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

In the Matter of	)	
	)	
Hooper Telephone Company dba Westel Systems	)	
(FRN: 0002392249)	)	
Transferor	)	
	)	**WC Docket No. 26-_____**
and	)	
	)	
Northeast Nebraska Telephone Company	)	
(FRN: 0002388882)	)	
Transferee	)	
	)	
For Consent to Transfer Control of Hooper Telephone Company and HTC Communications, L.L.C. pursuant to Section 214 of the Communications Act of 1934, as amended.	)	
	)	

JOINT APPLICATION FOR TRANSFER OF CONTROL OF
DOMESTIC AND INTERNATIONAL AUTHORIZATIONS

Northeast Nebraska Telephone Company ("NNTC" or the "Transferee"), Hooper Telephone Company dba Westel Systems ("Hooper" or the "Transferor") and its wholly-owned subsidiary HTC Communications, L.L.C. ("HTC") (collectively the "Applicants") hereby file this transfer of control application to allow NNTC to purchase from Hooper's existing shareholders all of the issued and outstanding shares of stock of Hooper and thereby to indirectly acquire all of the outstanding membership interests in HTC. Each of the Applicants is organized under the existing laws of the State of Nebraska as either a corporation or limited liability company. The transfer of control will be consummated through the purchase by NNTC of one hundred percent (100%) of the issued and outstanding shares of stock of Hooper. Post consummation, Hooper and HTC: (1) will continue to provide those services that they each currently provide; and (2) will each become wholly owned subsidiaries of NNTC. Due to the

adjacent service areas of NNTC and Hooper, Applicants respectfully submit that this Application is not subject to the domestic "streamlined" processing found in Section 63.03 of the Rules of the Federal Communications Commission ("the "Commission" or the "FCC) (*see infra)* but the transfer of HTC's international Section 214 authorization is subject to Section 63.12 "streamlined processing." Nonetheless, and as to NNTC and Hooper, the Applicants respectfully submit that no issues regarding competition should arise from the Commission's processing of this transaction as non-streamlined and thus the prompt grant of the instant application is in the public interest.

SECTION 63.04(a) INFORMATION

I. Background

NNTC is a rate of return rural incumbent local exchange carrier ("RLEC") telephone cooperative operating in portions of twenty eight (28) Nebraska counties (Antelope, Burt, Dakota, Wheeler, Wayne, Butler, Brown, Boyd, Cedar, Dixon, Dodge, Hamilton, Holt, Knox, Madison, Merrick, Pierce, Platte, Polk, Rock, Saunders, Seward, Stanton, Thurston, Washington, Wheeler, Nance, and Loup), all of which are in the northeast portion of Nebraska. NNTC provides local exchange, exchange access, video and broadband service to approximately 6,000 access lines in this rural area.[1] NNTC is a corporation organized under the laws of the State of Nebraska and is a "not-for-profit" telephone cooperative corporation with its principal place of

[1] NNTC's wholly owned subsidiary, CenCom, Inc. dba NNTC Long Distance ("CenCom") provides intrastate and interstate interexchange long distance services. CenCom also provides Internet Protocol Television. A separate corporate operating division of NNTC also provides facilities-based competitive local exchange carrier services in various areas currently served by the larger Nebraska incumbent local exchange carriers including the Homer exchange (operated by CenturyLink) and the planned operations within discrete areas located in Antelope (Citizens/Frontier), Butler (Windstream), Dakota (CenturyLink), and Polk (Windstream) counties. All such areas are outside the incumbent RLEC service areas of NNTC and Hooper.

business located at 110 East Elk Street, P.O. Box 66, Jackson, NE 68743. Northeast has been operating in Nebraska as a provider of telecommunications services for over 71 years subject to regulation by the Commission and the Nebraska Public Service Commission (the "NE PSC").

Pursuant to the Commission's *Public Notice*, DA 22-436, released April 19, 2022 (the "*Best Practices Public Notice*"), the following information is provided:

1. NNTC has been designated as an Eligible Telecommunications Carrier ("ETC") by the NE PSC;
2. NNTC's Study Area Code is 371576 and is not affiliated with any other Incumbent Local Exchange Carrier ("ILEC") or Competitive Local Exchange Carrier ("CLEC");
3. As a rate of return ETC, NNTC receives Intercarrier Compensation ("ICC") and receives its federal Universal Service Fund ("USF") disbursements pursuant to the Commission-authorized Enhanced Alternative Connect America Cost Model ("EACAM");
4. Pursuant to the FCC's *Best Practices Public Notice,* NNTC does not currently receive "Connect America Fund (CAF) Phase II, Auction (Auction 903) support, Rural Digital Opportunity Fund (RDOF) Phase I Auction, (Auction 904) support, Alaska Plan support, CAF Broadband Loop Support, [or] Rural Broadband Experiment support";[2]

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[2] NNTC has not received non-USF in Hooper's single exchange service area (*i.e.*, the Uehling exchange) nor in in any area adjacent to the Hooper service area.

5. NNTC participates and will continue to participate in the FCC's "Lifeline" program.

Hooper also is a rate of return RLEC operating in portions of Burt, Cuming, Dodge, and Washington Counties in the northeast portion of Nebraska, providing local exchange, exchange access, video and broadband service to approximately 345 access lines in this rural area. Hooper presently does business under the registered trade name "WesTel Systems." Hooper is a corporation organized under the laws of the State of Nebraska with its principal place of business at 12 East 3rd Street, P.O. Box 330, Remsen, Iowa 51050-0330. Hooper has business offices located in Hooper and Uehling, Nebraska. Hooper owns 100% of the membership interests of HTC.

Also pursuant to the *Best Practices Public Notice*, the following information is provided:

1. Hooper has been designated as an ETC by the NE PSC;
2. Hooper's Study Area Code is 371563 and is affiliated with another ILEC – West Iowa Telephone Company (Study Area Code 351331)[3] – but no CLEC;
3. As a rate of return ETC, Hooper receives ICC and receives its federal USF disbursements pursuant to what the FCC refers to as "revised" Alternative Connect America Cost Model I;[4]

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[3] Although a ten percent (10%) or greater owner of Hooper, West Iowa Telephone Company's operations and those of its subsidiaries, including MidlandsNet, LLC, are not altered by the instant transaction other than the sale of Hooper and HTC.

[4] *In the Matter of Reforming the High-Cost Program or an All-IP Future, Connect America Fund: A National Broadband Plan for our Future High-Cost Universal Support, Notice of Proposed Rulemaking*, WC Dockets Nos. 26-96, 10-90, FCC 26-35, released May 26, 2026 at ¶ 3 (The FCC seeks comments on" areas supported by the sunsetting Alternative Connect America Cost Model (A-CAM) I, Revised A-CAM I, and A-CAM II mechanisms"), 28 (Proposing to adopt "a short-

4. Pursuant to the FCC's *Best Practices Public Notice,* neither Hooper nor HTC receives "Connect America Fund (CAF) Phase II, Auction (Auction 903) support, Rural Digital Opportunity Fund (RDOF) Phase I Auction, (Auction 904) support, Alaska Plan support, Alternative Connect America Cost Model support, CAF Broadband Loop Support, [or] Rural Broadband Experiment support";[5] and

5. Hooper participates and will continue to participate in the FCC's "Lifeline" program.

HTC is a limited liability company organized under the laws of the State of Nebraska. HTC provides resold domestic interstate interexchange long distance services originated in and around the service area of its parent company, Hooper. HTC also provides resold international service pursuant to its Commission-issued international Section 214 authorization, ITC-214-19980812-00560.[6]

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term A-CAM I extension through the end of 2028" that would have all three ACAM mechanisms "conclude at the end of 2028."

[5] Although Hooper's single ten percent (10%) or greater shareholder, West Iowa Telephone Company (*see* below), has received state funded grants (some of which would likely have been received by the State of Iowa from the federal government) and has also received ARPA and CARES funding, neither Hooper nor HCL has received any non-USF state or federal grants.

[6] HTC notes that, while its international Section 214 authority was granted under the name HTC Comm, Inc., that entity merged into HTC in 2001 without any change in ownership by Hooper from the time of the initial grant of the authorization. Apparently, the fact of this pro forma corporate restructuring notification was not submitted to the Commission, and Hooper and HTC respectfully regret that fact. To rectify this inadvertent oversight, HTC Comm., Inc and HTC are submitting simultaneously a pro forma assignment application via the Commission's ICFS system.

II. Description of the Transaction

Pursuant to the proposed transaction, the transfer of control will be consummated through the acquisition by NNTC of one hundred percent (100%) of the issued and outstanding stock of Hooper and ownership and control of Hooper and HTC. Since the proposed transaction is structured as a stock purchase, there is no transfer of Hooper's assets, liabilities, customers, or contracts with other providers or those of HTC.

Upon completion of the proposed transaction, Hooper and HTC will retain their respective operating authorities and, for Hooper, its designation as an ETC. Thus, post consummation, Hooper and HTC will continue to exist and operate in their respective service territories, under the same names, and provide service pursuant to then-existing rates, terms and conditions. No carrier changes are associated with the proposed transaction, and no customer service or billing contact information will change as a result of the transfer. The proposed transaction will not affect customers' preferred carrier freezes. Accordingly, the proposed transactions will be transparent to consumers.

The Applicants have sought authorization from the NE PSC regarding the transfers of control described above. As is true with the required FCC approvals, prior authorization by the NE PSC is required in order to consummate the proposed transaction.

III. Transfer of Control of International Section 214 Authorization

Applicant HTC resells switched international long distance toll services to residential and business customers pursuant to an international Section 214 authorization granted by the Commission under File No. ITC-214-19980812-00560.[7] In accordance with the requirements of

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[7] The information contained herein references both Hooper and HTC. The combined Hooper and HTC information is provided because it is relevant to the Applicants' responses in Section

Section 63.24(e) of the Commission's Rules, Applicants submit the following Section 63.18 information:

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

Transferor:

Hooper Telephone Company dba Westel Systems (10% owner of HTC Communications, L.L.C.

Kristine Mohning
General Manager
Hooper Telephone Company
HTC Communications, L.L.C.
012 East 3rd St.
P.O. Box 330
Remsen, Iowa 51050
Telephone: (712) 786-5563
Facsimile: (712) 786-2400
Email address: kmohning@westelsystems.com

With a copy to

Ryan J. Taylor
Cutler Law Firm, LLP
140 N. Phillips Ave., 4th Fl.
Sioux Falls, SD 57104-6725
Telephone: (605) 335-4950
Facsimile: (605) 335-4961
Email Address: ryant@cutlerlawfirm.com

Transferee:

Northeast Nebraska Telephone Company

Pat McElroy
General Manager and CEO
Northeast Nebraska Telephone Company

IV *infra* regarding the transfer of the domestic Section 214 authorizations held by each of these companies. As noted in this Section III, the only international authorization that is subject to transfer in the proposed transaction is held by HTC. Hooper has no international Section 214 authorization.

110 East Elk Street
P.O. Box 66
Jackson, NE 68743
Telephone: 402-632-2227
Facsimile: 402-632-4770
Email address: Pat.mcelroy@nntcemployee.com

With a copy to:

Thomas J. Moorman
Woods Aitken LLP
5335 Wisconsin Ave., N.W., Suite 440
Washington, D.C. 20015
Telephone: (202) 944-9502
Facsimile: (202) 944-9501
Email address: tmoorman@woodsaitken.com

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

Hooper is a corporation organized under the laws of the State of Nebraska.

HTC is a limited liability company organized under the laws of the State of Nebraska.

NNTC is a corporation organized under the laws of the State of Nebraska.

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

Transferor:

Hooper Telephone Company dba Westel Systems and HTC Communications, L.L.C.

Kristine Mohning
General Manager
Hooper Telephone Company
HTC Communications, L.L.C.
012 East 3rd St.
P.O. Box 330
Remsen, Iowa 51050
Telephone: (712) 786-5563
Facsimile: (712) 786-2400
Email address: kmohning@westelsystems.com

With a copy to

Ryan J. Taylor
Cutler Law Firm, LLP
140 N. Phillips Ave., 4th Fl.
Sioux Falls, SD 57104-6725
Telephone: (605) 335-4950
Facsimile: (605) 335-4961
Email Address: ryant@cutlerlawfirm.com

Transferee:

Northeast Nebraska Telephone Company

Pat McElroy
General Manager and CEO
Northeast Nebraska Telephone Company
110 East Elk Street
P.O. Box 66
Jackson, NE 68743
Telephone: 402-632-2227
Facsimile: 402-632-4770
Email address: Pat.mcelroy@nntcemployee.com

With a copy to:

Thomas J. Moorman
Woods Aitken LLP
5335 Wisconsin Ave., N.W., Suite 440
Washington, D.C. 20015
Telephone: (202) 944-9502
Facsimile: (202) 944-9501
Email address: tmoorman@woodsaitken.com

(4) Statement as to whether the applicants had previously received authority under Section 214 of the Act.

Hooper holds a blanket domestic Section 214 authorization as provided for under 47 C.F.R. § 63.01.[8] HTC holds a blanket domestic Section 214 authorization as provided for under 47 C.F.R. § 63.01 and operates under international Section 214 authorization under File No. ITC-214-19980812-00560. NNTC holds a blanket domestic Section 214 authorization as provided for under 47 C.F.R. § 63.01.

(5) Name, address, citizenship and principal business of any person or entity that directly or indirectly owns at least ten percent of the equity of the applicant entities.

Transferor:

Hooper is the one hundred percent (100%) owner of all member interests in HTC. The only ten percent (10%) owner of the shareholder interest in Hooper is West Iowa Telephone Company ("WITC"). WITC owns approximately ninety-four percent (94%) of Hooper. WITC is a corporation organized under the laws of the State of Iowa with its principal place of business located at 12 East 3rd Street, P.O. Box 330 Remsen, Iowa 51050-0330. WITC is a rate of return ILEC operating in portions of Adair, Audubon, Buena Vista, Cass, Cherokee, Clay, O'Brien, Plymouth and Sioux Counties, Iowa located in northeastern Iowa. WITC provides local exchange, exchange access, video, and broadband service to approximately 1,700 access lines in this rural area. WITC does business under the registered trade names WesTel Systems and MidlandsNet LLC ("MidlandsNet").

WITC also owns one hundred percent (100.0%) of the membership interests of all classes of MidlandsNet. MidlandsNet is a limited liability company organized under the laws of the

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[6] Hooper also provides cable television service in the cities of Hooper, Winslow, and Uehling, Nebraska located in northeastern Nebraska within the ILEC service area of Hooper.

State of Iowa. MidlandsNet provides resold domestic, interstate, and international interexchange long distance services originated in and around the service area of its parent company, WITC.

The only shareholder of WITC with a derivative interest of ten percent (10.0%) or greater in Hooper is the W.H. Daubendiek Trust Under His Last Will and Testament (the "WH Daubendiek Trust"). The WH Daubendiek is an Iowa trust which holds approximately eighty-eight and nine-tenths percent (88.9%) of the outstanding shares of the sole class of capital stock in WITC. This equates to an indirect derivative ownership interest in Hooper of approximately eighty-three and six-tenths percent (83.6%). All current trustees and beneficiaries of the WH Daubendiek Trust are U.S. citizens. The situs of the WH Daubendiek Trust and the identities of the four current trustees of the WH Daubendiek Trust are set forth below.

Name	**Title**	**Occupation**	**Citizenship**
W.H. Daubendiek Trust Under His Last Will and Testament	N/A	Trust – holding company	United States
James L. Daubendiek	Trustee	Retired	United States
Stephany Harvey	Trustee	Retired	United States
Jenny Robinson	Trustee	Chief Financial Officer – Tourism and Entertainment Industry	United States
William H. Daubendiek II	Trustee	Retired	United States

The current beneficiaries of the WH Daubendiek Trust who indirectly hold a derivative interest in Hooper of ten percent (10.0%) or greater by virtue of their beneficiary interest in the WH Daubendiek Trust and their personal holdings are identified below.

Name	Address	Occupation	Citizenship	Derivative Ownership Interest
James L. Daubendiek	1518 Hawthorne Lane Jefferson, IA 50129	Retired	United States	11.45%
Sarah Daubendiek Blackmon	216 Golf Drive Holy Lake Ranch, TX 75765	Retired	United States	11.83%
Umi Daubendeck	5103 Beverly Skyline Austin, TX 78731	Student	United States	22.79%
William H. Daubendiek II	45837 150th Street P.O. Box 596 Remsen, IA 51050	Retired	United States	23.12%

No other shareholders of WITC or beneficiaries of the WH Daubendiek Trust hold a sufficient direct or indirect interest in WITC to equate to a derivative interest in Hooper of ten percent (10.0%) or greater.

Transferee:

As indicated above, NNTC is a not-for-profit corporation and is a telephone cooperative. No shareholder owns Ten Percent (10%) or more of the issued and outstanding stock of NNTC. Operational control of NNTC rests with its Board of Directors and its General Manager and CEO. The individuals comprising the Board of Directors and the General Manager and CEO of NNTC are as follows:

Name	Title	Occupation	Citizenship
David Armstrong	President	Retired	USA
LeRoy Dvorak	Vice President	Retired	USA
Jeff Hartung	Treasurer	Business Owner	USA
John Knievel	Secretary	Retired	USA

Name	Title	Occupation	Citizenship
Larry Domina	Director	Farmer	USA
Greg Hoffman	Director	Retired	USA
Tracy Ludwig	Director	Nurse	USA
Jeff Hurrell	Director	Farmer	USA
Ed Siffring	Director	Retired	USA
Pat McElroy	General Manager and CEO	Telecommunications	USA

The address for each of these individuals is: 110 East Elk Street, P.O. Box 66, Jackson, NE 68743.

Other than CenCom, NNTC holds a twenty-five percent (25%) member interest in NebraskaLink Holdings LLC dba OPTK Networks which is primarily a fiber transport entity operating within the State of Nebraska but also holds an interexchange carrier certification from the NE PSC.

(6) Certification as to whether or not Transferee is, or is affiliated with, a foreign carrier.

NNTC certifies that it is not a foreign carrier in any country, nor is it affiliated with any foreign carrier.

(7) Certification as to whether or not Transferee seeks to provide international telecommunications services to any country for which certain conditions are true.

NNTC certifies that it does not seek to provide international telecommunications services to any destination country to which 47 C.F.R. § 63.18(j)(1) through (j)(4) applies.

(8) Showing regarding provision of international telecommunications service to a country where the applicant is a foreign carrier or is affiliated with a foreign carrier.

N/A

(9) Regulatory classification under Section 63.10 of the Rules for foreign-affiliated carrier.

N/A

(10) Certification that applicant has not agreed to accept special concessions directly or indirectly from any foreign carrier.

HTC and NNTC certify that each (a) 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 (b) will not enter into such agreements in the future.

(11) Certification pursuant to 47 C.F.R. §§ 1.2001-1.2003 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, 21 U.S.C. § 583.

Applicants hereby certify, pursuant to 47 C.F.R. §§ 1.2001-1.2003, that to the best of their knowledge, information, and belief, no party to the application is subject to denial of federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 583.

(12) Qualification for streamlined processing.

This Application qualifies for international streamlined processing under Sections 63.12(a) and (b) of the Commission's Rules. No party is affiliated with any foreign carrier in any destination market. No party has an affiliation with a dominant US carrier whose international switched or private line services the applicants seek authority to resell. No party to this application seeks 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. Authorization is sought to complete a proposed transaction that would continue the current operations of HTC as a non-dominant carrier reselling the international switched services of one or more unaffiliated US carriers.

In addition to the above information, Applicants' respectfully submit that Pursuant to 47 C.F.R. § 63.10(a)(1), HCL qualifies as a non-dominant carrier in that it "has no affiliation with, and that itself is not, a foreign carrier in a particular country to which it provides service (i.e., a destination country)." Likewise, HTC respectfully submits that no foreign ownership is at issue and thus 47 C.F.R. § 1.40001(a)(2) is in applicable. *See* 47 C.F.R. §1.40001(a)(1).

IV. Transfer of Control of Domestic Section 214 Authorizations

Pursuant to Section 63.04(b) of the Commission's Rules, Applicants submit information required pursuant to Sections 63.04(a)(1) through 63.04(a)(12) of the Commission's Rules:

(1) The name, address and telephone number of each applicant.

Please see Section III(1).

(5) The government, state, or territory under the laws of which each corporate or partnership applicant is organized.

Please see Section III(2).

(5) 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 addressed.

Please see Section III(3).

(4) The name, address, citizenship and principal business of any person or entity that directly or indirectly owns at least ten (10) percent of the equity of the applicant, and the percentage of equity owned by each of those entities (to the nearest one (1) percent).

Please see Section III(5). Attachment B contains the required ownership diagram as provide for in 47 C.F.R. §63.04(a)(4)(ii).

(5) Certification pursuant to §§1.2001 through 1.2003 of this chapter that no party to the application is 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.

Please see Section III(11).

(6) Description of the Transaction.

Please see Section II.

(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.

With respect to the Transferors, please see Section I and Section III(4).

With respect to the Transferees, please see Section III(5).

See also Attachment A.

(8) Statement as to how the application fits into one or more of the presumptive streamlined categories in Section 63.03 of the Commission's Rules or why it is otherwise appropriate for streamlined treatment.

Applicants' respectfully note that, due to adjacent service areas associated with the operations of NNTC and Hooper as reflected in the attached map (*see* Attachment A hereto and incorporated herein by reference), the instant request for Commission approval does not qualify for streamlined processing. *See* 47 C.F.R. § 63.03(b)(2)(iii). Except for this adjacency issue, Applicants respectfully submit that the other factors associated with streamlined processing apply in that immediately following the Transaction (i) Transferee (and its wholly-owned subsidiary that provides domestic interexchange long distance service – CenCom) will have a market share in the interstate, interexchange market of less than ten percent (10%) (*see* 47 C.F.R. § 63.03(b)(2))) and, with respect to Section 63.03(b)(2)(ii), HTC provides no competitive local exchange service that competes with NNTC or Hooper. Likewise, with respect to Section 63.03(b)(2)(iii), NNTC serves approximately 6,000 access lines in portions of Antelope, Burt, Dakota, Wheeler, Wayne, Butler, Brown, Boyd, Cedar, Dixon, Dodge, Hamilton, Holt, Knox, Madison, Merrick, Pierce, Platte, Polk, Rock, Saunders, Seward, Stanton, Thurston, Washington,

Wheeler, Nance, and Loup counties in northeast Nebraska, which is fewer than two (2) percent of the nation's subscriber lines installed in the aggregate nationwide.[9]

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

As noted herein, the instant request for Commission action seeks the transfer of control of HTC which, in turn, provided resold international services pursuant to File No. ITC-214-19980812-00560.

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

Neither NNTC, Hooper nor HTC is facing imminent business failure. Therefore, Applicants are not requesting special consideration for this reason.

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

No separately filed waiver requests are being sought in conjunction with the 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

Applicants respectfully submit that a grant of this application for the transfer of control of the Hooper and HTC to NNTC is in the public interest. The Applicants note that the service

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[9] As of June 30, 2025, the Commission reported that the seventy-eight (78) million retail voice telephone service connections (comprising fifteen (15) million end-user switch access lines and sixty-three (63) million interconnected voice over internet protocol subscriptions). *See Voice Telephone Services: Status as of June 30, 2025* (Industry Analysis Division, Office of Economics and Analysis, May, 2026) (the "*2026 Voice Telephone Report*"), Figures 1 and 2. Even if one isolates switched access lines using the FCC's figures noted above, NNTC's approximate 6,000 access lines are far less than 2% of the nation's switched access lines, access lines reported by the Commission, and the combined total using current numbers in a post-transaction environment, the combined NNTC and the approximate 345 Hooper switch access line total of approximately 6345 still is far less than the two percent (2%) threshold.

areas of both NNTC and Hooper have adequate wireless (mobile and fixed) service providers that, in turn, compete for the wireline services that are provided today. Such providers include Verizon, US Cellular, Viero, AMG/Nextlink, Starlink, T-Mobile, AT&T Wireless. Since wireless services were noted in the *2026 Voice Telephone Report* alongside end user counts for wireline service, no competitive voice issues should exist with respect to the proposed transaction which would otherwise preclude prompt action on the instant application.

Upon consummation of the contemplated transaction, NNTC's managerial, technical, and financial expertise will be used to oversee the operations of Hooper and HTC. In this regard, NNTC's executive team possesses nearly 100 years of combined experience in the telecommunications industry, including executives dedicated to operations, customer service, technology, construction, and other areas of expertise. Service related issues for the Hooper and HTC customer will continue to be addressed at the business offices in Hooper and Uehling, Nebraska in that NNTC's current plan is to continue to maintain these offices. Following the proposed transfer of control to NNTC, Hooper and HTC will be managed by NNTC, but will continue to be operated on a day-to-day basis by a majority of the existing employees. This approach will allow NNTC and its management team to improve upon the current level of customer support, increase investment in the communities that Hooper serves, further advance and improve Hooper's network infrastructure, and create even more growth opportunities for Hooper and the communities and customers it serves. As a result of the proven strategies that NNTC has successfully implemented in deploying and continually improving communication networks, it expects such strategies will result in the continued advancement of the telecommunications and broadband services currently being provided by Hooper to business and residential customers in rural Nebraska. These benefits will promote the availability of high-

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quality services for residential and business services in these areas. In addition, prompt grant of this Application will allow NNTC and its operating telecommunications carriers to take advantage of increased efficiencies that will be realized through the combined operations arising from consummation of the proposed transaction outlined herein and to do so in a manner that raises no competitive concerns that should delay Commission approval of the transaction.

Accordingly, the Applicants respectfully submit that the public interest would be served by a grant of this requested transfer of control.

V. CONCLUSION

For the foregoing reasons, the Applicants respectfully request the expeditious grant of this Application.

Respectfully submitted,

Hooper Telephone Company dba Westel Systems
HTC Communications, L.L.C.

By DocuSigned by: Ryan J Taylor 1788FEE10EBE426...

Ryan J. Taylor
Cutler Law Firm, LLP
140 N. Phillips Ave., 4th Fl.
Sioux Falls, SD 57104-6725
Telephone: (605) 335-4950
Facsimile: (605) 335-4961
Email Address: ryant@cutlerlawfirm.com

Northeast Nebraska Telephone Company

By: Thomas J Moorman

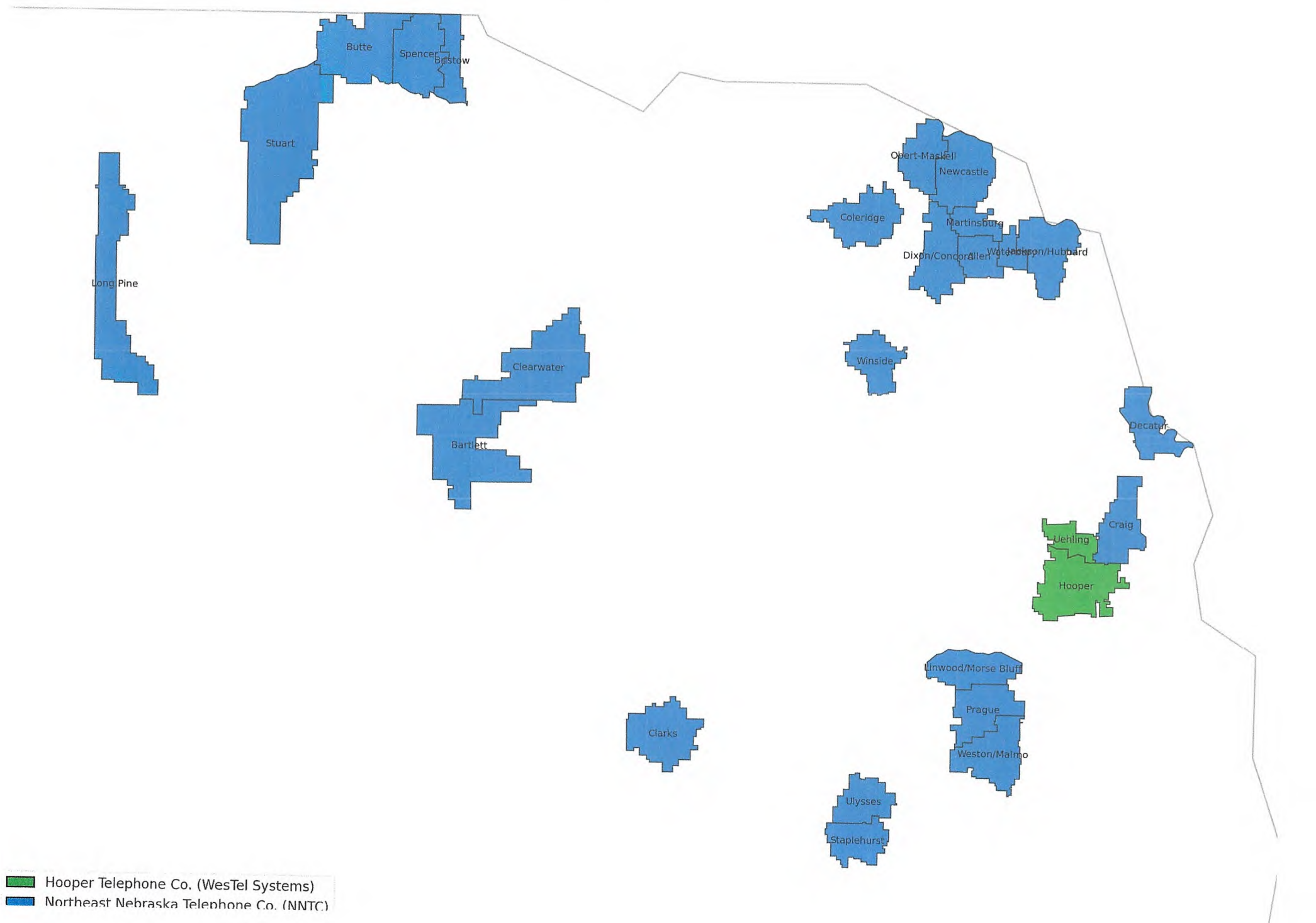
Thomas J. Moorman
Woods Aitken LLP
5335 Wisconsin Avenue, NW
Suite 440
Washington, D.C. 20015
Telephone: (202) 944-9502
Facsimile: (202) 944-9501
Email Address: tmoorman@woodsaitken.com

August 17, 2026

Attachment A

Northeast Nebraska Telephone Company and
Hooper Telephone Company dba Westel Systems
Overlay of Respective State of Nebraska Service Area Map

Telephone Company Exchange Areas

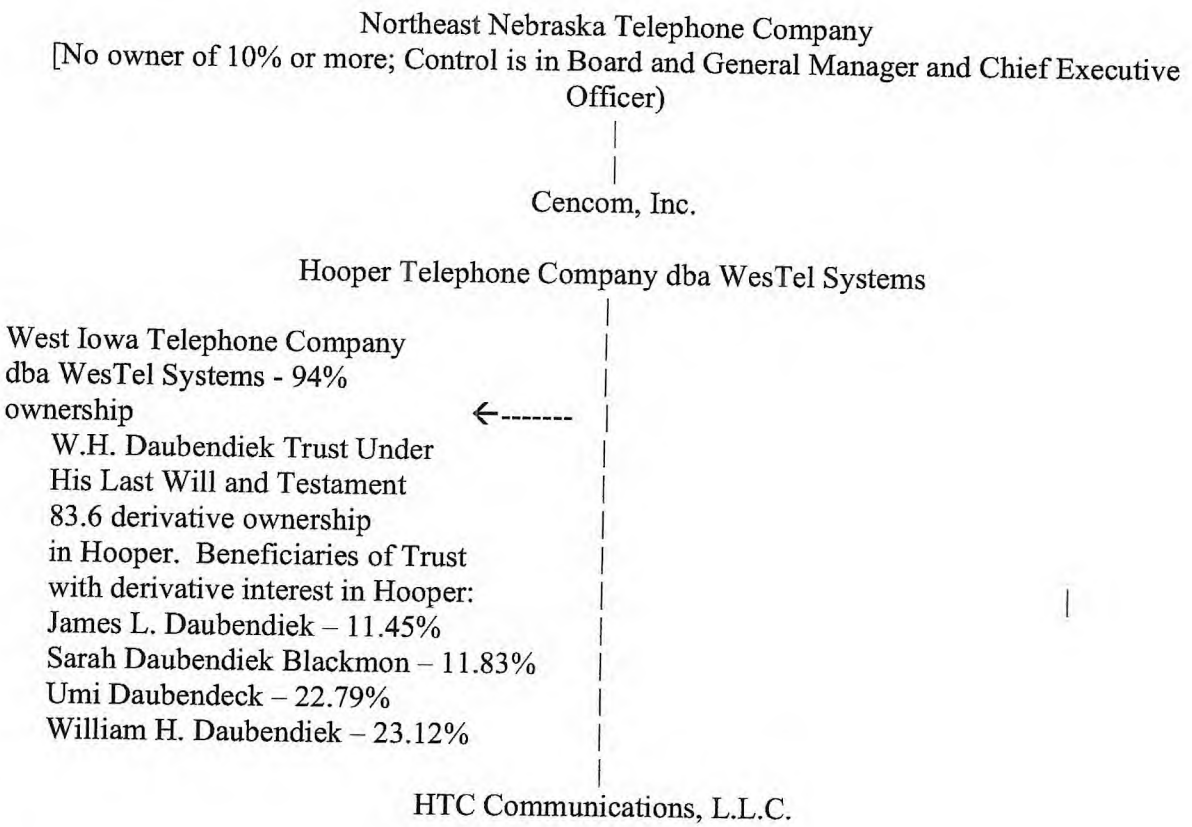


Attachment B

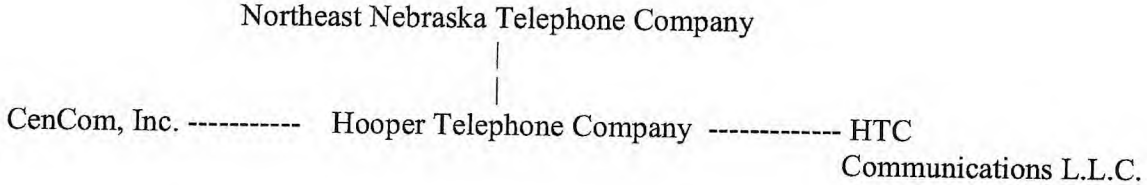
Pre and Post Transaction Corporate Charts
Pursuant to 47 C.F.R. § 63.04(a)(4)(ii)

(All ownership interests are 100% unless other noted)

Pre-Transaction



Post-Transaction



DECLARATION

I, Kristine Mohning, General Manager of Hooper Telephone Company and HTC Communications, L.L.C. (the "Companie"), do hereby declare under penalties of perjury that I have read the foregoing "Joint Application for Transfer of Control of Domestic and International Authorizations" and that the information contained therein regarding the Companies is true and accurate to the best of my knowledge, information, and belief.

Kristine Mohning
General Manager
Hooper Telephone Company
HTC Communications, L.L.C.

Date: 8/17/2020

DECLARATION

I, Pat McElroy, General Manager and Chief Executive Office of Northeast Nebraska Telephone Company ("NNTC"), do hereby declare under penalties of perjury that I have read the foregoing "Joint Application for Transfer of Control of Domestic and International Authorizations" and that the information contained therein regarding NNTC is true and accurate to the best of my knowledge, information, and belief.

Pat McElroy
General Manager and Chief Executive Officer
Northeast Nebraska Telephone Company

Date: 8/17/26