

December 13, 2022

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NW
Washington, DC 20554

Attn: International Bureau

**RE: Schaller Telephone Company, Comserv, Ltd. and Long Lines, LLC
Notification of *Pro Forma* Transaction**

Dear Ms. Dortch:

Schaller Telephone Company (“Schaller” or “Assignee”), Comserv, Ltd. (“Comserv” or “Assignor”) and Long Lines, LLC (“Long Lines”) (jointly, “the Parties”), by counsel, submit this Notification of Pro Forma Transfer, pursuant to Section 63.24(d) of the Commission’s rules, 47 C.F.R. 63.24(d).

Schaller holds blanket domestic 214 authority and international 214 authority File No. ITC-214-20160210-00101 and provides telecommunications services to customers in the communities of Schaller, Galva, Cushing, and Kiron (less than 2,000 access lines) in the counties of Sac, Ida, Woodbury, Crawford, Buena Vista and Cherokee in northwest Iowa. Long Lines, LLC is a Delaware limited liability company organized as a holding company for ILECs, CLECs and cable providers offering broadband, video and voice services in sixteen communities in Iowa, Nebraska, and South Dakota. The company holds international and domestic 214 authority, File No. ITC-214-20160210-00101.

By this pro forma transfer filing the Parties provide the Commission notice of a 2011 corporate reorganization by which Schaller consolidated its 27.5% interest in Advanced Network Communications, L.L.C. (“Advanced”) with a 22.5% interest in Advance held by Schaller’s wholly owned subsidiary, Comserv, Ltd. (“Comserv”).

As described in prior filings, in 2005 Schaller transferred 50% of its equity interests in Advance to Long Lines, LLC (“Long Lines”). The remaining 50% of the equity interest in Advanced was at the time divided between Schaller, which held a 27.5% interest, and Comserv, which held a 22.5% interest. Prior to and following the 2005 transaction, Comserv was a wholly-owned subsidiary of Schaller. The 2005 transaction was seamless to customers and did not result in any loss or impairment of service. Likewise, the transaction had no adverse effects on competition in any geographic areas where Advanced was providing service.

The 2005 transaction resulted in a joint venture arrangement pursuant to which Schaller, Comserv, and Long Lines each held ownership interests in Advanced. Schaller and Long Lines jointly operated Advanced under the joint venture arrangement, with each company contributing

to certain operational aspects. Long Lines oversaw the management, Internet, accounting, etc. Schaller provided customer services and technical support.

Effective December 31, 2011, Comserv's 22.5% interest in Advanced was assigned to Schaller as part of a corporate reorganization. Prior to the 2011 reorganization, Schaller held a 27.5% direct interest in Advanced and, via its 100% ownership of a Comserv, a 22.5% indirect interest in Advanced. Following the 2011 reorganization, Schaller owned a 50% direct interest in Advanced, with Long Lines likewise owning a 50% direct interest in Advanced.

As with the 2005 transaction, the 2011 reorganization was seamless to customers and did not result in any loss or impairment of service. Likewise, the transaction had no adverse effects on competition in any geographic areas where Advanced was providing service. Because Comserv was a wholly-owned subsidiary of Schaller, and because the transfer of Comserv's 22.5% interest in Advanced to Schaller did not result in any change in the identity or ultimate control of Schaller or Advanced, the transaction is *pro forma* in nature.

As required by Section 63.24(f)(2) of the Commission's rules the Parties provide the following information required by 63.18(a) through (d), and (h), of the rules:

Section 63.18(a): Name, address and telephone number of Schaller

Schaller Telephone Company
111 West Second Street, PO Box 9
Schaller, Iowa 51053
Telephone: (712) 275-4211

Section 63.18(b): Schaller is an Iowa corporation.

Section 63.18(c): Correspondence concerning this filing should be sent to:

Schaller Telephone Company
111 West Second Street, PO Box 9
Schaller, Iowa 51053
Attn: Missy Kestel, President
Telephone: (712) 275-4211
Facsimile: (712) 275-4121
Email: allison@schallertel.net

With a copy to Counsel:
Cody McCullough
Crary Huff Law Firm
329 Pierce Street, #200
Sioux City, Iowa 51101
Telephone: (712) 224-7559
Facsimile: (712) 224-4532
Email: cmccullough@craryhuff.com

Long Lines, LLC
501 4th Street
Sergeant Bluff, IA 51054
Attn: Paul Bergmann, CFO
Telephone: (712) 271-2710
Facsimile: (712) 277-4605
Email: pbergmann@longlines.biz

With a copy to Counsel:
John Smarrella
Barnes & Thornburg, LLP
201 S. Main Street, Suite 400
South Bend, IN 46601-2130
Telephone: (574) 237-1133
Facsimile: (574) 237-1125
Email: John.Smarrella@btlaw.com

Section 63.18(d): Schaller provides international resale telecommunications services pursuant to FCC File No. ITC-214-20160210-00101.

Section 63.18(h): The name, address, citizenship and principal business activity of any person have a 10% or greater interest in Schaller is set forth in Exhibit A.

There are no interlocking officers or directors to report.

For the reasons discussed herein, a grant of consent for the pro forma transfer of control of Advanced would be consistent with public interest considerations and is respectfully requested. Should you have any questions about this matter or require additional information please contact the undersigned at your convenience. Thank you for your attention to this matter.

Respectfully submitted,

/s/ John Pietila

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/s/ K.C. Halm

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202-973-4287 (tel.)
202-973-4487 (fax)
kchalm@dwt.com

Exhibit A

10% or Greater Interest Holders in Schaller Telephone Company

The name, address, citizenship, and principal business of the persons and entities that directly or indirectly own at least ten percent (10%) of the equity of Schaller Telephone Company, and the percentage equity owned by each of those entities, is as follows:

Name:	Steven S. Reimers Family Trust
Address:	111 West Second Street Schaller, IA 51053
%Held:	40%
Trustee:	JoAnn Reimers, U.S. citizen

Name:	Melissa Kestel
Address:	111 West Second Street Schaller, IA 51053
%Held:	60%

JoAnn Reimers is the spouse of Steven S. Reimers. The beneficiary of the Steven S. Reimers Family Trust is Melissa Kestel, who is a U.S. citizen and the daughter of Steven S. Reimers and JoAnn Reimers. There is no other entity or individual with a ten percent (10%) or greater direct or indirect ownership or voting interest in Schaller Telephone Company or its direct or indirect parent entities.

Except as disclosed above, there is no other entity or individual with a ten percent (10%) or greater direct or indirect ownership or voting interest in Applicant or its direct or indirect parent entities.