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January 25, 2023

## **By Electronic Filing**

Gary Widerburg Commission Administrator Utah Public Service Commission 160 East 300 South, 4th Floor Salt Lake City, UT 84111

## *Re:* Notice of an internal reorganization of Intrado Communications, LLC

Dear Mr. Widerburg:

Intrado Communications, LLC ("Intrado Communications") hereby notifies the Commission of its intent to complete a minor internal reorganization that will result in a *pro forma* change in its ownership structure without affecting the company's ultimate ownership or control. The internal reorganization also will not affect Intrado Communications' customers; will not change the services provided under its operating authority; and will not result in any change in Intrado Communications' managerial, technical, or financial qualifications. Intrado Communications submits this notice for informational purposes to ensure the continuing accuracy of the Commission's records.

Intrado Communications is a Delaware limited liability company, and its principal place of business is located at 3200 W. Pleasant Run Road, Suite 300, Lancaster, Texas 75146. Intrado Communications provides wholesale local and national tandem switching and transport services, termination services, toll-free origination services, and Direct Inbound Dial services to telecommunications and information service providers, including wireless carriers, wireline competitive local exchange carriers, and interexchange carriers; cable telephony providers; and Voice over Internet Protocol providers. Intrado Communications provides service to its customers using its nationwide optical backbone network that is both IP- and TDM-based. While Intrado Communications owns and operates its own network equipment, it leases transmission lines (including access circuits) from other carriers. Intrado Communications' services are currently available in 48 states<sup>1</sup> and the District of Columbia.

On May 22, 2020, Intrado Communications was authorized by the Commission to provide facilities-based interconnection or resale services throughout Utah in Docket No. 20-2617-01.<sup>2</sup> Intrado Communications currently is a wholly owned direct subsidiary of Intrado Communications Holdings, LLC ("ICH"). A description of the current corporate structure of Intrado Communications is provided in Exhibit A, which also depicts the internal reorganization. Specifically, an entity in Intrado Communications' control chain will be replaced with a different entity with identical ownership and control (i.e., Mount Olympus Holdings, Inc. will be replaced by West-Olympus, LLC). No other changes to Intrado Communications' ownership structure are anticipated.

Intrado Communications' internal reorganization will serve the public interest. Following the reorganization, the company will continue to be ultimately owned and controlled by the same parties that own and control the company today. In addition, Intrado Communications will continue to provide services to its existing customers pursuant to the same rates, terms, and

<sup>&</sup>lt;sup>1</sup> Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin, and Wyoming.

<sup>&</sup>lt;sup>2</sup> See Application of Intrado Communications, LLC for a Certificate of Public Convenience and Necessity, Report and Order, Docket No. 20-2617-01 (May 22, 2020).

conditions. Accordingly, this internal reorganization will be imperceptible to the customers and vendors of the Intrado Communications and will not result in any discontinuance, reduction, loss, or impairment of service to any customer. Further, Intrado Communications will continue to be operated by the same highly experienced, well-qualified management and technical personnel who operate the company today. The internal reorganization also will not adversely affect competition because it will not result in any reduction in the number of competitors serving any market and will not impact the competitiveness of any market for telecommunications services. Following the transaction, customers will continue to have access to the same competitive alternatives that they have today.

Please do not hesitate to contact the undersigned with any questions regarding this notice.

Respectfully submitted,

<u>/s/Phillip R. Marchesiello</u> Phillip R. Marchesiello Wilkinson Barker Knauer, LLP 1800 M Street, N.W., Suite 800N Washington, D.C. 20036 Tel: (202) 783-4141 pmarchesiello@wbklaw.com

Counsel for Intrado Communications, LLC

January 25, 2023

## EXHIBIT A: PRE-CLOSING AND POST-CLOSING ORGANIZATIONAL DIAGRAMS



