ATTACHMENT 1

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

Joint Application of	)
Siren Telephone Company, Inc. Transferor,	)
and	)
Lakeland Communications, Inc., Transferee,	)
For Consent To Transfer Control of Domestic And International Section 214 Authority Held By Siren Telephone Company, Inc. Pursuant to A Stock Purchase Agreement	)

JOINT APPLICATION

Pursuant to Section 214 of the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. §214, and Sections 63.01, 63.04, 63.18, and 63.24 of the Commission's rules, 47 C.F.R. §§63.01, 63.04, 63.18, and 63.24, Siren Telephone Company, Inc. ("STC" or "Transferor") and Lakeland Communications, Inc. ("LCI" or "Transferee") (collectively STC and LCI are the "Applicants") hereby request Federal Communications Commission ("Commission" or "FCC") consent for the transfer of control of the domestic Section 214 and international Section 214 authority held by STC to LCI, pursuant to a Stock Purchase Agreement ("Agreement"). The transfer of control pursuant to the Agreement is hereinafter referred to as the transaction ("Transaction"). STC and LCI intend to consummate the Transaction following Commission approval of the same.

ATTACHMENT 1

In Section IV of this Joint Application, the Applicants provide information required for the transfer of both the domestic Section 214 authorization and the international Section 214 authorization. In Section V of this Joint Application, the Applicants provide additional information required solely for the transfer of the international Section 214 authorization. In Section VI of this Joint Application, the Applicants provide additional information required solely for the transfer of the domestic Section 214 authorization.

The Applicants request expeditious approval of the Transaction. The Transaction will not result in a change of the terms and conditions of domestic service to current customers of STC or of international service to current customers of STC's wholly owned subsidiary, Siren Communications, Inc. ("SCI").[1] STC and SCI operate under the trade name "Siren Tel." Further, the Transaction raises no competitive issues. The domestic and international service area of STC and SCI does not overlap with and is not adjacent to the service area of LCI's wholly owned subsidiary Lakeland Communications Group, LLC, which provides domestic and international services.[2] Expeditious approval of the Transaction will serve the public interest as set forth herein.

I. DESCRIPTION OF THE APPLICANTS AND AUTHORIZATION HOLDERS.

A. Siren Telephone Company, Inc.

Siren Telephone Company, Inc. is a Wisconsin corporation and an incumbent local exchange carrier ("ILEC") with headquarters in Siren, Wisconsin. STC provides facilities based local voice and exchange access services, long distance services through resale arrangements with other carriers, and high-speed Internet services primarily in Burnett County, Wisconsin.

[1] SCI provides international service pursuant to the international 214 authorization held by its parent, STC, as set forth more fully in Section I.B. herein.
[2] LCI does not provide any communications services.

ATTACHMENT 1

The company's ILEC exchange service area covers the eastern portion of Burnett County. STC's voice services are provided as Time Division Multiplexing ("TDM") and Voice over Internet Protocol ("VoIP") throughout its service area. STC's ILEC service area is documented on the attached Exhibit C in the area outlined in pink.

STC is an eligible telecommunications carrier ("ETC") pursuant to Section 214(e) of the Act. STC receives Universal Service Fund ("USF") high cost support through the Enhanced Alternative Connect America Cost Model ("E-ACAM") program in its Study Area Code ("SAC") 330949.[3] STC participates in the Lifeline program.[4] STC does not have any affiliates that receive USF high cost or low income support.

STC's competitive expansion area includes the areas surrounding its ILEC service area, consistent with Wis. Stat. §196.50(2)(g).[5] In its competitive expansion service area, STC provides local voice services, long distance voice services through resale arrangements with other carriers, and Internet service. STC is not an ETC in its competitive expansion service area and does not receive any USF support in its competitive expansion service area. STC's competitive expansion service area is documented in the attached Exhibit C as the turquoise colored narrow transport areas to the west, south, and east of STC's ILEC service area, as well as in the area to the north of the ILEC service area within the turquoise boundary, excepting the donut hole served by Brightspeed.

---

[3] Prior to its election of E-ACAM, STC received Connect America Fund Broadband Loop Support ("CAF-BLS"). While NECA disbursement statements show that STC has been receiving CAF-BLS, this is a result of the lag in USF true-ups and payments, such that prior CAF-BLS support will be paid until all true-ups have been completed, which STC expects to occur this summer. The CAF-BLS true up amount for May 2026 was $3,186.

[4] STC did not previously participate in the Emergency Broadband Benefit program ("EBB") or Affordable Connectivity Program ("ACP").

[5] Wis. Stat. § 196.50(2)(g) states that "[t]he authority of every telecommunications utility with a certificate under this subsection is statewide and nonexclusive."

ATTACHMENT 1

STC's wholly owned subsidiary, Siren Communications, Inc. ("SCI"), provides international voice services to STC's ILEC customers and to customers in its competitive expansion service area.

Neither STC nor SCI participated in or has been awarded any funding pursuant to the Broadband Equity Access and Deployment ("BEAD") program.

STC holds a 1/31 membership interest and one equity share with full governance and voting rights in Communication Management Group, LLC ("CMG"), which is a parent company for several wholly-owned subsidiaries: Wisconsin Independent Network, LLC, a provider of a statewide-only transport network; Airstream Communications, LLC, an Internet service provider and provider of information technology services; WINMETRO LLC, an operator of an intra-state only fiber network around Madison, WI, and a provider of VoIP systems equipment; and WIN IT SERVICES, LLC, a provider of information technology services. Neither CMG nor any of its subsidiaries provide any Section 214 services and none receive any USF high cost or low income support.

STC also holds one share of Class A voting stock and 171 shares of Class B non-voting stock in Wisconsin Independent Telecommunications System, Inc. d/b/a Access Wisconsin ("WITS"), an entity that facilitates statewide-only transport for schools and libraries. WITS does not provide any Section 214 services, but does hold a Filer 499 ID, 821874, related to its schools and libraries services.

Other than STC's wholly owned subsidiary, Siren Communications, Inc., which is described below, STC does not have any other affiliates that provide Section 214 services.

B. Siren Communications, Inc.

Siren Communications, Inc. is a wholly-owned subsidiary of Siren Telephone Company, Inc. SCI provides international services to STC's customers through resale arrangements with other carriers and pursuant to the international Section 214 authorization ITC-214-19990624-00396 held by its parent, STC. These voice services are provided as TDM and VoIP throughout the service area. SCI is not an ETC and does not receive any USF support.

C. Lakeland Communications, Inc.

Lakeland Communications, Inc. is a Wisconsin corporation with headquarters in Milltown, Wisconsin. LCI is a holding company and does not itself provide any communications services and does not receive any USF support. LCI's wholly owned subsidiary, Lakeland Communications Group, LLC d/b/a Lakeland Communications, provides communications services in Wisconsin, as set forth in the description below.

LCI holds a 1/31 membership interest and one equity share with full governance and voting rights in CMG, the parent company for the following wholly-owned subsidiaries, which have been described in Section 1.A. above: Wisconsin Independent Network, LLC, Airstream Communications, LLC, WINMETRO LLC, and WIN IT SERVICES, LLC. As noted previously, neither CMG nor any of its subsidiaries provide any Section 214 services and none receive any USF high cost or low income support. LCI also owns 100% of the equity and voting shares of Milltown Cellcom, LLC ("Milltown Cellcom") and Luck Cellcom, LLC ("Luck Cellcom"). Milltown Cellcom and Luck Cellcom each hold a 7.7922% general partnership interest in Wisconsin RSA No. 1 Limited Partnership ("WI RSA 1"). Milltown Cellcom holds a 0.6493% limited partnership interest in WI RSA 1 and Luck Cellcom holds a 0.6494% limited partnership interest in WI RSA 1. WI RSA 1 provides mobile wireless services in the Rural Service Area under the name Verizon Wireless.

LCI also holds one share of Class A voting stock and 171 shares of Class B non-voting stock in WITS,[6] which is described above in Section 1.A. As noted previously, WITS does not provide any Section 214 services, but does hold a Filer 499 ID, 821874, related to its schools and libraries services.

Other than LCI's wholly owned subsidiary, Lakeland Communications Group, LLC, which is described below, and LCI's interest in WI RSA 1 through its wholly owned subsidiaries Milltown Cellcom and Luck Cellcom, LCI does not have any other affiliates that provide Section 214 services.

D. Lakeland Communications Group, LLC

Lakeland Communications Group, LLC d/b/a Lakeland Communications ("LCG") is a Wisconsin limited liability company and a wholly owned subsidiary of Lakeland Communications, Inc. LCG is an ILEC and provides local voice, long distance voice (including international), and high-speed Internet services to approximately 75% of Polk County, Wisconsin, except the southeast quadrant of the county, which is not served by LCG. LCG also serves a small portion of southwestern Burnett County, Wisconsin. LCG's local and exchange access voice services are provided over the company's facilities based fiber-to-the premises network using VoIP. LCG's local network only includes TDM at interconnection points with legacy carriers and is outside the LCG access network. LCG's ILEC service area is documented on the attached Exhibit C in the area outlined in yellow.

---

[6] Upon closing of the Transaction, STC's one share of Class A voting stock in WITS will be redeemed because LCI, including its subsidiaries, can only hold one Class A voting share in WITS.

ATTACHMENT 1

LCG's competitive expansion service area includes the areas surrounding its ILEC service area, consistent with Wis. Stat. § 196.50(2)(g).[7] In its competitive expansion service area, LCG provides local voice, long distance voice (including international), and Internet service. Except for the competitive expansion service areas in which LCG has been awarded USF funds from the Rural Digital Opportunity Fund ("RDOF") auction, LCG is not an ETC and does not receive USF support. The LCG competitive expansion service area is located within the green boundaries to the north, east, and south of the LCG ILEC service area on the attached Exhibit C. LCG was awarded RDOF support within certain areas that comprise its competitive expansion service area. The RDOF service areas are designated by the royal blue boundaries within the green boundaries of the competitive expansion service area on the attached Exhibit C. LCG is an ETC in the competitive expansion service area where it has been awarded RDOF support.

LCG is an ETC in its ILEC area pursuant to Section 214(e) of the Act and receives USF high cost support through the E-ACAM program in its SAC 330902.[8] LCG was also designated as an ETC pursuant to its award of RDOF funds in SAC 339066. LCG's RDOF SAC 339066 has been merged into LCG's SAC 330902 for operational efficiency.[9]

---

[7] Wis. Stat. § 196.50(2)(g) states that "[t]he authority of every telecommunications utility with a certificate under this subsection is statewide and nonexclusive." LCG does not operate as a CLEC.

[8] LCG exists as the result of a merger between Luck Telephone Company ("Luck") and Milltown Mutual Telephone Company ("Milltown"), effective January 1, 1997. Within the past five years the Luck and Milltown study areas were merged into one study area code under the Luck SAC 330902, which is now the LCG SAC. The Universal Service Administrative Company's ("USAC") high cost disbursement page still displays SAC 330902 under the SAC name for Luck Telephone.

[9] The merger of SAC 339066 into SAC 330902 is not currently reflected in the USAC high cost disbursement page.

ATTACHMENT 1

LCG participates in the Lifeline program where it is an ETC in its ILEC service area and in its competitive expansion service area where designated for RDOF support.[10] LCG does not have any affiliates that receive USF high cost or low income support.

LCG is a sub-awardee in the state of Wisconsin for the BEAD program, pursuant to two agreements in which LCG entered. The locations of these BEAD awards ("LCG BEAD Locations") are exhibited in Exhibit D.[11] None of the LCG BEAD Locations overlap with LCG's current ILEC / E-ACAM service area or its RDOF high cost support service areas. Further, none of the LCG BEAD Locations overlap with STC's ILEC / E-ACAM service area or any competitive expansion area served by STC.

LCG's long distance and international voice services are provided in its ILEC and competitive expansion service areas through resale arrangements with other carriers. These voice services are provided as VoIP throughout the service area.

LCG owns a one-third membership interest in Wisconsin Telcom Switching LLC ("WTS"). WTS does not provide any Section 214 services. The sole purpose of WTS is to own and operate a switch for the benefit of its members. The other members of WTS are Amery Telcom, Inc. and Farmers Independent Telephone Company, Inc. d/b/a Grantsburg Telecom, which each own a one-third membership interest.

Until recently, LCG held a 100% equity and voting interest in Lakeland Broadband, but since there have never been any operations in this entity it was dissolved on July 30, 2026.

---

[10] LCG previously participated in EBB and ACP. Should those programs be re-activated, LCG will resume provision of EBB and ACP services.

[11] Exhibit D provides a legend for the LCG and STC service areas, an overview map showing the LCG BEAD Locations, and zoomed in portions of the map for greater detail of the LCG BEAD Locations. In some instances the LCG BEAD Locations may appear to touch the border of an area where LCG provides services pursuant to RDOF, but all of those locations are outside of the RDOF service area.

II. DESCRIPTION OF THE TRANSACTION

The Applicants have entered into an Agreement, dated as of January 23, 2026, pursuant to which LCI will acquire all of the stock of STC. LCI will then own 100% of the stock of STC and indirectly will own 100% of the stock of SCI. STC will become a direct wholly owned subsidiary of LCI and SCI will become an indirect wholly owned subsidiary of LCI. The Transaction will not result in a change to the terms and conditions of service pursuant to which STC and SCI provide service to their customers.[12]

Following the closing of the Transaction, STC will remain as an ETC in the STC service area and STC will continue to fulfill its responsibilities as an ETC in its SAC 330949, including its obligations associated with E-ACAM USF.[13] Similarly, LCG will continue to fulfill its responsibilities as an ETC for its ILEC and RDOF service areas in its existing SAC 330902, meeting its established USF E-ACAM and RDOF obligations.[14] There will be no modification

[12] The Transaction does not raise any slamming concerns or necessitate compliance with procedures to notify customers prior to a carrier-to-carrier sale or transfer of subscribers as it does not involve a change in any customer's existing service provider. The customers of STC and SCI will remain with STC and SCI immediately following the closing of the Transaction and will continue to receive services pursuant to STC and SCI's authorizations for some period of time. Accordingly, there are no changes in customers' preferred carrier, and no further filings or authorizations are required under the FCC's carrier selection rules, 47 C.F.R. §64.1120 et seq., or under analogous state rules, upon the closing of the Transaction. STC and SCI's services will eventually be offered under the d/b/a Lakeland Communications as part of a new name acclimation period, for which LCI will provide customer notice. Similarly, LCI will provide advance customer notice of any change in the terms and conditions of service and any price increases, if and when appropriate.

[13] As STC's parent company, LCI will assume ultimate responsibility for ensuring that STC satisfies all managerial, technical, and financial qualifications required for STC to continue operating as the ETC for the STC service area, as well as for ensuring that STC complies with all of its USF E-ACAM obligations.

[14] As LCG's parent company, LCI will assume ultimate responsibility for ensuring that LCG satisfies all managerial, technical, and financial qualifications required for LCG to continue operating as the ETC for the LCG service area, as well as for ensuring that LCG complies with all of its USF E-ACAM and RDOF obligations.

to the service area boundary of STC's SAC 330949. The Applicants do not propose to merge, consolidate, or otherwise modify their study areas.

III. PUBLIC INTEREST STATEMENT

Approval of the Transaction will serve the public interest, convenience, and necessity. A grant will permit the continued, uninterrupted provision of high-quality service to customers. The consummation of the Transaction will not result in an interruption, reduction, loss or impairment of services to any subscriber, and the Applicants are not aware of any harm to customers or to the market that will result from the consummation of the Transaction. The ultimate goal of the Transaction is delivering long-term benefits to all customers through improved network performance, expanded service offerings via an integrated team, and continued network innovation.

The Transaction will allow LCI: (1) to increase operational and cost efficiencies by ultimately integrating the acquired assets and staff, while improving service quality for all customers; (2) to leverage the combined capabilities and experience of both STC and LCG to continue extending service offerings into new and underserved markets; (3) to increase the redundancy and capacity of the LCG and STC networks by adding geographically diverse uplink paths to the Internet to improve reliability, capacity, and performance of both LCG and STC's Internet services; (4) to upgrade existing fiber network and infrastructure to support XGS-PON standards to provide speeds up to 10GB, using a network design prepared for future expansion; and (5) to expand VoIP offering to local businesses to include SIP trunks and Hosted PBX products and services. In sum, the Transaction will facilitate the continued investment in community-based networks for the provision of high-speed broadband services in Wisconsin, support continued investment in core operations, and improve and enhance service offerings, benefitting STC, SCI, and LCG customers.

Because LCG and STC only receive fixed model-based USF support, the Transaction does not implicate cost-shifting or other public interest harms that may occur in mixed support transactions. The Transaction will not result in managerial, technological, or financial changes that would compromise LCG's ability to meet its service obligations in its study area for SAC 330902 or STC's ability to meet its service obligations in its study area for SAC 330949. The Transaction will not alter either LCG's public service obligations as an ETC or STC's public service obligations as an ETC, including their commitments to deploy and maintain high speed broadband and voice services within their study areas.

In support of this Joint Application, the Applicants submit the following information in Sections IV, V, and VI, pursuant to Sections 63.04, 63.18, and 63.24(b) of the Commission's rules, questions in the FCC Form 214 TOC, and other Commission requirements.

IV. INFORMATION REQUIRED FOR BOTH DOMESTIC SECTION 214 AND INTERNATIONAL SECTION 214 ASSIGNMENTS

Sections 63.04(a)(1) and 63.18(a) – The name, address, and telephone number of each applicant.

Transferor
Siren Telephone Company, Inc.
7723 W. Main Street
PO Box 426
Siren, WI 54872
Phone: (715) 349-2224

Transferee
Lakeland Communications, Inc.
825 Innovation Avenue
PO Box 40
Milltown, WI 54858
Phone: (715) 825-2171

ATTACHMENT 1

Sections 63.04(a)(2) and 63.18(b) – The government, state, or territory under the laws of which each corporate applicant is organized.

Transferor and Transferee are both Wisconsin corporations.

Section 63.04(a)(3) and Answer to Question 10 (Section 63.18(c)) – The name, title, post office address, and telephone number of the officer or contact point, such as legal counsel, to whom correspondence concerning the application is to be address.

<u>Transferor</u>
Sidney M. Sherstad
General Manager
Siren Telephone Company
7723 W. Main Street
PO Box 426
Siren, WI 54872
Phone: (715) 349-2224
Email: s.sherstad@sirentel.com

<u>Legal Counsel to Transferor</u>
Donald L. Herman, Jr.
Robin E. Tuttle
Herman & Whiteaker, LLC
6903 Rockledge Drive, Suite 750
Bethesda, MD 20817
Phone: (202) 600-7273 and (202) 827-0667
Email: dee@hermanwhiteaker.com and rtuttle@hermanwhiteaker.com

<u>Transferee</u>
Alec Mortel
General Manager
Lakeland Communications, Inc.
825 Innovation Avenue,
PO Box 40
Milltown, WI 54858
Phone: 715-825-2171
alecm@lakelandteam.com

<u>Legal Counsel to Transferee</u>
Donald L. Herman, Jr.
Robin E. Tuttle
Herman & Whiteaker, LLC
6903 Rockledge Drive, Suite 750
Bethesda, MD 20817
Phone: (202) 600-7273 and (202) 827-0667
Email: dee@hermanwhiteaker.com and rtuttle@hermanwhiteaker.com

ATTACHMENT 1

Section 63.04(a)(4) and Answer to Question 11 (Section 63.18(h)

Section 63.04(a)(4)(i) and Section 63.18(h)(1) – The name, address, citizenship, and principal business of any person or entity that directly or indirectly owns ten percent or more of the equity interests and/or voting interests, or a controlling interest, of the applicant, and the percentage of equity and/or voting interest owned by each of those entities (to the nearest one percent).

The following individuals and entities directly own ten percent or more of the equity and voting interests of STC. No other individual or entity, either directly or indirectly, owns ten percent or more of the equity and/or voting interests or has a controlling interest in STC.

Name	Address	Citizenship	Ownership Interest
Carlstrom Revocable Trust, Norma Carlstrom, Trustee	222 2nd Street SE, #1401, Minneapolis, MN 55414	U.S.	29% voting and equity interest
Rebecca J. Marten	2055 23 3/16 Avenue, Rice Lake, WI 54868	U.S.	40% voting and equity interest

The members of the STC Board of Directors are listed below.

Name	Title	Address	Citizenship	Principal Business
Sidney M. Sherstad	President	7723 W. Main Street, PO Box 426, Siren, WI 54872	U.S.	Telecommunications
Rebecca J. Marten	Vice President	7723 W. Main Street, PO Box 426, Siren, WI 54872	U.S.	Telecommunications
Karen C. Sherstad	Secretary / Treasurer	7723 W. Main Street, PO Box 426, Siren, WI 54872	U.S.	Telecommunications
Norma Carlstrom	Director	222 2nd Street SE, #1401, Minneapolis, MN 55414	U.S.	Telecommunications
Jane Wagner	Director	7723 W. Main Street, PO Box 426, Siren, WI 54872	U.S.	Telecommunications
Len A. Carlstrom	Director	7723 W. Main Street, PO Box 426, Siren, WI 54872	U.S.	Telecommunications

The ownership of LCI is widely held with just under 400 shareholders as of July 1, 2026. No individual or entity, either directly or indirectly, owns ten percent or more of the equity and/or voting interests, or has a controlling interest in LCI. The members of the LCI Board of Directors are listed below.

ATTACHMENT 1

Name	Title	Address	Citizenship	Principal Business
John K. Klatt	President	110 Jenson Boulevard, Luck, WI 54853	U.S.	Telecommunications
Henry O. Studtmann, Jr.	Vice President	424 2nd Avenue NW, Milltown, WI 54858	U.S.	Telecommunications
Bruce Hanson	Secretary	367 132nd Avenue, Hudson, WI 54082	U.S.	Telecommunications
Daniel J. Flaherty	Treasurer	209 W. Main Street, Balsam Lake, WI 54810	U.S.	Telecommunications
Cathy Masters	Director	1980 160th Street, Centuria, WI 54824	U.S.	Telecommunications

Section 63.04(a)(4)(i) and Section 63.18(h)(1) – Ownership diagram of applicant's vertical ownership structure, pre-transaction and post-transaction ownership of the authorization holder.

The pre-transaction and post-transaction ownership diagrams for STC and LCI are provided in Exhibit A.

Section 63.04(a)(6) and Answer to Question 13 – A description of the transaction.

The Applicants provide a description of the Transaction in Section II of this Joint Application.

V. ADDITIONAL INFORMATION REQUIRED FOR ASSIGNMENT OF INTERNATIONAL SECTION 214 AUTHORIZATION AND INTERNATIONAL CUSTOMERS

Section 63.18(d) – A statement as to whether the applicant has previously received authority under Section 214 of the Act.

Transferor holds international Section 214 authorization ITC-214-19990624-00396. File ITC-214-19990624-00396 provides authorization for global resale service pursuant to Section 63.18(e)(2) of the Commission's rules. Transferor holds no other international Section 214 authorization.

Transferee does not hold an international Section 214 authorization. However, Transferee's wholly owned subsidiary, LCG, holds international Section 214 authorization ITC-214-20000717-00412. File ITC-214-20000717-00412 provides authorization for global or limited global resale service pursuant to Section 63.18(e)(2) of the Commission's rules. LCG holds no other international Section 214 authorization.

Section 63.18(h)(3) – Interlocking directorates with a foreign carrier.

Neither Transferee, nor its wholly owned subsidiary LCG, has any interlocking directorates with a foreign carrier.

Section 63.18(i) – Foreign carrier and foreign carrier affiliation.

Transferee certifies that neither it nor its wholly owned subsidiary LCG is a foreign carrier and that neither is not affiliated with a foreign carrier.

Section 63.18(j) – Service to destination country.

Transferee certifies that neither it nor its wholly owned subsidiary LCG seeks to provide international telecommunications services to any destination country for any of the scenarios set forth in Section 63.18(j)(1)-(4).

Section 63.18(k)

Not applicable.

Section 63.18(m) – Regulatory classification under Section 63.10.

Neither Transferee nor its wholly owned subsidiary LCG has any affiliation with, and neither is, a foreign carrier in any country and therefore presumptively is considered to be non-dominant for the provision of international telecommunications services.

Section 63.18(n)

Not applicable.

ATTACHMENT 1

Section 63.18(o) – Denial of federal benefits.

Transferor, as a party to this Application, certifies pursuant to §§1.2001 through 1.2003 that it is not subject to the denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988. *See* 21 U.S.C. 853.

Transferee, as a party to this Application, certifies pursuant to §§1.2001 through 1.2003 that it is not subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988. *See* 21 U.S.C. 853.

Section 63.18(p)

Not applicable.

Section 63.18(q) – Required certifications.

Transferee's certifications under Section 63.18(q) of the Commission's rules are attached as Exhibit B.

Section 63.18(r) – Statement of how the application qualifies for streamlined processing.

The transfer of control of the international 214 authorization as set forth in this Joint Application qualifies for streamlined processing under Section 63.12(c) because neither LCI nor its wholly owned subsidiary LCG is affiliated with any foreign or dominant U.S. carrier whose international switched or private line services LCI or LCG seeks authority to resell, and neither LCI nor LCG provides and neither requests 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. In addition, no individual or entity holds a ten percent or greater direct or indirect equity or voting interest, or a controlling interest, in the Transferee. Additionally, there are no ten percent holders of Transferee that are not U.S. citizens.

ATTACHMENT 1

VI. ADDITIONAL INFORMATION REQUIRED FOR ASSIGNMENT OF ASSETS AND CUSTOMERS FOR DOMESTIC SECTION 214 SERVICE

Section 63.04(a)(6) – A description of the transaction.

The Applicants provide a description of the Transaction in Section II of this Joint Application.

Section 63.04(a)(7) – Geographic areas served and services provided.

The Applicants describe the geographic areas they serve and the services they provide in Section I of this Joint Application.

Section 63.04(a)(8) – A statement regarding presumptive streamlined treatment.

The Applicants do not qualify for presumptive streamlined processing relative to the transfer of control of the domestic Section 214 authorization. However, the Applicants request expeditious approval of the domestic Section 214 assignment, which will serve the public interest through greater operational efficiencies, continued investments in broadband networks, and continuity of services to consumers without interruption. The Transaction poses no harm to consumers and raises no competitive issues. The Transaction poses no public interest harm as there is no overlap or adjacency in the STC and LCG service areas. STC does not offer any residential or business services in LCG's ILEC study area boundary, where LCG provides services pursuant to RDOF support, or where LCG provides services pursuant to BEAD support. Similarly, LCG does not offer any residential or business services in STC's ILEC study area boundary. STC and LCI's wholly owned subsidiary LCG have interconnected their telephone networks at a meet point in Frederic, Wisconsin, in Polk County, but the two networks do not overlap.[15] A map demonstrating the Applicants' service areas is attached hereto as Exhibit C. Further, there are no cost-shifting implications as this is not a mixed support transaction.

STC elected to receive E-ACAM support for 2,568 locations[16] and currently receives $1,007,722 annually during the initial five-year fixed period. Future support amounts beyond the initial five-year fixed period are set forth in Public Notice, *Wireline Competition Bureau Announces Final Eligible Locations File and Support Amount for Enhanced Alternative Connect America Model Mechanism*, DA 25-1107 (rel. Dec. 30, 2025) ("E-ACAM PN").

LCI's wholly owned subsidiary LCG elected to receive E-ACAM for 5,448 locations and currently receives $5,015,088 during the initial five-year fixed period.[17] Future support amounts beyond the initial five-year fixed period are set forth in the E-ACAM PN. LCG also receives RDOF support, with total support amounting to $408,952.00 ($40,895.20 annually) for 550 supported locations.

Section 63.04(a)(9) – Identification of other related Commission applications.

There are no applications related to this Joint Application and the Applicants will not be submitting any applications related to this Joint Application.

Section 63.04(a)(10) – Statement regarding requests for special consideration.

The Applicants do not request special consideration because no party to the Transaction is facing imminent business failure.

Section 63.04(a)(11) – Identification of any separately filed waiver requests being sought in conjunction with the transaction.

The Applicants will not seek a waiver in conjunction with this Transaction.

---

[15] There are two Lumen Technologies ILEC exchanges separating the STC and LCG ILEC study area boundaries.
[16] As required, STC will serve additional locations as they are added to the area.
[17] As required, LCG will serve additional locations as they are added to the area.

ATTACHMENT 1

Section 63.04(a)(12) – A statement showing how grant of the application will serve the public interest, convenience, and necessity, including showing of the effect of the proposed transaction on competition in domestic markets.

The Applicants provide a statement in Section III of this Joint Application showing how the grant of this Joint Application will serve the public interest, convenience, and necessity, as well as a showing related to competition in domestic markets.

VII. CONCLUSION

Based on the foregoing, the Applicants respectfully request that the Commission expeditiously grant this Joint Application and consent to the transfer of control of the domestic and international Section 214 authorizations of STC to LCI as requested herein.

Respectfully submitted,

Donald L. Herman, Jr.
Robin E. Tuttle
HERMAN & WHITEAKER, LLC
6903 Rockledge Drive
Suite 750
Bethesda, MD 20817
dee@hermanwhiteaker.com
202-600-7273
rtuttle@hermanwhiteaker.com
202-827-0667

Counsel for Siren Telephone Company, Inc. and Lakeland Communications, Inc.

Dated: August 3, 2026

EXHIBIT A

Pre-Transaction Ownership and Organization Information
Siren Telephone Company, Inc. and Siren Communications, Inc.

The diagram below identifies the current ownership and organization structure for Siren Telephone Company, Inc. and Siren Communications, Inc.

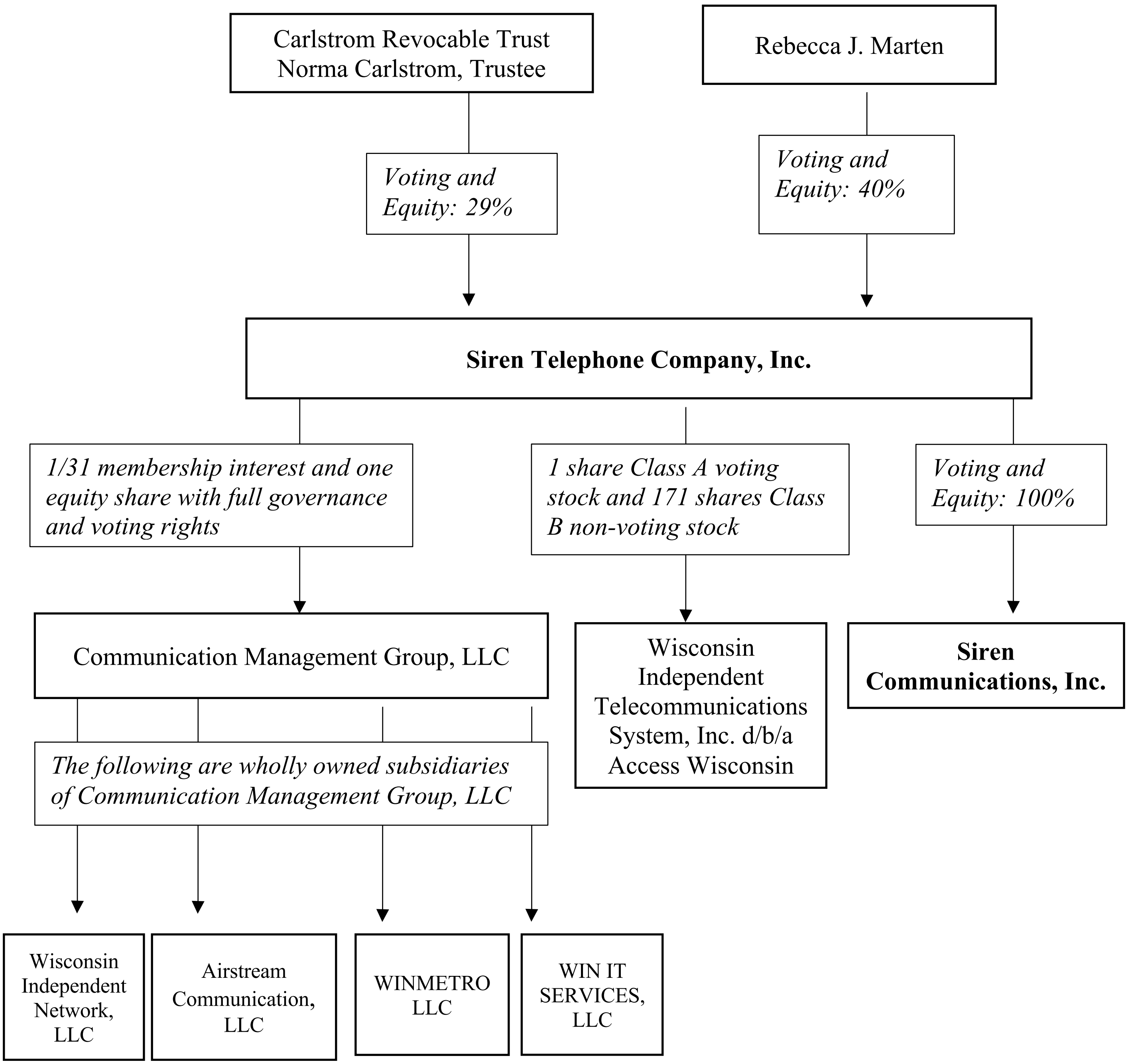


EXHIBIT A (continued)

Pre-Transaction Ownership and Organization Information
Lakeland Communications, Inc.

Lakeland Communications, Inc. is a widely held company that has no parent company and no individual or entity holding a 10% or more interest. The diagram below identifies the current, pre-transaction ownership and organization structure for Lakeland Communications, Inc., with its wholly owned subsidiary, Lakeland Communications Group, LLC.

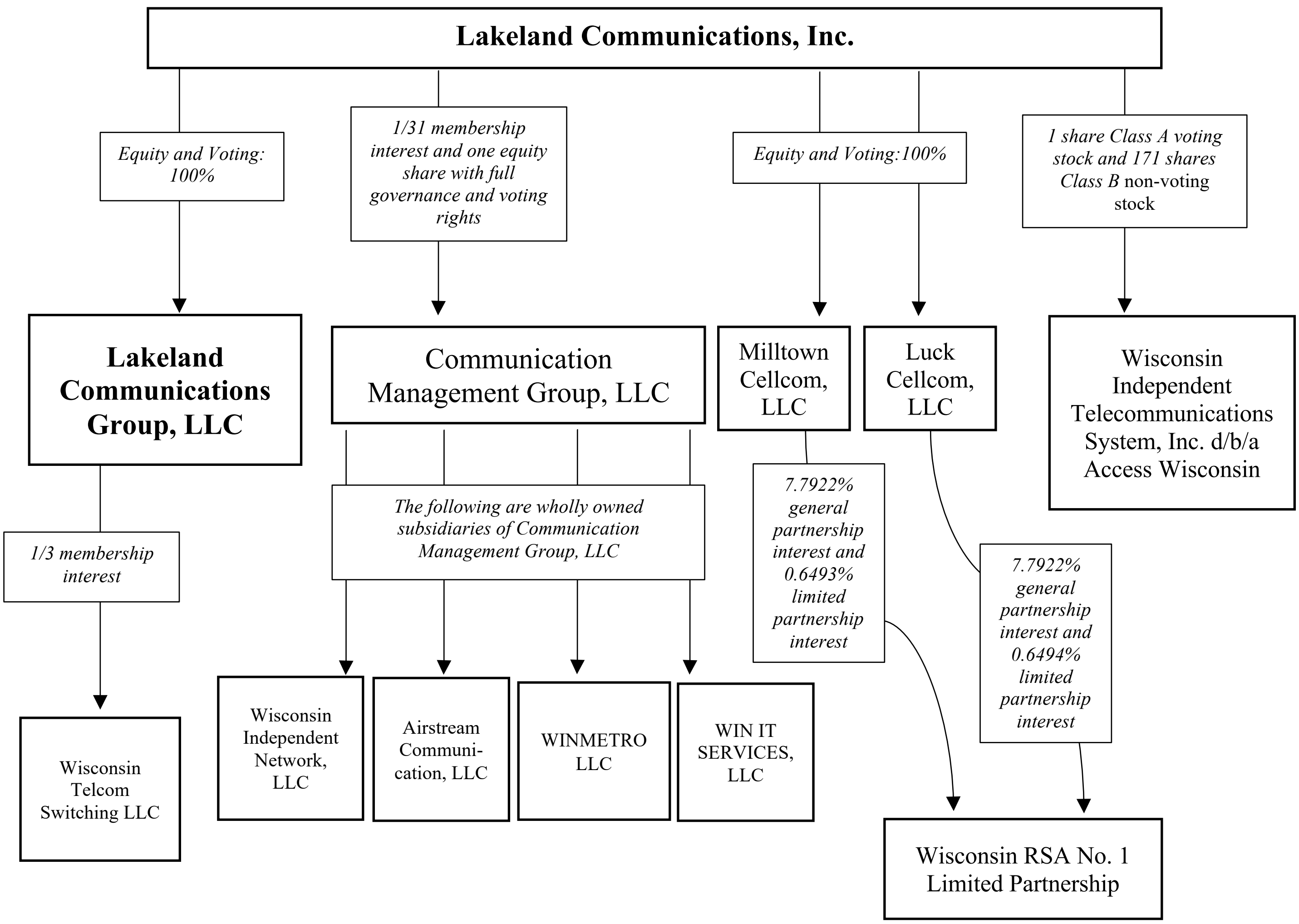
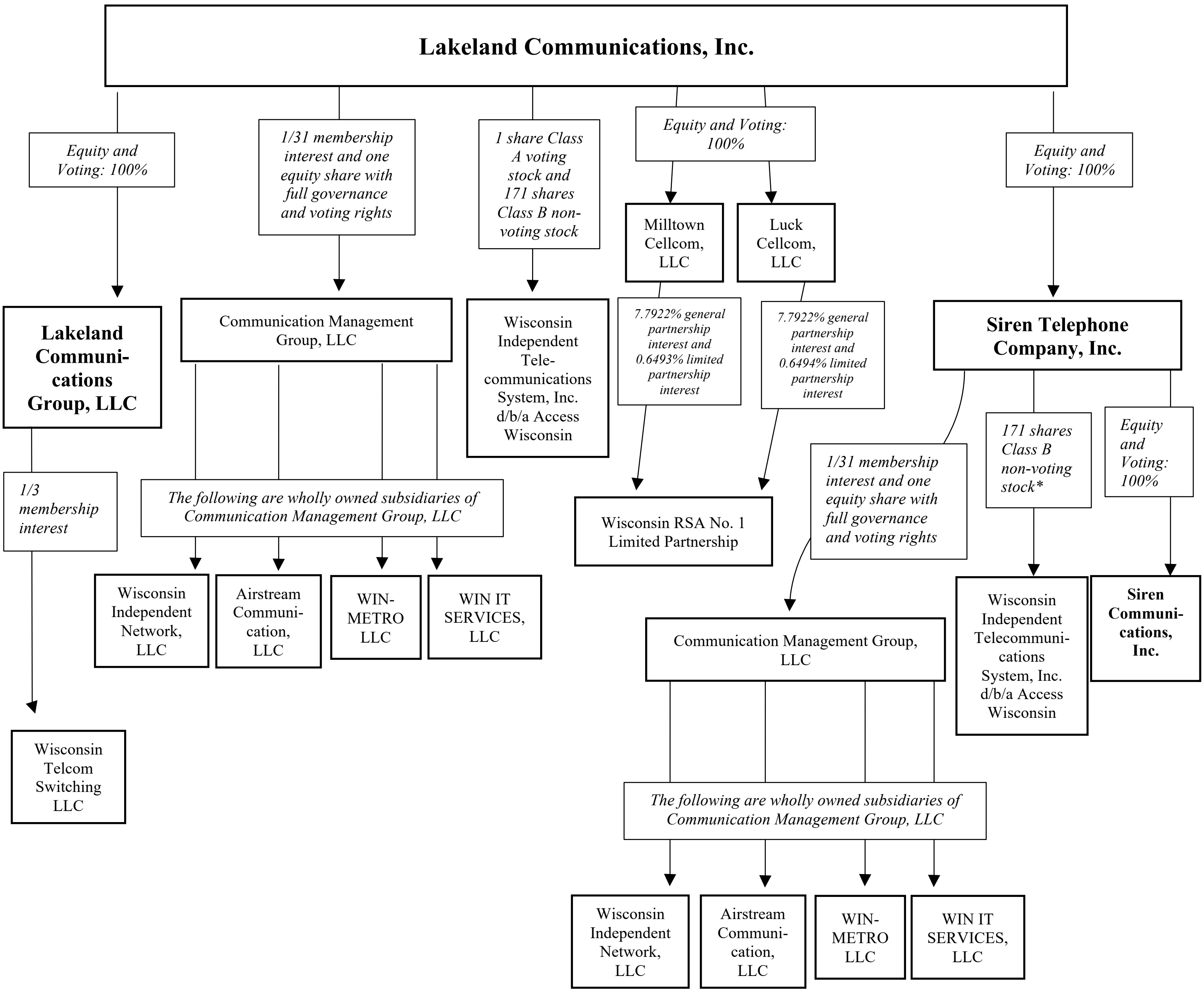


EXHIBIT A (continued)

Post-Transaction Ownership and Organization Information
Lakeland Communications, Inc.

Lakeland Communications, Inc. is a widely held company that has no parent company and no individual or entity holding a 10% or more interest. The diagram below identifies the post-transaction ownership and organization structure for Lakeland Communications, Inc., with Lakeland Communications Group, LLC and Siren Telephone Company, Inc. as direct wholly owned subsidiaries and with Siren Communications, Inc. as an indirect wholly owned subsidiary.



* STC's Class B shares of Wisconsin Independent Telecommunications System, Inc. d/b/a Access Wisconsin are subject to a right of first refusal, and as such, it is possible these shares will not be owned by STC post-closing.

EXHIBIT B
Certifications Required Under 47 C.F.R. §63.18(q)

Lakeland Communications, Inc. hereby certifies that:

1. It will comply with all applicable Communications Assistance for Law Enforcement Act ("CALEA") requirements and related rules and regulations, including any and all FCC orders and opinions governing the application of CALEA, pursuant to Communications Assistance for Law Enforcement Act and the Commission's rules and regulations in 47 C.F.R. 1.20000 et seq.;

2. It will make communications to, from, or within the United States, as well as records thereof, available in a form and location that permits them to be subject to a valid and lawful request or legal process in accordance with U.S. law, including but not limited to: (1) the Wiretap Act, 18 U.S.C. § 2510 et seq.; (2) the Stored Communications Act, 18 U.S.C. § 2701 et seq.; (3) the Pen Register and Trap and Trace Statute, 18 U.S.C. § 3121 et seq.; and (4) other court orders, subpoenas or other legal process;

3. It will designate a point of contact who is located in the United States and is a U.S. citizen or lawful U.S. permanent resident, for the execution of lawful requests and as an agent for legal service of process;

4. It is responsible for the continuing accuracy and completeness of all information submitted, whether at the time of submission of the application or subsequently in response to either the Commission's request [or the Committee's request, if the Joint Application is referred to the Committee for review], as required in section 1.65(a) of this chapter, and agree to inform the Commission [and the Committee, if the Joint Application is referred to the Committee for review] of any substantial and significant changes while an application is pending;

5. After the Joint Application is no longer pending for purposes of section 1.65 of the rules, it will notify the Commission [and the Committee, if the Joint Application is referred to the Committee for review] of any changes in the authorization holder or licensee information and/or contact information promptly, and in any event within thirty (30) days; and

6. It understands that if the Transferee fails to fulfill any of the conditions and obligations set forth in the certifications set out in paragraph (q) of this section or in the grant of an application or authorization and/or that if the information provided to the United States Government is materially false, fictitious, or fraudulent, applicant and authorization holder may be subject to all remedies available to the United States Government, including but not limited to revocation and/or termination of the Commission's authorization or license, and criminal and civil penalties, including penalties under 18 U.S.C. § 1001.

EXHIBIT B (continued)
Certifications Required Under 47 C.F.R. §63.18(q)

Post-closing Agent for Applicant for Legal Service of Process (47 CFR § 1.47(h))

- **Contact for execution of lawful requests**

  Name: Alec Mortel, General Manager
  Company: Lakeland Communications, Inc.
  Address: 825 Innovation Avenue, PO Box 40, Milltown, WI 54858
  Phone No: 715-825-2171
  After Hours: 715-825-2171
  Fax No.: 715-825-4299
  Email: alecm@lakelandteam.com

- **Agent for legal service of process**

  Name: Donald L. Herman, Jr., Herman & Whiteaker, LLC
  Address: 1345 30th Street, NW
  Phone No.: 202-600-7273
  Fax No.: 202-706-6056
  Email: dcagent@hermanwhiteaker.com

EXHIBIT C
Map Demonstrating Applicants' Service Areas

The existing service area for Lakeland Communications Group, LLC SAC 330902, which is a wholly owned subsidiary of Lakeland Communications, Inc., is identified on the map below as described in the Joint Application.

The existing service area for Siren Telephone Company, Inc. SAC 330949 is identified on the map below as described in the Joint Application.

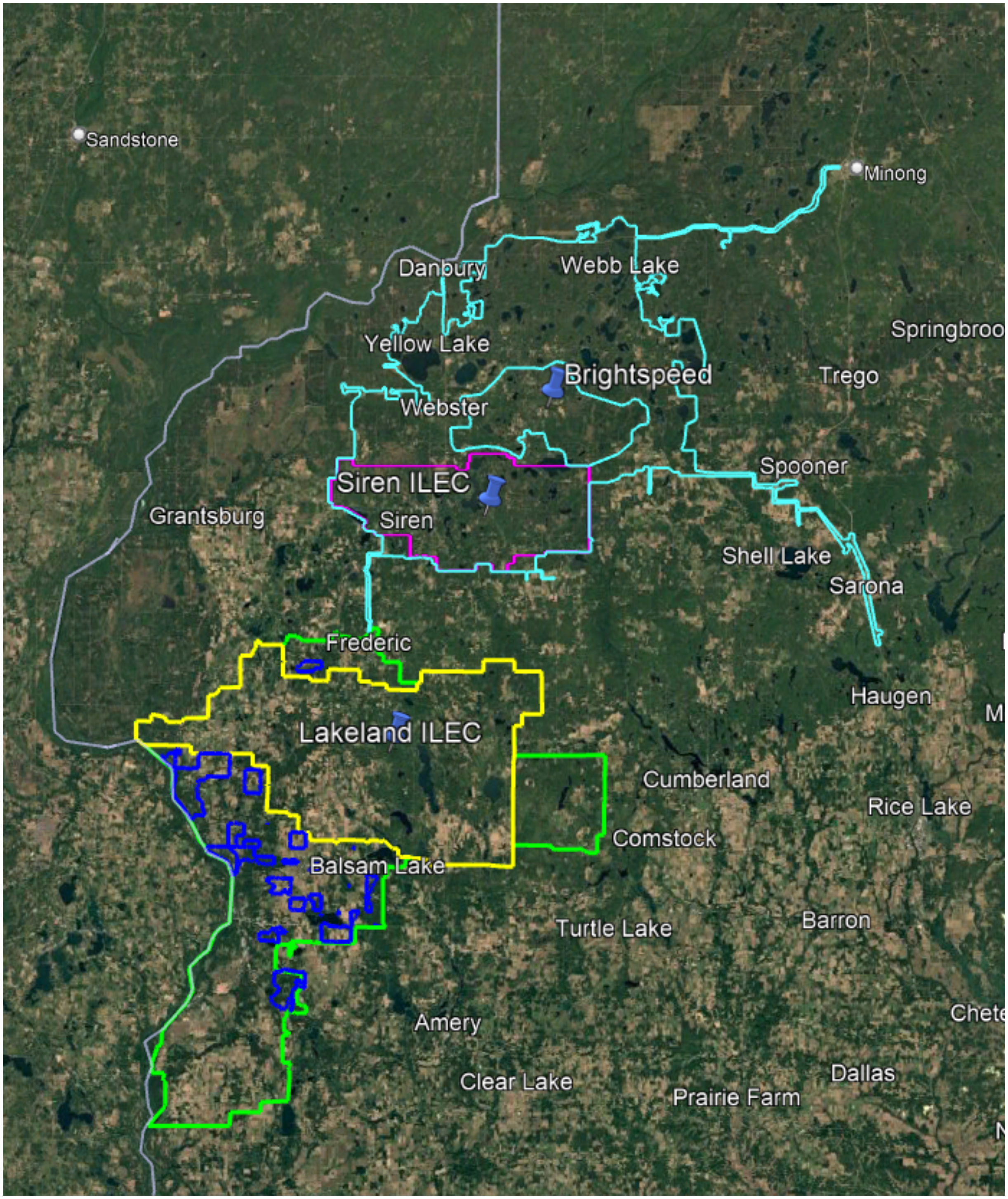


Exhibit D – Map Demonstrating LCG's BEAD Locations

REFERENCE

Lakeland Communications Group

Yellow Polygon Boundary – LCG ILEC

Yellow Dots – LCG BEAD Awarded Locations

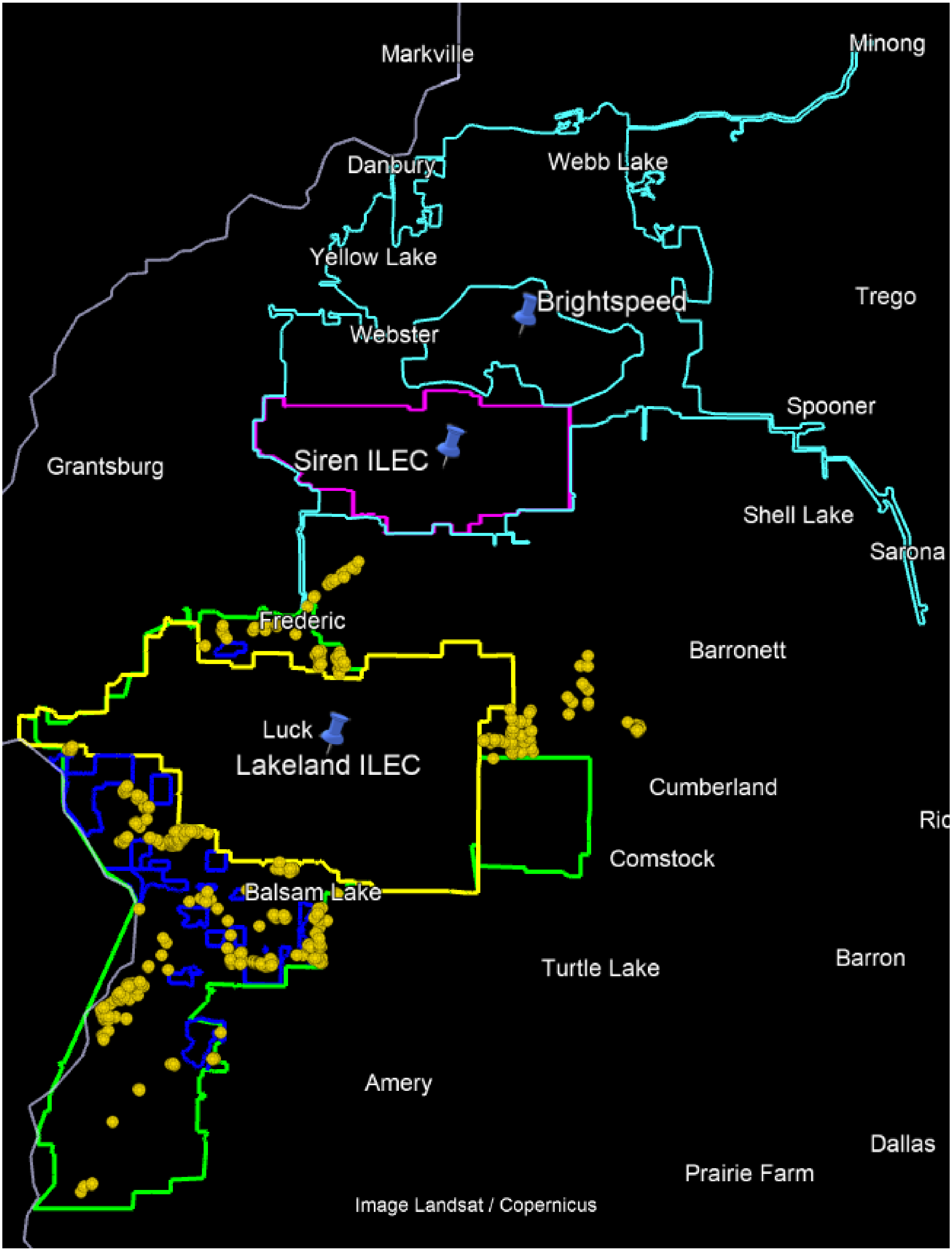
Green Polygon Boundary – "LCG Competitive Exchange Boundary"

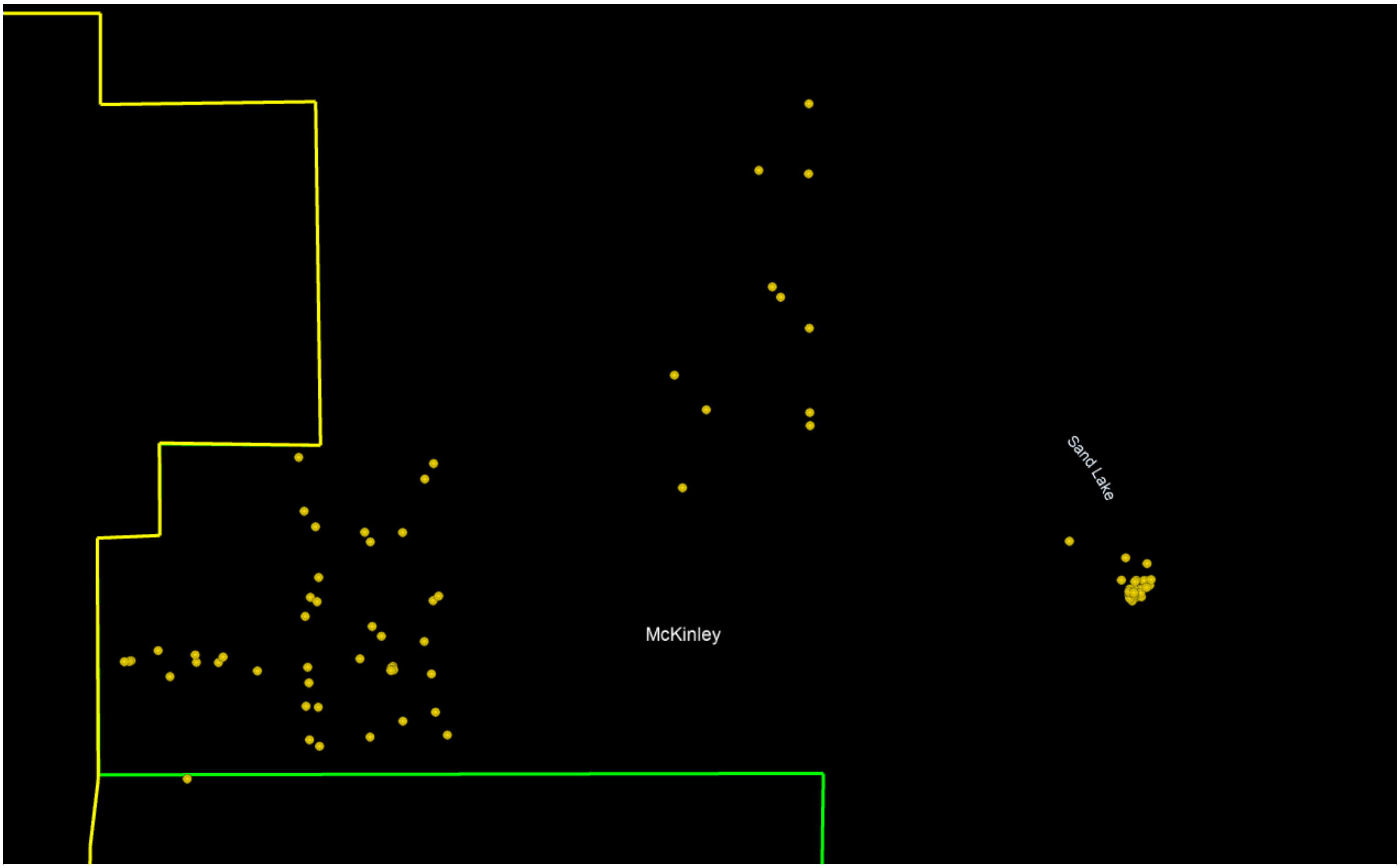
Blue Polygons – LCG RDOF Census Block Groups

Siren Telephone Company

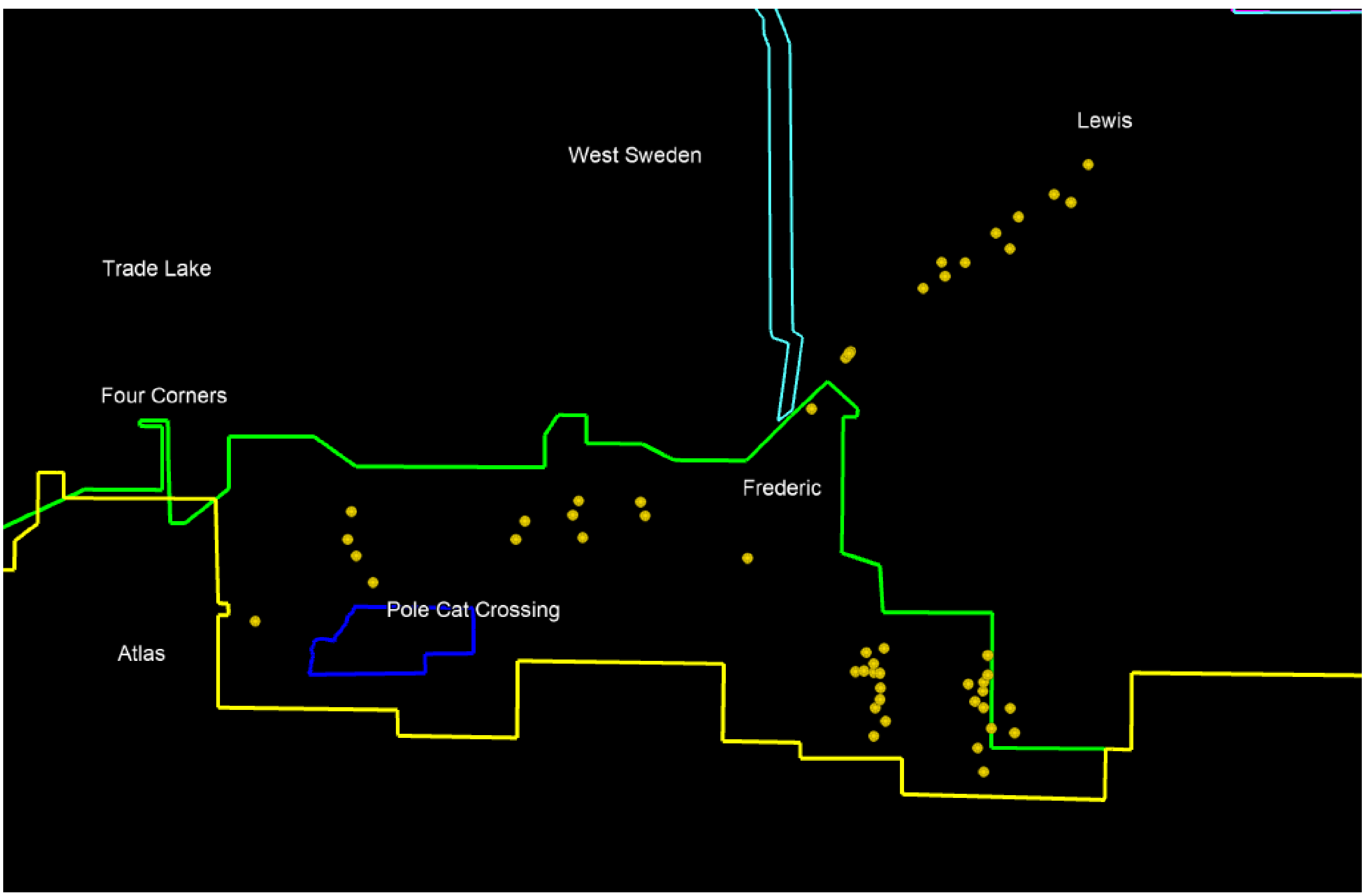
Pink Polygon Boundary – STC ILEC

Teal Boundary – "STC Competitive Exchange Boundary"

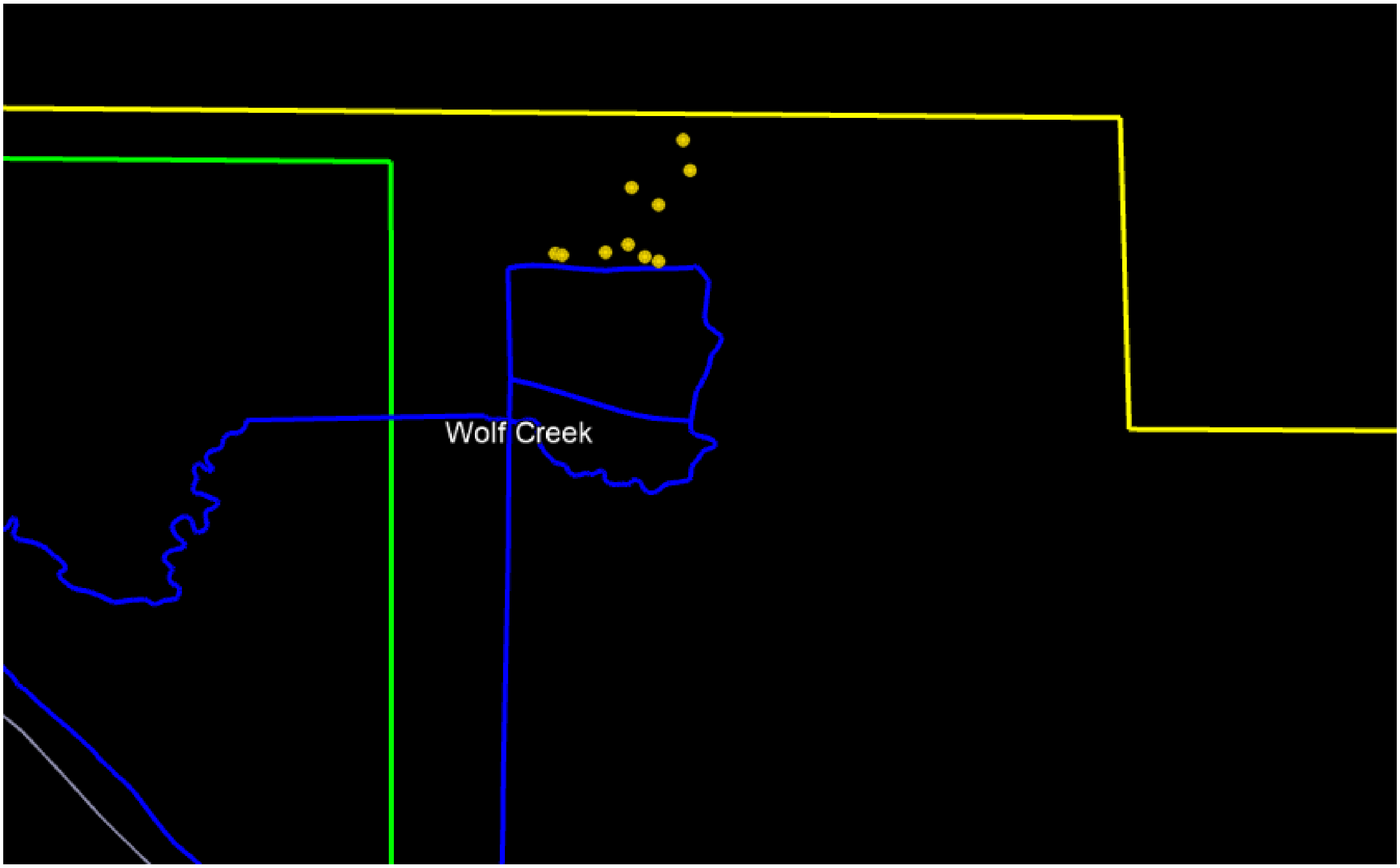

Markville
Minong
Danbury
Webb Lake
Yellow Lake
Brightspeed
Trego
Webster
Spooner
Grantsburg
Siren ILEC
Shell Lake
Sarona
Frederic
Barronett
Luck
Lakeland ILEC
Cumberland
Comstock
Balsam Lake
Turtle Lake
Barron
Amery
Dallas
Prairie Farm
Image Landsat / Copernicus

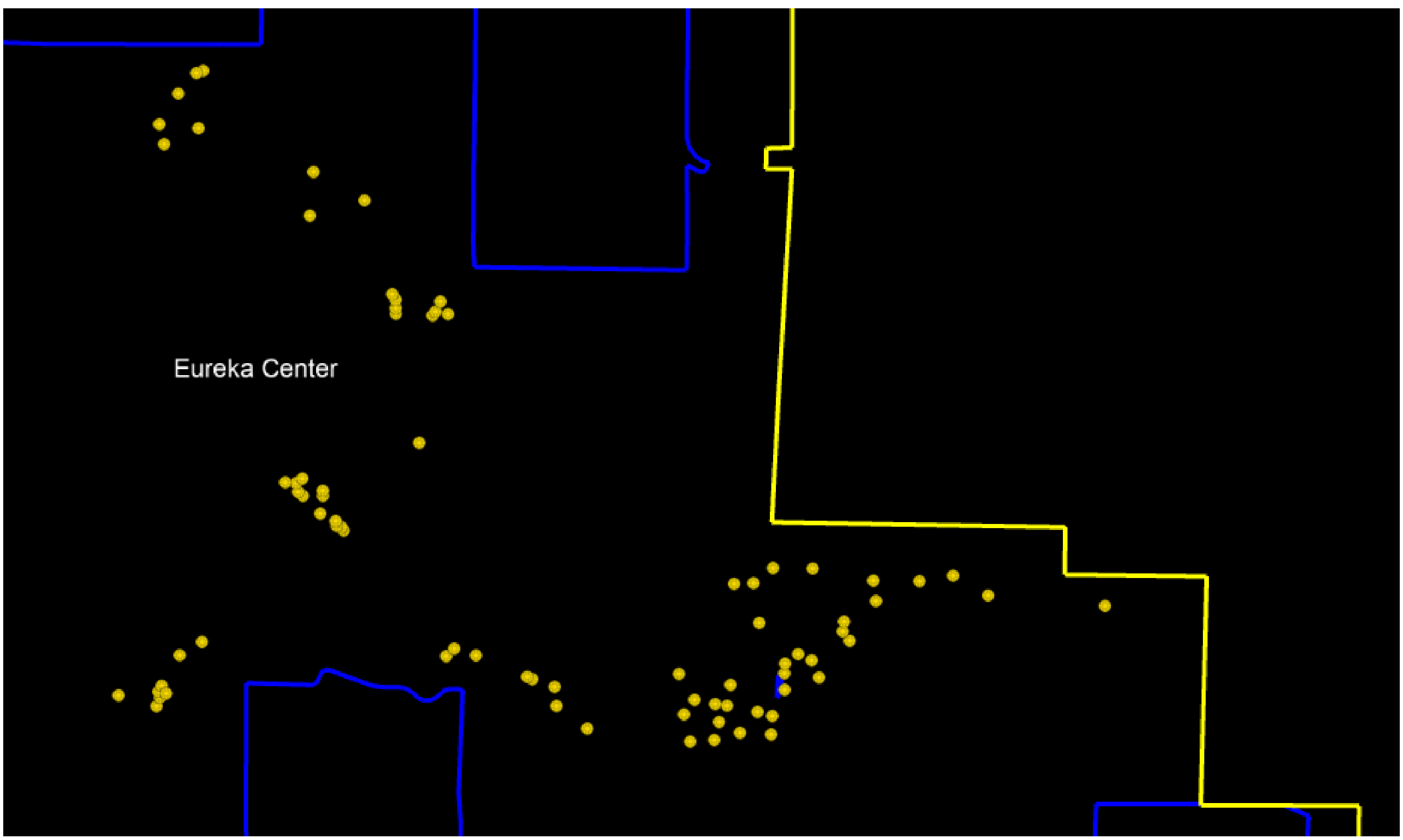


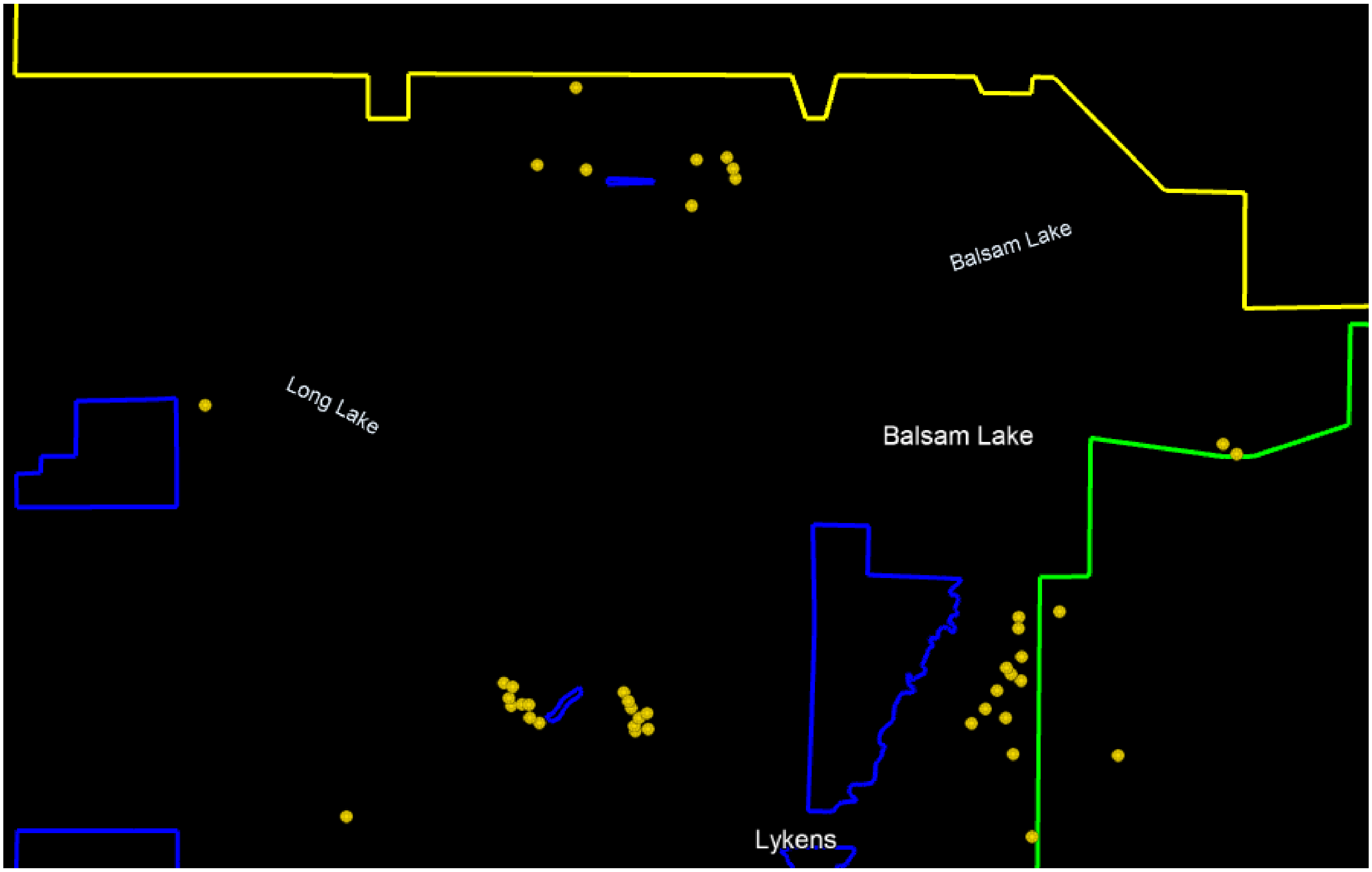
Sand Lake
McKinley

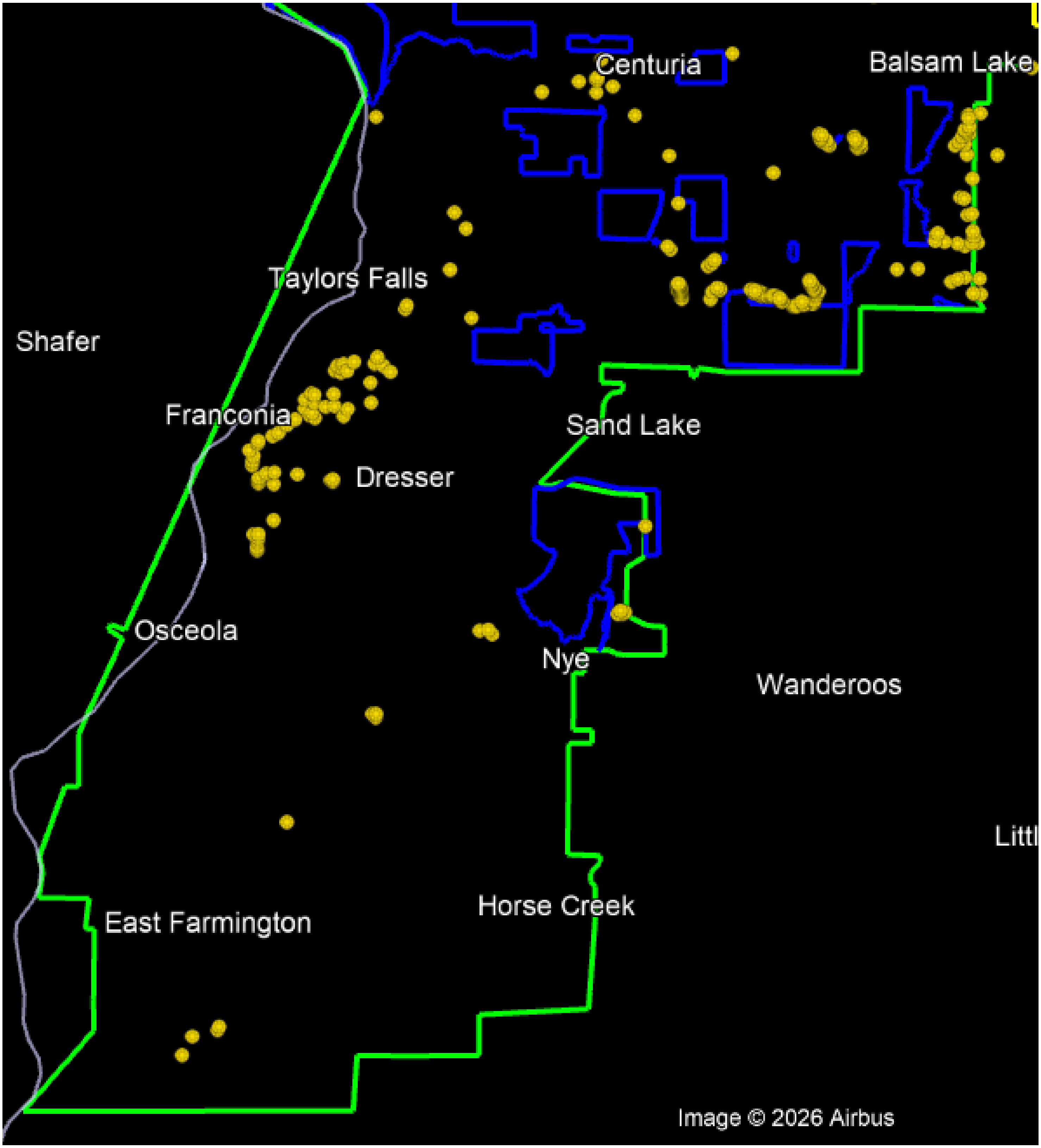


Lewis
West Sweden
Trade Lake
Four Corners
Frederic
Pole Cat Crossing
Atlas


Wolf Creek


Eureka Center


Balsam Lake
Long Lake
Balsam Lake
Lykens


Centuria
Balsam Lake
Taylors Falls
Shafer
Franconia
Sand Lake
Dresser
Osceola
Nye
Wanderoos
Littl
Horse Creek
East Farmington
Image © 2026 Airbus

DECLARATION OF SIDNEY M. SHERSTAD

I, Sidney M. Sherstad, declare under penalty of perjury:

1. I am the General Manager of Siren Telephone Company.

2. I have read the foregoing Joint Application requesting that the Federal Communications Commission consent to the transfer of control of the domestic and international Section 214 authorizations held by Siren Telephone Company to Lakeland Communications, Inc.

3. The statements made in the Joint Application with respect to Siren Telephone Company are true and accurate to the best of my knowledge, information, and belief.

Sidney M. Sherstad

Sidney M. Sherstad

Dated: Aug 3, 2026

DECLARATION OF ALEC MORTEL

I, Alec Mortel, declare under penalty of perjury:

1. I am the General Manager of Lakeland Communications, Inc..

2. I have read the foregoing Joint Application requesting that the Federal Communications Commission consent to the transfer of control of the domestic and international Section 214 authorizations held by Siren Telephone Company to Lakeland Communications, Inc.

3. The statements made in the Joint Application with respect to Lakeland Communications, Inc. are true and accurate to the best of my information, knowledge, and belief.

Alec Mortel

Dated: August 3rd, 2026