan W Lamb			(3) TOTAL AMOUNT PAID (U.S. Dollars and cents) \$965.00		
(4) STREET ADDRESS LINE NO. 1 111 TEAL LN					
(5) STREET ADDRESS LINE NO. 2					
(6) CITY SAGLE			(7) STATE ID	(8) ZIP CODE 83860 9396	
(9) DAYTIME TELEPHONE NUMBER (include area code) (208) 263-5922			(10) COUNTRY CODE (if not in U.S.A.)		
FCC REGISTRATION NUMBER (FRN) REQUIRED					
(11) PAYER (FRN) 0007888621					
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C) COMPLETE SECTION BELOW FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET					
(13) APPLICANT NAME ONEEIGHTY NETWORKS INC					
(14) STREET ADDRESS LINE NO. 1 118 N STEVENS ST					
(15) STREET ADDRESS LINE NO. 2					
(16) CITY SPOKANE			(17) STATE WA	(18) ZIP CODE 99201	
(19) DAYTIME TELEPHONE NUMBER (include area code) (509) 688-8001			(20) COUNTRY CODE (if not in U.S.A.)		
FCC REGISTRATION NUMBER (FRN) REQUIRED					
(21) APPLICANT (FRN) 0006927388					
COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET					
(23A) CALL SIGN/OTHER ID	(24A) PAYMENT TYPE CODE CUT		(25A) QUANTITY 1		
(26A) FEE DUE FOR (PTC) \$965.00	(27A) TOTAL FEE \$965.00				
(28A) FCC CODE 1		(29A) FCC CODE 2			
(23B) CALL SIGN/OTHER ID	(24B) PAYMENT TYPE CODE		(25B) QUANTITY		
(26B) FEE DUE FOR (PTC)	(27B) TOTAL FEE				
(28B) FCC CODE 1		(29B) FCC CODE 2			
SECTION D - CERTIFICATION					
CERTIFICATION STATEMENT I, <u>Susan Lamb</u> certify under penalty of perjury that the foregoing and supporting information is true and correct to the best of my knowledge, information and belief.					
SIGNATURE <u>Susan Lamb</u>			DATE <u>November 30, 2007</u>		

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE (CONTINUATION SHEET)
FORM 159-C

Page No 2 of 2

SPECIAL USE
FCC USE ONLY

USE THIS SECTION ONLY FOR EACH ADDITIONAL APPLICANT
SECTION BB - ADDITIONAL APPLICANT INFORMATION

(13) APPLICANT NAME
ORBITCOM INC

(14) STREET ADDRESS LINE NO. 1
1701 N LOUISE DR

(15) STREET ADDRESS LINE NO. 2

(16) CITY **SIOUX FALLS** (17) STATE **SD** (18) ZIP CODE **57107**

(19) DAYTIME TELEPHONE NUMBER (include area code) **(605) 977-6900** (20) COUNTRY CODE (if not in U.S.A.)

FCC REGISTRATION NUMBER (FRN) REQUIRED

(21) APPLICANT (FRN) **0007283187** (22) FCC USE ONLY

COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET

(23A) CALL SIGN/OTHER ID (24A) PAYMENT TYPE CODE (25A) QUANTITY

(26A) FEE DUE FOR (PTC) (27A) TOTAL FEE FCC USE ONLY

(28A) FCC CODE 1 (29A) FCC CODE 2

(23B) CALL SIGN/OTHER ID (24B) PAYMENT TYPE CODE (25B) QUANTITY

(26B) FEE DUE FOR (PTC) (27B) TOTAL FEE FCC USE ONLY

(28B) FCC CODE 1 (29B) FCC CODE 2

(23C) CALL SIGN/OTHER ID (24C) PAYMENT TYPE CODE (25C) QUANTITY

(26C) FEE DUE FOR (PTC) (27C) TOTAL FEE FCC USE ONLY

(28C) FCC CODE 1 (29C) FCC CODE 2

(23D) CALL SIGN/OTHER ID (24D) PAYMENT TYPE CODE (25D) QUANTITY

(26D) FEE DUE FOR (PTC) (27D) TOTAL FEE FCC USE ONLY

(28D) FCC CODE 1 (29D) FCC CODE 2

(23E) CALL SIGN/OTHER ID (24E) PAYMENT TYPE CODE (25E) QUANTITY

(26E) FEE DUE FOR (PTC) (27E) TOTAL FEE FCC USE ONLY

(28E) FCC CODE 1 (29E) FCC CODE 2

(23F) CALL SIGN/OTHER ID (24F) PAYMENT TYPE CODE (25F) QUANTITY

(26F) FEE DUE FOR (PTC) (27F) TOTAL FEE FCC USE ONLY

(28F) FCC CODE 1 (29F) FCC CODE 2



Lamb

Communication

Services

COPY

November 30, 2007

FCC/MELLON

DEC 04 2007

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

RE: Joint International/Domestic Application for the consent to a Transfer of Control of OneEighty Networks, Inc., Transferor (ITC-214-20060616-00320) to Orbitcom, Inc., Transferee

Dear Ms. Dortch;

Enclosed for the Wireline Competition Bureau's Competitive Policy Division are an original and four (4) copies of the Joint International/Domestic Application for the consent to Transfer Control of OneEighty Networks, Inc., Transferor to Orbitcom, Inc., Transferee.

The Fee Remittance Form 159 has been sent to the appropriate Mellon Bank Lockbox; a copy is enclosed. Filing has also been made with the International Bureau.

Please return the copy of this letter, date-stamped, in the enclosed postage paid envelope.

Sincerely,

Susan Lamb
Lamb Communication Services

Enclosures

COPY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

DEC 04 2007

FCC/MELLON

_____)	
In the Matter of)	
)	
OneEighty Networks, Inc.)	
Transferor,)	File No.
)	
and)	ITC-T/C-2007 _____
)	
Orbitcom, Inc.)	
Transferee,)	WC Docket No. 07- _____
)	
Joint Application for Consent to a Transfer)	
Pursuant to Section 214 of the Communications)	
Act of 1934, as Amended)	

Attn: International Bureau ITC-214-20060616-00320
Attn: Wireline Competition Bureau

**JOINT INTERNATIONAL AND DOMESTIC APPLICATION
FOR STEAMLINED CONSENT TO TRANSFER CONTROL**

Pursuant to Section 214 of the Communications Act of 1934, as amended (the "Act"),¹ and Sections 63.04 and 63.24 of the Commission's rules,² this Application seeks the consent of the Federal Communications Commission to the proposed transfer of ultimate control of OneEighty Networks, Inc., a Washington corporation ("OneEighty") to Orbitcom, Inc., a South Dakota corporation ("Orbitcom"), together referred to as "Applicants". OneEighty is a non-dominant carrier authorized by the Commission to provide international³ and domestic telecommunications services. Orbitcom is a non-dominant carrier authorized to provide domestic telecommunications services. A

¹ 47 U.S.C. § 214

² 47 C.F.R. §§ 63.04(b), 63.24(e)

³ Global or Limited Global Resale International Section 214 authorization was granted to OneEighty Networks, Inc. by the Commission in File No. ITC-214-20060616-00320 on July 7, 2006.

Domestic Supplement, containing the information required by 47 C.F.R. § 63.04, is attached hereto as Exhibit A.

Applicants seek streamlined processing of this Joint International and Domestic Application pursuant to Sections 63.03 and 63.12 of the Commission's Rules.⁴ This Application is eligible for streamlined processing pursuant to Section 63.03(b)(2)(i) of the Commission's Rules, 47 C.F.R. § 63.03(b)(2)(i), because (a) after the proposed transaction, Orbitcom; 1) will have less than 10 percent market share in the interstate, interexchange marketplace, 2) will provide competitive services exclusively in areas served by dominant local carriers that are not parties to the transaction, and (3) the Applicants are not currently dominant with respect to any domestic service, and will not become dominant with respect to any domestic service after consummation of the proposed transaction. This Application also qualifies for streamlined treatment under Section 63.12 because (a) Applicants are not affiliated with a dominant foreign carrier, (b) Orbitcom will not become affiliated with any foreign carrier as a result of the proposed transaction, and (c) none of the other provisions contained in Section 63.12(c) of the Commission's Rules, 47 C.F.R. § 63.12, apply.

Applicants seek to complete the proposed transaction on an expedited basis, and therefore request *expedited* treatment and consideration of this Application, so that Applicants' business plans can be implemented, which business plans include consummation of the proposed transfer on or about December 31, 2007.

In support of this Application, Applicants submit the following information:

I. APPLICANTS

(a) OneEighty Networks, Inc., a Washington corporation (FRN # 0006927388)

⁴ 47 C.F.R. §§ 63.03 and 63.12

OneEighty Networks, Inc. ("OneEighty") is a privately owned corporation organized under the laws of the state of Washington. OneEighty is located at 118 N Stevens St., Spokane WA, 99201. OneEighty is authorized to provide competitive telecommunication services in the states of Idaho, Oregon and Washington where they provide Internet services, narrowband⁵ and facilities-based broadband data services and private line services primarily to over 8000 customers over approximately 400 miles of fiber to small and medium-sized businesses. With this transaction, OneEighty will position itself to enhance their current product offerings with resale and facilities-based local exchange services, resale intrastate and interstate long distance, and Voice over Internet Protocol services.

OneEighty holds Section 214 authorizations from the Federal Communications Commission to provide domestic and international resale telecommunication services.⁶ OneEighty is considered a non-dominant carrier under the Commission's Rules. OneEighty has no affiliates that offer telecommunications services. The company has no affiliation, within the meaning of Section 63.09(e) of the Commission's Rules, 47 C.F.R. § 63.09(e), with a dominant U.S. or foreign facilities-based carrier.

(b) Orbitcom, Inc., a South Dakota corporation (FRN # 0007283187)

Orbitcom, Inc. ("Orbitcom") is a corporation organized under the laws of the state of South Dakota. Orbitcom's principal place of business is located at 1701 N Louise Dr., Sioux Falls SD, 57107. Orbitcom is authorized to provide competitive telecommunication services in fourteen (14) states (Arizona, Colorado, Idaho, Iowa, Minnesota, Montana, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington and

⁵ Applicants define "narrowband" as 64kps or less

⁶ See Footnote 3, *supra*.

Wyoming) where they provide facilities-based and resale local exchange services, resale intrastate long distance services and Internet services to approximately 5,000 small and medium sized business customers. As a result of this Transaction, Orbitcom will be in a position to add data services, facilities-based broadband services, private line services and Voice over Internet Protocol services.

II. DESCRIPTION OF THE TRANSACTION

On November 27, 2007 OneEighty and Orbitcom entered into an asset purchase agreement (“Agreement”) in which Orbitcom agreed to purchase certain assets and liabilities of OneEighty, including the name OneEighty Networks (“Transaction”). At the closing of the Transaction, OneEighty will continue to use the name OneEighty Networks in the states of Idaho, Oregon and Washington due to name recognition. Following the completion of the Transaction, OneEighty Networks, Inc. will be dissolved. Closing of the Transaction is contingent upon, among other things, receipt of necessary regulatory approvals from the Commission and other Governmental approvals.

Applicants emphasize that the proposed Transaction will be entirely transparent to customers of OneEighty. OneEighty does not provide any local exchange or long distance services at this time so there are no customers affected by the Transaction. Therefore, the transfer of control will not result in a change of carrier for any OneEighty customers. Immediately after consummating the transaction, OneEighty will continue to provide the identical end user services to their customers and will continue to provide these services at the same rates and pursuant to the same terms and conditions of service these customers currently receive from OneEighty. Any future changes in the rates, terms and conditions of service will be made consistent with applicable law. Further,

OneEighty will continue to provide services under the OneEighty name. The Transaction will not result in any discontinuance of service for any OneEighty customers. In sum, consummation of the Transaction will result in no perceivable changes to OneEighty's customers.

III. PUBLIC INTEREST

The Applicants respectfully submit that the Transaction serves the public interest. After consummation of the Transaction, OneEighty will dissolve the corporation but continue to operate under the name OneEighty Networks in the states of Idaho, Oregon and Washington. The Transaction involves no change in the personnel providing service directly to customers or the end user services, rates, terms and conditions of such services. As the Transaction will not affect any of OneEighty's current customers and OneEighty has no local exchange or long distance customers, existing tariffs will be modified consistent with applicable law. The transfer of control will be entirely transparent to OneEighty customers and will not have any adverse impact on them. The only change will be in the ultimate ownership of OneEighty.

The Applicants expect that the Transaction will increase competition in the telecommunications market by strengthening the Applicant's position as effective and multifaceted telecommunications carriers and allowing them to offer new services to their customers.

The Transaction will enhance OneEighty's, ability to provide reliable, competitively priced services to customers. By permitting OneEighty to strengthen its competitive position the proposed Transaction will make OneEighty a more financially

secure competitive alternative to the incumbents and promote OneEighty's ability to enter additional markets, thus expanding competitive choices for customers.

OneEighty focuses on delivering reliable, high-quality narrowband, broadband, data and Internet services primarily to the small and medium business markets. Customers currently served by OneEighty will benefit by the additional services such as facilities-based and resale local exchange services, resale interexchange services and Voice over Internet Protocol services that this transaction will afford and that promote OneEighty's expansion goals.

OneEighty is committed to exceeding customer expectations and understands that service and support are just as important as having the latest technology at competitive prices. That is why OneEighty supports its products and services with dedicated and skilled account teams. OneEighty customers can expect the same dedicated attention if the proposed Transaction is consummated.

The transfer of control of OneEighty to Orbitcom does not result in any anticompetitive effects. The transfer of control will facilitate Applicants offering of new and innovative services to its customers and expanding its service territory. The combined market share post-closing, in the interstate, interexchange market in the relevant markets will not exceed 10 percent. In all instances where Applicants would provide local exchange services, the incumbent local exchange carrier has a virtual monopoly and this Transaction will not diminish the ILEC's dominant market position. Furthermore, other competitive carriers are participants in these markets. Accordingly, the transfer of control of OneEighty to Orbitcom will increase, not degrade, the competitiveness of these markets

For each of the foregoing reasons, grant of the proposed transaction is in the public interest.

IV. INFORMATION REQUIRED BY SECTION 63.24(e) OF THE RULES

As required by Section 63.24(e) (2) of the Commission's Rules, Applicant submits the following information:

(a) Names, addresses and telephone numbers of Applicants:

Transferor

OneEighty Networks, Inc. (a Washington corporation)
118 N. Stevens St
Spokane, WA 99201
Telephone: (509) 688-8001
Facsimile: (509) 688-8010

Transferee

Orbitcom, Inc. (a South Dakota corporation)
1701 N. Louise Dr
Sioux Falls, SD 57107
Telephone: (605) 977-6900
Facsimile: (605)-373-9355

(b) The Government, State, or Territory under the laws of which each of the Applicants is organized:

Applicant	State of Organization
OneEighty Networks, Inc ("OneEighty")	Washington
Orbitcom, Inc. ("Orbitcom")	South Dakota

(c) Correspondence concerning this Application should be addressed to:

Gregory Green
Chairman and CEO
OneEighty Networks, Inc
118 N. Stevens St
Spokane, WA 99201
Telephone: (509) 688-8001
Facsimile: (509) 688-8010
Email: ggreen@go180.net

Brad VanLeur
President
Orbitcom, Inc.
1701 N. Louise Dr
Sioux Falls, SD 57107
Telephone: (605) 977-6900
Facsimile: (605)-373-9355
Email: bvanleur@svtv.com

With a copy to:

Susan Lamb
Lamb Communication Services, Inc.
111 Teal Ln
Sagle, ID 83860
Telephone: (208) 304-9474
Facsimile: (509) 752-8984
Email: susan_lamb@lambcomservices.net

(d) Statement as to previous Section 214 authorization:

OneEighty obtained its International Section 214 license to provide resale telecommunications services on July 7, 2006 in ITC-214-20060616-00320.

(e) Not applicable.

(f) Not applicable

(g) Not applicable

(h) The following persons or entities will hold a 10% or greater direct ownership interest in Orbitcom:

Upon consummation of the Transaction, OneEighty will become wholly owned by Orbitcom. Orbitcom will be the surviving corporation and directly own one-hundred percent (100%) of the equity interest in OneEighty.

The following parties will own a ten percent or greater direct or indirect interest in Orbitcom after the closing of the Transaction:

Gregory Green
118 N. Stevens St
Spokane, WA 99201
Citizenship: USA
Principal business: telecommunications
Percent of ownership: 13%

Jim Perry
1701 N. Louise Dr
Sioux Falls, SD 57107
Citizenship: US
Principal business: telecommunications
Percent of ownership: 21%

Brad VanLear
1701 N. Louise Dr
Sioux Falls, SD 57107
Citizenship: US
Principal business: telecommunications
Percent of ownership: 33%

Michael Powers
1701 N. Louise Dr
Sioux Falls, SD 57107
Citizenship: US
Principal business: telecommunications
Percent of ownership: 33%

None of Orbitcom's officers or directors sits on the boards of any foreign telecommunications carriers.

(i) Certification that Orbitcom is not a foreign carrier and is not affiliated with a foreign carrier:

As evidenced by the signatures to this Application, Orbitcom certifies that following consummation of the proposed Transaction, Orbitcom will not be a foreign carrier and will not be affiliated with any foreign carriers.

(j) Certification that Orbitcom does not intend to provide international telecommunications services to a destination country for which any of Sections 63.18Q)(l)-(4) of the Commission's Rules, 47 C.F.R. § 63.18(j)(l)-(4) is true.

As evidenced by the signatures to this Application Orbitcom certifies that it does not intend to provide international telecommunications services to a destination country for which any of Sections 63.18(j)(l)-(4) of the Commission's Rules, 47 C.F.R. § 63.18G)(l)-(4) is true. As evidenced by the signatures to this Application Orbitcom certifies that it does not intend to provide international telecommunications services to a destination country for which any of Sections 63.18(j)(l)-(4) of the Commission's Rules, 47 C.F.R. § 63.18G)(l)-(4) is true.

(k) Not applicable (see response to item (i))

(l) Not applicable (see response to item (j)).

(m) Not applicable. Orbitcom qualifies for a presumption of non-dominance under Section 63.10(a) (1) as it is not a foreign carrier, nor is it affiliated with a foreign carrier. Following the Transaction both Orbitcom and OneEighty will continue to be presumptively classified as non-dominant carriers.

(n) Certification that Orbitcom has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route and will not enter into such agreements in the future:

As evidenced by the signatures to this Application, Orbitcom certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market

power on the foreign end of the route and will not enter into such agreements in the future.

(o) Certifications by Parties that no party to this Application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 5 853(a):

As evidenced by the signatures to this Application, Applicants certify, pursuant to Sections 1.200 1 through 1.2003 of the Commission's Rules (implementing the Anti-Drug Abuse Act of 1988, 21 U.S.C. 5 3301), that they are not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti- Drug Act of 1988.

(p) Streamlined Processing.

Applicants request streamlined processing of this application pursuant to Section 63.12 of the Commission's Rules, 47 C.F.R. 5 63.12. This Application is eligible for streamlined processing pursuant to Section 63.12 of the Commission's Rules because: (1) Orbitcom, the transferee, is not affiliated with a foreign carrier; (2) Orbitcom is not affiliated with a dominant U.S. carrier; and (3) Orbitcom does not seek authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines, and none of the other scenarios outlined in Section 63.12(c) of the Commission's Rules apply. See 47 C.F.R. §§ 63.12(a)-(c).

V. CONCLUSION

For the reasons stated above, Applicants respectfully submit that the public interest, convenience, and necessity would be furthered by a grant of this Application.

Respectfully submitted,

By: 
Susan Lamb
President
Lamb Communication Services, Inc
111 Teal Ln, Sagle, ID 83860
Telephone: (208) 304-9474
Facsimile: (509) 752-8984
Email: susan_lamb@lambcomservices.net

Representing the Applicants

CERTIFICATION

On behalf of OneEighty Networks, Inc., I hereby certify that the statements in the foregoing Application for International and Domestic Section 214 Authority for Transfer of Control are true, complete, and correct to the best of my knowledge and are made in good faith.

OneEighty Networks, Inc.



By _____

Its Gregory Green, Chairman and CEO

Date November 27, 2007

CERTIFICATION

On behalf of Orbitcom, Inc., I hereby certify that the statements in the foregoing Application for International and Domestic Section 214 Authority for Transfer of Control are true, complete, and correct to the best of my knowledge and are made in good faith.

Orbitcom, Inc.

By 

Its Brad VanLeur, President

Date November 27, 2007

EXHIBIT A

DOMESTIC SUPPLEMENT TO JOINT INTERNATIONAL AND DOMESTIC APPLICATION FOR CONSENT TO TRANSFER CONTROL

- I. Pursuant to 47 C.F.R. 5 63.04(b), the following information required by 47 C.F.R. § 63.04(a)(6)-(a)(12) is supplied in connection with the attached Joint International and Domestic Application for Consent to Transfer Control.

(6) Description of the transaction:

On November 27, 2007 OneEighty Networks, Inc. (“OneEighty”) and Orbitcom, Inc. (“Orbitcom”) entered into an agreement (“Agreement”) whereby Orbitcom agrees to purchase certain assets and liabilities of OneEighty (“Transaction”). At the closing of the Transaction, Orbitcom will acquire the assets and liabilities of OneEighty. Thus, following the completion of the Transaction, OneEighty will be wholly owned by Orbitcom. Closing of the Transaction is contingent upon, among other things, receipt of necessary regulatory approvals from the Commission and other Governmental approvals.

Applicants emphasize that the proposed Transaction will be entirely transparent to customers of OneEighty. Because of the nature of this merger, the transfer of control will not result in a change of carrier for any OneEighty customers. Immediately after consummating the Transaction, OneEighty will continue to provide the identical end user services to the affected customers and will continue to provide these services at the rates and pursuant to the terms and conditions of service these customers currently receive

from OneEighty. Any future changes in the rates, terms and conditions of service will be made consistent with applicable law. Further, OneEighty will continue to provide services under the OneEighty name. The Transaction is not expected to result in any discontinuance of service for OneEighty customers. In sum, consummation of the Transaction will result in no perceivable changes to OneEighty's customers.

(7) A description of the geographic areas in which the transferor and transferees offer domestic telecommunications services, and what services are provided in each area:

OneEighty is certified to provide competitive telecommunication services and provides Internet services, narrowband and facilities-based broadband data services and private lines services primarily to small and medium-sized businesses in Idaho, Oregon and Washington in the territories of Qwest and Verizon. OneEighty has no local exchange or long distance customers at this time. As a result of this Transaction, OneEighty will be positioned to provide resale and facilities-based local exchange services, resale intrastate and interstate long distance, and Voice over Internet Protocol services. OneEighty provides data services, Internet services; facilities-based broadband and private line services to over 8000 customers and has over 400 miles of fiber in service.

Orbitcom is certified to provide competitive telecommunication services in fourteen (14) states (Arizona, Colorado, Idaho, Iowa, Minnesota, Montana, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington and Wyoming) where they provide facilities-based and resale local exchange services, resale intrastate long distance services and Internet services to approximately 5,000 small and medium-

sized business customers in territory served by Qwest. As a result of this Transaction, Orbitcom will be in a position to add data services, facilities-based broadband services and Voice over Internet Protocol services.

(8) A statement as to how the Application fits into one or more of the presumptive streamlined categories in Section 63.03 or why it is otherwise appropriate for streamlined treatment:

Orbitcom, as transferee, will have less than a 10 percent market share in the interstate, interexchange market as a result of the Transaction and will provide services exclusively in geographic areas served by a dominant local exchange carrier that is not a party to this transaction. Further, neither Orbitcom nor OneEighty is dominant with respect to any service. Therefore, this Application is appropriate for streamlined treatment pursuant to 47 C.F.R. 5 63.03(b) (2).

(9) Identification of all other Commission applications related to the same transaction:

The attached Application for consent to the transfer of control related to the provision of international telecommunications services is being submitted herewith.

OneEighty has no local exchange or long distance customers that are affected by the Transaction and therefore believes that a letter pursuant to CC Docket No. 00-257 is not required; however OneEighty and Orbitcom have jointly prepared advanced notice to be sent to OneEighty's customers in advance of the planned Transaction. A copy of the subscriber advance notification has been provided as Exhibit B.

(10) A statement of whether the Applicants are requesting special consideration because either party to the transaction is facing imminent business failure:

Applicants do not seek special consideration in this Application.

(11) Identification of any separately filed waiver requests being sought in conjunction with the transaction:

Applicants do not seek any waivers in conjunction with the transactions discussed in this Application.

(12) A statement showing how grant of the Application will serve the public interest, convenience and necessity, including any additional information that may be necessary to show the effect of the proposed transaction on competition in domestic markets:

The Applicants respectfully submit that the Transaction serves the public interest. After consummation of the Transaction, the combined company will continue to use the OneEighty name in the states of Idaho, Oregon and Washington and the corporation will be dissolved. The Transaction involves no changes to the personnel providing service directly to customers or the end user services, rates, terms and conditions of such services. As the Transaction will not affect any of OneEighty's current broadband customer's and OneEighty has no local exchange or long distance customers, existing tariffs will be modified consistent with applicable law. The transfer of control will be entirely transparent to OneEighty customers and will not have any adverse impact on them. The only change will be in the ultimate ownership of OneEighty.

The Applicants expect that the Transaction will increase competition in the telecommunications market by strengthening the Applicant's position as effective and multifaceted telecommunications carriers and allowing them to offer new services to their customers.

The Transaction will enhance OneEighty's, ability to provide reliable, competitively priced services to customers. By permitting OneEighty to strengthen its competitive position, the proposed Transaction will make OneEighty a more financially secure competitive alternative to the incumbents and promote OneEighty's ability to enter additional markets, thus expanding competitive choices for customers.

OneEighty focuses on delivering reliable, high-quality narrowband, broadband, data and Internet services to the small and medium business markets. Customers currently served by OneEighty will benefit by the additional services such as facilities-based and resale local exchange services, resale interexchange services and Voice over Internet Protocol services that this transaction will afford and that promote OneEighty's expansion goals.

OneEighty is committed to exceeding customer expectations and understands that service and support are just as important as having the latest technology at competitive prices. That is why OneEighty supports its products and services with dedicated and skilled account teams. OneEighty customers can expect the same dedicated attention if the proposed Transaction is consummated.

The transfer of control of OneEighty to Orbitcom does not result in any anticompetitive effects. The transfer of control will facilitate OneEighty's offering of new and innovative services to its customers and expanding its service territory. The combined market share post-closing, in the interstate, interexchange market in the relevant markets will not exceed 10 percent. In all instances where OneEighty would provide local exchange services, the incumbent local exchange carrier has a virtual monopoly and this Transaction will not diminish the ILEC's dominant market position.

Furthermore, other competitive carriers are participants in these markets. Accordingly, the transfer of control of OneEighty to Orbitcom will increase, not degrade, the competitiveness of these markets.

For each of the foregoing reasons, grant of the proposed transaction is in the public interest.

Exhibit B
Copy of
Subscriber Notice



November 27, 2007

Dear Valued Customer:

Since inception, we at OrbitCom (www.orbitcom.biz) and OneEighty (www.go180.net) have greatly appreciated and enjoyed the opportunity to serve customers like you. We truly believe that "our success depends on your success" and as your telecommunication service provider developing creative solutions, utilizing technology and other innovations enable us to better serve you – Our Customer.

We are proud to announce another catalyst of innovation with the merging of OrbitCom and OneEighty Networks. Scheduled to close December 15th, pending regulatory approval, our two organizations will combine to deliver facilities-based services in 14 Northwest and Mid-West states (see attached map).

By extending and combining our high-capacity networks we will provide significant benefits to our customers, including the delivery of voice, data and internet to your home and/or business on a truly converged platform.

But most importantly, the same dedicated staff which enjoyed serving you over the years will continue to support your needs in the future. While we know you have a choice of telecom providers, our customers will see no disruption of service, price increases and/or associated fees related to this transaction. While we look upon this action as a mutually beneficial merger between two respected telecom organizations, it is important that this is seamless to our customers.

Therefore we ask that you continue to contact OrbitCom Customer Care at (866.834.7837) or OneEighty Networks at (888.565.5953) for questions and requests for service and support, as well as providing us with comments regarding this transaction.

Enclosed you will find a supporting document with frequently asked questions (FAQ's) and a map of the markets served in the combined merger. We also welcome you to visit our informational web site which has the enclosed and additional information about our organizations at www.go180.net/orbitcom.

Respectfully,

Orbitcom, LLC

A handwritten signature in black ink, appearing to read "Brad VanLeur".

Brad VanLeur
President

OneEighty Networks, Inc.

A handwritten signature in black ink, appearing to read "Gregory D. Green".

Gregory D. Green
Chairman and CEO