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READ INSTRUCTIONS CAREFULLY BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION REMITTANCE ADVICE FORM 159

Approved by OMB 3060-0589 Page 1 of 1

(1) LOCKBOX # 979091 SPECIAL USE ONLY FCC USE ONLY

SECTION A - PAYER INFORMATION

(2) PAYER NAME (if paying by credit card enter name exactly as it appears on the card) DFT Communications Corporation (3) TOTAL AMOUNT PAID (U.S. Dollars and cents) \$1,130.00 (4) STREET ADDRESS LINE NO. 1 40 Temple Street (5) STREET ADDRESS LINE NO. 2

(6) CITY Fredonia (7) STATE NY (8) ZIP CODE 14063-0209 (9) DAYTIME TELEPHONE NUMBER (include area code) (716) 673-3021 (10) COUNTRY CODE (if not in U.S.A.)

FCC REGISTRATION NUMBER (FRN) REQUIRED

(11) PAYER (FRN) 0012927190 (12) FCC USE ONLY

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 Brick Skirt Holdings, Inc. (14) STREET ADDRESS LINE NO. 1 40 Temple Street (15) STREET ADDRESS LINE NO. 2

(16) CITY Fredonia (17) STATE NY (18) ZIP CODE 14063-0209 (19) DAYTIME TELEPHONE NUMBER (include area code) (716) 673-3021 (20) COUNTRY CODE (if not in U.S.A.)

FCC REGISTRATION NUMBER (FRN) REQUIRED

(21) APPLICANT (FRN) 0023771140 (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 CDT (25A) QUANTITY 1 (26A) FEE DUE FOR (PTC) \$1,130.00 (27A) TOTAL FEE \$1,130.00 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

SECTION D - CERTIFICATION

CERTIFICATION STATEMENT I, _____, 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 _____ DATE _____

SECTION E - CREDIT CARD PAYMENT INFORMATION

MASTERCARD _____ VISA _____ AMEX _____ DISCOVER _____ ACCOUNT NUMBER _____ EXPIRATION DATE _____ I hereby authorize the FCC to charge my credit card for the service(s) authorization herein described. SIGNATURE _____ DATE _____

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

ORIGINAL

In the Matter of)
)
Brighton Communications Corporation) WC Docket No. _____
Transferor)
)
Brick Skirt Holdings, Inc.)
Transferee)
)
For the Transfer of Control of DFT Communications Corporation)
and its subsidiaries, which provide interstate interexchange and)
exchange access services in New York pursuant to blanket)
domestic Section 214 authorizations)

TO: Wireline Competition Bureau

**STREAMLINED APPLICATION FOR TRANSFER OF CONTROL
OF DOMESTIC BLANKET SECTION 214 AUTHORIZATIONS**

Brighton Communications Corporation (“Brighton” or “Transferor”; FRN: 0012-9267-05) and Brick Skirt Holdings, Inc. (“Brick Skirt” or “Transferee”; FRN: 0023-7711-40) hereby request Commission authorization for the transfer of control from Brighton to Brick Skirt of DFT Communications Corporation (“DFT Communications”; FRN: 0012-9271-90), a holding company whose subsidiaries provide interstate interexchange and exchange access services as incumbent local exchange carriers (“ILECs”) and a competitive local exchange carrier (“CLEC”) in the State of New York pursuant to blanket domestic Section 214 authorizations.

DFT Communications is a Delaware holding company that directly or indirectly owns 100 percent of the issued and outstanding stock of the following providers of domestic telecommunications services that hold blanket domestic Section 214 authorizations: (a) Dunkirk and Fredonia Telephone Company (“Dunkirk & Fredonia”; FRN: 0003-4142-24), an ILEC that provides local exchange and exchange access services in the Fredonia, New York exchange

which serves the communities of Fredonia, Pomfret, Portland, Sheridan, Arkwright, Charlotte, Dunkirk and Stockton in Chautauqua County in western New York State; (2) Cassadaga Telephone Corporation (“Cassadaga”; FRN: 0003-7498-19), an ILEC that provides local exchange and exchange access services in the Cassadaga, New York exchange which serves the communities of Cassadaga, Pomfret, Charlotte and Stockton in Chautauqua County in western New York State; and (3) DFT Local Service Corporation (“DFT Local”; FRN: 0003-7498-43), a CLEC and interexchange carrier that provides local exchange, private line and long distance toll services in Chautauqua County and adjacent areas of western New York State.

Brighton, the present owner of DFT Communications and its subsidiaries, is a wholly-owned subsidiary of LICT Corporation (“LICT”). LICT is a publicly traded corporation that owns eleven other independent ILECs located in the states of New Hampshire, California, Oregon, Iowa, Utah, Wisconsin, Kansas, Michigan and New Mexico, as well as six other CLECs with operations in located in Iowa, Illinois, Oregon, California, Michigan, New Mexico, Kansas and Utah.

Brick Skirt is a newly formed Delaware corporation that was created for the purpose of acquiring DFT Communications and its subsidiaries. It is owned by the Maytum family which owned and operated Dunkirk & Fredonia and Cassadaga before they were sold to LICT in 1996, and which has continued to manage the DFT Communications companies since that time.

The proposed transaction involves the purchase and sale of all of the issued and outstanding stock of DFT Communications by Brighton to Brick Skirt. By acquiring all of the issued and outstanding stock of DFT Communications at the time of the transaction, Brick Skirt will acquire ultimate control of the blanket Section 214 authorizations of Dunkirk & Fredonia, Cassadaga and DFT Local. The parties further note that their stock purchase agreement gives

Brighton a warrant to purchase up to 20 percent of the stock of Brick Skirt for a period of five years. However, even if such warrant is exercised in full, control of Brick Skirt, and indirect control of DFT Communications, Dunkirk & Fredonia, Cassadaga and DFT Local, will remain firmly with the Maytum family.

Although members of the Maytum family have been managing the DFT Communications companies, they have been doing so as employees rather than owners and the newly formed Brick Skirt is not a telecommunications provider. Therefore, this application qualifies for streamlined processing pursuant to Section 63.03(b)(1)(ii) of the Commission's Rules.

In accordance with the requirements of Section 63.04(a) of the Commission's Rules, the applicants submit the following information:

(1) Name, address and telephone number of each applicant:

Transferors:

Brighton Communications Corporation
401 Theodore Fremd Avenue
Rye, New York 10580
Telephone: (914) 921-8821
Facsimile: (914) 921-6410

Transferee :

Brick Skirt Holdings, Inc.
40 Temple Street
Fredonia, New York 14063
Telephone: (716) 673-3021
Facsimile: (716) 673-3027

(2) Government, state or territory under the laws of which each corporate or partnership applicant is organized:

Brighton Communications Corporation is a Delaware corporation.

LICT Corporation is a Delaware corporation.

Brick Skirt Holdings, Inc. is a Delaware corporation.

DFT Communications Corporation is a Delaware corporation.

Dunkirk and Fredonia Telephone Company is a New York corporation.

Cassadaga Telephone Corporation is a New York corporation.

DFT Local Service Corporation is a Delaware corporation.

(3) Name, title, post office address, and telephone number of the officer or contact person to whom correspondence concerning the application is to be addressed:

For Transferor:

Robert E. Dolan, President
Brighton Communications Corporation
401 Theodore Fremd Avenue
Rye, New York 10580
Telephone: (914) 921-8821
Facsimile: (914) 921-6410

For Transferee:

Mark R. Maytum, President
Brick Skirt Holdings, Inc.
40 Temple Street
Fredonia, New York 14063
Telephone: (716) 673-3021
Facsimile: (716) 673-3027

With a copy to Counsel:

Gerard J. Duffy
Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP
2120 L Street, N.W. (Suite 300)
Washington, D.C. 20037
Telephone: (202) 659-0830
Facsimile: (202) 828-5568

- (4) Name, address, citizenship and principal business of any person or entity that directly owns at least ten (10) percent of the equity of the applicant, and the percentage of equity owned by each of those entities:

DFT Companies (Before Transaction)

The name, address, citizenship and principal business of the only entity that owns at least ten (10) percent of the equity and voting power of Cassadaga Telephone Corporation before and after the proposed transaction are:

<u>Name & Address</u>	<u>Voting & Equity</u>	<u>Citizenship</u>	<u>Principal Business</u>
Dunkirk and Fredonia Telephone Company 40 Temple Street Fredonia, NY 14063	100.00%	New York Corporation	Telecommunications

The name, address, citizenship and principal business of the only entity that owns at least ten (10) percent of the equity and voting power of Dunkirk and Fredonia Telephone Company before and after the proposed transaction are:

<u>Name & Address</u>	<u>Voting & Equity</u>	<u>Citizenship</u>	<u>Principal Business</u>
DFT Telephone Holding Company, LLC 40 Temple Street Fredonia, NY 14063	100.00%	Delaware Limited Liability Company	Telecommunications

The name, address, citizenship and principal business of the only entity that owns at least ten (10) percent of the equity and voting power of DFT Telephone Holding Company, LLC and of DFT Local Service Corporation before and after the proposed transaction are:

<u>Name & Address</u>	<u>Voting & Equity</u>	<u>Citizenship</u>	<u>Principal Business</u>
DFT Communications Corporation 401 Theodore Fremd Ave. Rye, NY 10580	100.00%	Delaware Corporation	Telecommunications

The name, address, citizenship and principal business of the only entity that owns at least ten (10) percent of the equity and voting power of DFT Communications Corporation before the proposed transaction are:

<u>Name & Address</u>	<u>Voting & Equity</u>	<u>Citizenship</u>	<u>Principal Business</u>
Brighton Communications Corporation 401 Theodore Fremd Avenue Rye, NY 10580	100.00%	Delaware Corporation	Telecommunications

The name, address, citizenship and principal business of the only entity that owns at least ten (10) percent of the equity and voting power of Brighton Communications Corporation before and after the proposed transaction are:

<u>Name & Address</u>	<u>Voting & Equity</u>	<u>Citizenship</u>	<u>Principal Business</u>
LICT Corporation 401 Theodore Fremd Avenue Rye, NY 10580	100.00%	Delaware Corporation	Telecommunications

The name, address, citizenship and principal business of the only entity that directly owns at least ten (10) percent of the equity and voting power of LICT Corporation before and immediately after the proposed transaction are:

<u>Name & Address</u>	<u>Voting & Equity</u>	<u>Citizenship</u>	<u>Principal Business</u>
MJG 1999 Descendants Trust 401 Theodore Fremd Avenue Rye, NY 10580	26.73%	Delaware Trust	Investments

John Gabelli, brother of Mario J. Gabelli is a Trustee of the MJG 1999 Descendants Trust. He is a U.S. citizen and can be contacted at the Rye, New York address.

LICT Corporation is a publicly traded corporation. Whereas Mario J. Gabelli, its Chairman and Chief Executive Officer, directly owns less than ten percent of LICT Corporation's equity and voting power, he has an interest in another entity that owns LICT Corporation stock which, if attributed to him for purposes of the Commission's calculation of the ownership of LICT Corporation regarding this application, would put his direct and attributed indirect interests over the ten percent level. Mario J. Gabelli is a U.S. citizen and can be contacted at the Rye, New York address.

No other individual or entity owns ten percent or more of the issued and outstanding stock of LICT Corporation DTC prior to or immediately after the proposed transaction. Please note that the term "immediately after the proposed transaction" is used with respect to LICT Corporation only because it is a publicly traded corporation whose ownership is potentially subject to significant changes at any time.

DFT Companies (After Transaction)

The name, address, citizenship and principal business of the only entity that will own at least ten (10) percent of the equity and voting power of Cassadaga Telephone Corporation before and after the proposed transaction are:

<u>Name & Address</u>	<u>Voting & Equity</u>	<u>Citizenship</u>	<u>Principal Business</u>
Dunkirk and Fredonia Telephone Company 40 Temple Street Fredonia, NY 14063	100.00%	New York Corporation	Telecommunications

The name, address, citizenship and principal business of the only entity that will own at least ten (10) percent of the equity and voting power of Dunkirk and Fredonia Telephone Company before and after the proposed transaction are:

<u>Name & Address</u>	<u>Voting & Equity</u>	<u>Citizenship</u>	<u>Principal Business</u>
DFT Telephone Holding Company, LLC 40 Temple Street Fredonia, NY 14063	100.00%	Delaware Limited Liability Company	Telecommunications

The name, address, citizenship and principal business of the only entity that will own at least ten (10) percent of the equity and voting power of DFT Telephone Holding Company, LLC and of DFT Local Service Corporation before and after the proposed transaction are:

<u>Name & Address</u>	<u>Voting & Equity</u>	<u>Citizenship</u>	<u>Principal Business</u>
DFT Communications Corporation 40 Temple Street Fredonia, NY 14063	100.00%	Delaware Corporation	Telecommunications

The name, address, citizenship and principal business of the only entity that will own at least ten (10) percent of the equity and voting power of DFT Communications Corporation after the proposed transaction are:

<u>Name & Address</u>	<u>Voting & Equity</u>	<u>Citizenship</u>	<u>Principal Business</u>
Brick Skirt Holdings, Inc. 40 Temple Street Fredonia, NY 14063	100.00%	Delaware Corporation	Telecommunications

The names, addresses, citizenship and principal businesses of the only entities that will own at least ten (10) percent of the equity and voting power of Brick Skirt Holdings, Inc. after the proposed transaction are:

<u>Name & Address</u>	<u>Voting & Equity</u>	<u>Citizenship</u>	<u>Principal Business</u>
Robert A. Maytum 40 Temple Street Fredonia, NY 14063	50.00%	U.S.A.	Telecommunications
Mark R. Maytum 40 Temple Street Fredonia, NY 14063	16.66%	U.S.A.	Telecommunications
Kurt W. Maytum 40 Temple Street Fredonia, NY 14063	16.66%	U.S.A.	Telecommunications

<u>Name & Address</u>	<u>%</u> <u>Voting & Equity</u>	<u>Citizenship</u>	<u>Principal Business</u>
Sheri Stoltenberg 40 Temple Street Fredonia, NY 14063	16.66%	U.S.A.	Telecommunications

Robert A. Maytum is the father of Mark R. Maytum and Kurt W. Maytum. Sheri Stoltenberg is the niece of Robert A. Maytum.

No other individual or entity will directly or indirectly own or control at least ten (10) percent of the equity or voting power of DFT Communications Corporation and its subsidiaries after the proposed transaction.

(5) Certification pursuant to 47 C.F.R. §§1.2001 through 1.2003 that no party to the application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

Brighton and Brick Skirt hereby certify, pursuant to 47 C.F.R. §§1.2001 through 1.2003, that no party to the present application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

(6) Description of the transaction:

Brick Skirt is purchasing all of the issued and outstanding stock of DFT Communications from Brighton. Acquisition of this stock will give Brick Skirt control of DFT Communications and its subsidiaries, including the blanket domestic Section 214 authorizations of Dunkirk & Fredonia, Cassadaga and DFT Local.

As noted above, the stock purchase agreement between the applicants gives Brighton a warrant to purchase up to 20 percent of the stock of Brick Skirt for a period of five years. However, even if such warrant is exercised in full, the remaining 80 percent interest directly controlling of Brick Skirt, and indirect controlling DFT Communications, Dunkirk & Fredonia, Cassadaga and DFT Local, will remain firmly with the Maytum family.

(7) Description of the geographic areas in which the transferor and transferee (and their affiliates) offer domestic telecommunications services, and what services are provided in each area:

Areas and Services of DFT Communications and its Affiliates.

DFT Communications and its wholly-owned subsidiary DFT Telephone Holding Company, LLC (“DFT Holding Company”) are holding companies that do not directly provide domestic or other telecommunications services.

Dunkirk & Fredonia, a wholly-owned subsidiary of DFT Holding Company, provides local exchange service and exchange access service as an ILEC in the Village of Fredonia, and the Towns of Pomfret, Portland, Sheridan, Arkwright, Charlotte, Dunkirk and Stockton (approximately 7,200 access lines) in Chautauqua County in western New York State. In addition to local telephone service, Dunkirk & Fredonia provides custom calling features and resells WildBlue satellite services.

Cassadaga, a wholly-owned subsidiary of Dunkirk & Fredonia, provides local exchange service and exchange access service as an ILEC in the Village of Cassadaga, and the Towns of Pomfret, Charlotte and Stockton (approximately 860 access lines) in Chautauqua County in western New York State. In addition to local telephone service, Cassadaga provides custom calling features.

DFT Local, a wholly-owned subsidiary of DFT Communications, provides local exchange service as a CLEC (less than 5,000 access lines), as well as private line and long distance toll services, in Chautauqua County and adjacent areas of western New York State.

Netsync Internet Services Corporation, a wholly-owned subsidiary of DFT Communications, provides dial-up, high-speed and related Internet access and web services, plus a variety of equipment sales, leasing and maintenance services and DirecTV satellite services, in Chautauqua County and adjacent areas of western New York State.

DFT Security Services, Inc., a wholly-owned subsidiary of DFT Communications, provides electronic security monitoring sales and services, plus call center services, in Chautauqua County and adjacent areas of western New York State.

Macom, Inc., a wholly-owned subsidiary of Cassadaga, provides electrical contracting services in Chautauqua County and adjacent areas of western New York State.

Comantel, Inc., a wholly-owned subsidiary of Dunkirk & Fredonia, formerly provided various equipment sales and maintenance services in Chautauqua County and adjacent areas of western New York State, but is being dissolved at this time.

DFT Communications has no ownership interests in any other entity that offers domestic telecommunications services.

Areas and Services of Brighton and Affiliates

LICT and Brighton are holding companies that do not directly provide domestic or other telecommunications services.

LICT directly, or indirectly through intermediate holding companies, owns the following ILECs: (1) Bretton Woods Telephone Company, which serves the Bretton Woods Resort Area in New Hampshire; (2) California-Oregon Telephone Company, a diversified communications company that offers services in the Butte Valley and Tule Lake areas of northern California, as well as some areas of southern Klamath County, Oregon; (3) Central

Scott Telephone Company, which serves the North Scott area in Eldridge, Iowa; (4) CentraCom Interactive, which provides full-service communications services in central and northern Utah; (5) Cuba City Telephone Exchange Company and Belmont Telephone Company, which provide telecommunications services in southwestern Wisconsin; (6) Haviland Telephone Company, which serves south-central Kansas; (7) JBN Telephone Company, which serves northeast Kansas; (8) Michigan Central Broadband Company, L.L.C, which serves the lower peninsula area of Michigan; (9) Upper Peninsula Telephone Company, which serves the upper peninsula area of Michigan; and (10) Western New Mexico Telephone Company, which serves southwestern New Mexico.

In addition, LICT directly, or indirectly through intermediate holding companies, owns the following CLECs: (1) CS Technologies, which provides service in Iowa and Illinois; (2) Cal-Ore Communications, Inc., which provides service in Oregon and California; (3) Michigan Central Broadband Company, LLC, which provides service in Michigan; (4) Interactive Networks Corporation, d/b/a WNM Communications Corporation, which provides service in New Mexico; (5) Giant Communications, Inc., which provides service in Kansas; and (6) Central Telecom Services, LLC, which provides service in Utah.

Brighton has no other affiliates that offer domestic telecommunications services.

(8) 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:

This application fits within the presumptive streamlined categories in Section 63.03(b) of the Commission's Rules, and streamlined treatment is requested. Because the transferee Brick Skirt is a newly formed corporation that is not a telecommunications provider, the transaction fits within Section 63.03(b)(1)(ii) of the Rules. The parties note that, whereas the Maytum family has been managing the telecommunications provider subsidiaries of DFT Communications, the Maytum family has not owned or controlled these service providers since they sold them to the LICT organization in 1996. Rather, the Maytum family has been managing the DFT Communications subsidiaries as employees subject to the control of Brighton and LICT.

In addition, the proposed transaction fits within Section 63.03(b)(2)(iii) because (a) DFT Communications and the remaining LICT ILEC and CLEC subsidiaries have a market share in the interstate, interexchange market of less than 10 percent; (b) DFT Communications and the remaining LICT ILEC and CLEC subsidiaries have together less than 60,000 access lines which constitute far fewer than two (2) percent of the nation's subscriber lines installed in the aggregate nationwide; and (c) there are no overlapping or adjacent service areas between the western New York service area of the DFT Communications subsidiaries and the New Hampshire, California, Oregon, Iowa, Utah, Wisconsin, Kansas, Michigan and New Mexico, service areas of LICT's remaining ILEC and CLEC subsidiaries, and Brick Skirt does not currently provide telecommunications services and thus has no overlapping or adjacent service areas.

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

The parties will also file an application with the International Bureau for consent to the transfer of control of the International Section 214 authorization for global resale held by DFT Local Service Corporation (File No. ITC 214-20000420-00234).

On July 11, 2014, the parties filed the following applications for consent to the transfer of control of the following radio station licenses of Dunkirk and Fredonia Telephone Company and its subsidiary, Netsync Internet Service Corporation from Brighton Communications Corporation to Brick Skirt Holdings, Inc.: (a) Conventional Industrial/Business Pool Service station KCY525 (ULS File No. 0006366787) and (b) 3650 - 3700 MHz Service station WQOZ204 (ULS File No. 0006366792).

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

No party to the transaction is facing imminent business failure at this time. Therefore, the applicants are not requesting special consideration because a party to the transaction is facing imminent business failure.

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

The parties will file no separate waiver requests in conjunction with the subject transaction.

(12) 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 proposed transaction entails the re-acquisition of Dunkirk & Fredonia and Cassadaga by the Maytum family which had owned them for decades prior to their sale to the LICT organization in 1996, and which has continued to manage the two rural ILECs and their affiliates as employees of the LICT organization since that time. The Maytum family has a long and proven record of interest in serving the rural Chautauqua County areas where they have lived for decades, as well as a proven record of providing quality and affordable telecommunications services to these areas and their residents. The proposed transaction will ensure that Chautauqua County and nearby western New York customers will continue to receive quality and affordable telecommunications services during the foreseeable future.

Conclusion

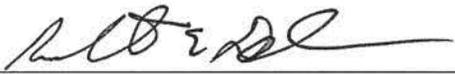
In light of the foregoing facts and public interest considerations, the Commission is respectfully requested to authorize the transfer of control of DFT Communications Corporation, and particularly the blanket domestic Section 214 authorizations of Dunkirk and Fredonia Telephone Company, Cassadaga Telephone Corporation and DFT Local Service Corporation from Brighton Communications Corporation to Brick Skirt Holdings, Inc.

Brighton Communications Corporation and Brick Skirt Holdings, Inc. reiterate that they certify, pursuant to 47 C.F.R. §§1.2001 through 1.2003, that no party to the present application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

Respectfully submitted,

**BRIGHTON COMMUNICATIONS
CORPORATION**

BRICK SKIRT HOLDINGS, INC.

By: 

By: _____

Printed Name: Robert F. Dolan

Printed Name: _____

Title: President

Title: _____

Date: July 16, 2014

Date: _____

Conclusion

In light of the foregoing facts and public interest considerations, the Commission is respectfully requested to authorize the transfer of control of DFT Communications Corporation, and particularly the blanket domestic Section 214 authorizations of Dunkirk and Fredonia Telephone Company, Cassadaga Telephone Corporation and DFT Local Service Corporation from Brighton Communications Corporation to Brick Skirt Holdings, Inc.

Brighton Communications Corporation and Brick Skirt Holdings, Inc. reiterate that they certify, pursuant to 47 C.F.R. §§1.2001 through 1.2003, that no party to the present application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

Respectfully submitted,

BRIGHTON COMMUNICATIONS CORPORATION

BRICK SKIRT HOLDINGS, INC.

By: _____

By: Mark R. Maytum

Printed Name: _____

Printed Name: Mark R. Maytum

Title: _____

Title: President

Date: _____

Date: July 16, 2014