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ATTORNEYS AT LAW

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April 29, 2013

Steven King
Acting Executive Director/Secretary
Washington Utilities and Transportation Commission
1300 S Evergreen Park Dr. SW
Olympia, WA 98504-7250

RE: Notification of *Pro Forma* Merger of
Globalcom Inc. d/b/a GCI Globalcom Inc.
d/b/a First Communications of Illinois
and First Communications, LLC

Dear Mr. King:

On behalf of First Communications, LLC ("FCL") and Globalcom Inc. d/b/a GCI Globalcom Inc. d/b/a First Communications of Illinois ("Globalcom") (collectively referred to herein as the "Parties"), we hereby notify the Washington Utilities and Transportation Commission ("Commission") of the intra-corporate *pro forma* merger of Globalcom into FCL. Importantly, this intra-corporate *pro forma* transaction does not change the ultimate ownership of the Parties.

FCL is a wholly owned subsidiary of Summit Data Services Inc. Globalcom is a wholly owned subsidiary of First Global Telecom, Inc., which is wholly owned by Summit Data Services Inc. The merger of Globalcom and FCL will simplify the corporate structure and reduce the reporting and accounting burdens of FCL and provide operational efficiencies. Globalcom will cease to exist following the merger with FCL.

It is the Parties' understanding that Commission approval is not required in connection with the transaction described herein. Accordingly, the Parties will proceed on the understanding that the Commission requires no approval or other formal action with respect to the proposed transaction. This letter is filed for informational purposes only to ensure the continuing accuracy of the Commission's records. The Parties will notify the Commission when the transaction is complete.

The Parties

First Communications, LLC is an Ohio limited liability company with principal offices located at 3340 West Market Street, Akron, OH 44333. FCL is a wholly owned subsidiary of Summit Data Services Inc, an Ohio corporation, with offices located at 3421 Ridgewood Road, Suite 125, Akron, OH 44333. FCL provides local, private line, and/or long distance services to both business and residential customers in forty-nine (49) states.

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In Washington, FCL is authorized to provide interexchange services pursuant to authorization granted in Docket No. UT-061244 on August 26, 2006 and expanded authority to provide local exchange services pursuant to the same Docket on January 22, 2007. Further information regarding FCL and the services it provides has previously been submitted to the Commission and is therefore a matter of public record, and the Parties request that it be incorporated herein by reference.

Globalcom Inc. d/b/a GCI Globalcom Inc. d/b/a First Communications of Illinois is an Illinois corporation with principal offices located at 200 East Randolph Street, Suite 2300, Chicago, IL 60601. Globalcom is a wholly owned subsidiary of First Global Telecom, Inc., which is a wholly owned subsidiary of Summit Data Services Inc. Globalcom provides interexchange and/or local exchange services to business customers in thirty-two (32) states.

Globalcom is authorized to provide interexchange services in Washington pursuant to authorization granted in Docket No. UT-000903 on June 28, 2000. Further information regarding Globalcom and the services it provides has previously been submitted to the Commission and is therefore a matter of public record, and the Parties request that it be incorporated herein by reference.

Contacts

Inquiries or copies of any correspondence, orders, or other materials pertaining to this filing should be directed to:

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With copies to:

Mary Cegelski
First Communications, LLC
3340 West Market Street
Akron, OH 44333
Telephone: (330) 835-2272
Facsimile: (866) 540-8518
Email: mcegelski@firstcomm.com

The Transaction

FCL and Globalcom entered into an Agreement and Plan of Merger ("Agreement"). As part of its effort to streamline its corporate structure, FCL intends to merge Globalcom into FCL, with FCL as the surviving entity. Globalcom previously adopted the trade name of First Communications of Illinois and notified the Commission in correspondence dated November 5, 2008. Since the adoption of the trade name, Globalcom has provided service to customers under the First Communications name and logo. The merger will not result in a change to any

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aspect of a customer's services, including the rates, terms and conditions, the format of their bills, or their customer service contacts including the toll free numbers. Prior to the merger FCL and Globalcom shared the same officers and used the same sales and customer service teams. Immediately following the consummation of the proposed transaction, Globalcom will surrender its operating authority and cease to exist.

Public Interest Considerations

The Parties submit that the transaction described herein will serve the public interest. The merger will simplify the corporate structure, reduce the reporting and operational burdens of FCL and result in an entity better equipped to compete as a telecommunications provider. The proposed transaction will have no adverse impact on customers, and will not result in any changes to the provision of service. Globalcom previously adopted the fictitious name First Communications and has been doing business as First Communications since 2008. Therefore, customers are familiar with the First Communications name and logo which currently appear on customer bills. The Parties emphasize that the proposed transfer of control will be seamless and virtually transparent to customers of Globalcom, and in no event will it result in the discontinuance, reduction, loss, or impairment of service to customers.

Conclusion

The Parties certify that the merger and change in control are *pro forma* and will not result in a change in the actual controlling party of either party, except that Globalcom will cease to exist upon completion of the merger with FCL.

* * * *

Enclosed please find an original and three (3) copies of this notification. Please date stamp the duplicate copy and return same using the self-addressed stamped envelope. Should you have any questions regarding this filing, please contact Patrick D. Crocker at (269) 381-8893 or patrick@crockerlawfirm.com

Respectfully submitted,

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Patrick D. Crocker

PDC/pas