

November 24, 2015

VIA E-FILING

David Danner, Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive
Olympia, WA 98504-7250
records@wutc.wa.gov

Re: Notification Regarding the Proposed Transfer of Control of International Telcom, Ltd. to SwiftReach Networks, Inc.

Dear Mr. Danner:

By this letter, SwiftReach Networks, Inc. (“SNI”), and International Telcom, Ltd. (“ITL”) (collectively, the “Parties”) notify the Commission of the proposed transfer of control of ITL to SNI (the “ITL Transaction”). The Parties understand that Commission action is not required for the ITL Transaction. Accordingly, the Parties submit this letter for informational purposes.

Description of the Parties

A. SwiftReach Networks, Inc.

SNI is a corporation organized under the laws of the State of New Jersey whose principal address is 14 Industrial Avenue, Suite 4, Mahwah, NJ 07430. SNI is a wholly owned, direct subsidiary of Afognak Holdings, Inc. a Delaware corporation (“AHI”). AHI has no majority owner.

SNI has been providing emergency notification services since 2006. SNI provides notification services via voice and SMS platforms. SNI does not currently hold any telecommunications licenses in the State of Washington.

B. International Telcom, Ltd.

ITL is a Delaware limited liability company and has a principal place of business at 417 Second Avenue West, Seattle, WA 98119.

ITL provides access to the public switched telephone network, telephone numbers and other functionalities to its customers primarily by providing “800” numbers and services. In Washington, ITL is authorized to provide intrastate telecommunications services pursuant to its Certificate of Registration as a telecommunications company with competitive classification granted in Docket No. UT-961055. ITL is also authorized by the FCC to provide domestic and international telecommunications services.

Contacts

For the purposes of this filing, contacts are as follows:

for SNI:

Alex Gertsburg
Jeffrey Caso
The Gertsburg Law Firm Co., LPA
36 South Franklin Street
Chagrin Falls, OH 44022
440-571-7777 (tel)
440-571-7779 (fax)
ag@gertsburglaw.com
jc@gertsburglaw.com

with a copy to:

Kevin Alward, Vice President
SwiftReach Networks, Inc.
14 Industrial Avenue, Suite 4
Mahwah, NJ 07430
201-236-8625 (tel)
201-236-1222 (fax)
kalward@swiftreach.com

for ITL:

Michael P. Donahue
Marashlian & Donahue, PLLC
1420 Spring Hill Road, Suite 401
McLean, VA 22102
703-714-1319 (tel)
703-563-6222 (fax)
mpd@commlawgroup.com

with a copy to:

Yvette Eisenberg Melendez, President
International Telcom, Ltd.
417 Second Avenue West
Seattle, WA 98119
206-479-2600 (tel)
206-479-2616 (fax)
Yvette@kall8.com

Description of the ITL Transaction

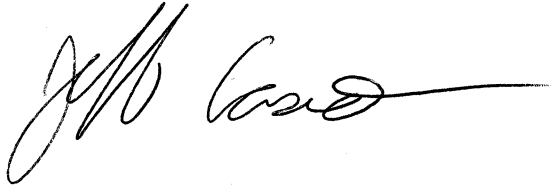
Pursuant to a Stock Purchase Agreement between/among ITL and SNI, dated as of November 24, 2015 (the "Agreement"), SNI will acquire all of the issued and outstanding stock in ITL. As a result, direct ownership and control of ITL will be transferred to SNI. For the Commission's reference, a chart depicting the pre- and post-ITL Transaction ownership of ITL is provided as Exhibit A.

The ITL Transaction will be conducted in a manner that will be transparent to ITL customers and any future name change or service changes will be preceded by appropriate notices to customers as well as any required regulatory filings. The ITL Transaction will not result in any immediate change of carrier for customers or any assignment of authorizations, and in no event will it result in the discontinuance, reduction, loss, or impairment of service to customers. Following consummation of the ITL Transaction, ITL will continue to provide high-quality communications services to its customers without interruption and without immediate change in rates, terms or conditions. The only change immediately following closing of the ITL Transaction from a consumer's perspective is that SNI, will be the new owner of ITL.

* * * *

Please acknowledge receipt and acceptance of this filing. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "AG Cases", with a long horizontal flourish extending to the right.

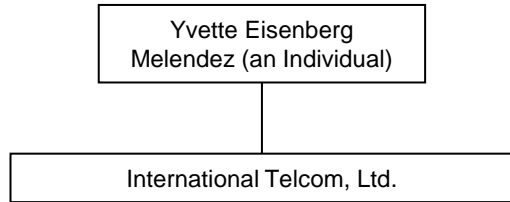
Alex Gertsburg
Jeffrey Caso

Counsel for SwiftReach Networks, Inc.

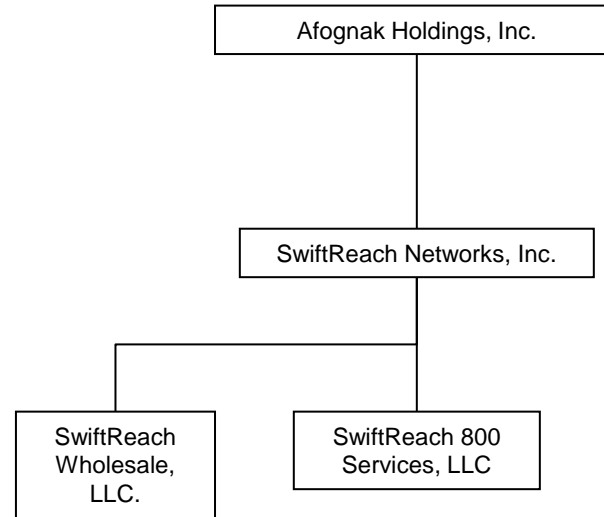
EXHIBIT A

Pre- and Post- ITL. Transaction Ownership of ITL

Current Corporate Organizational Structure of International Telcom, Ltd.

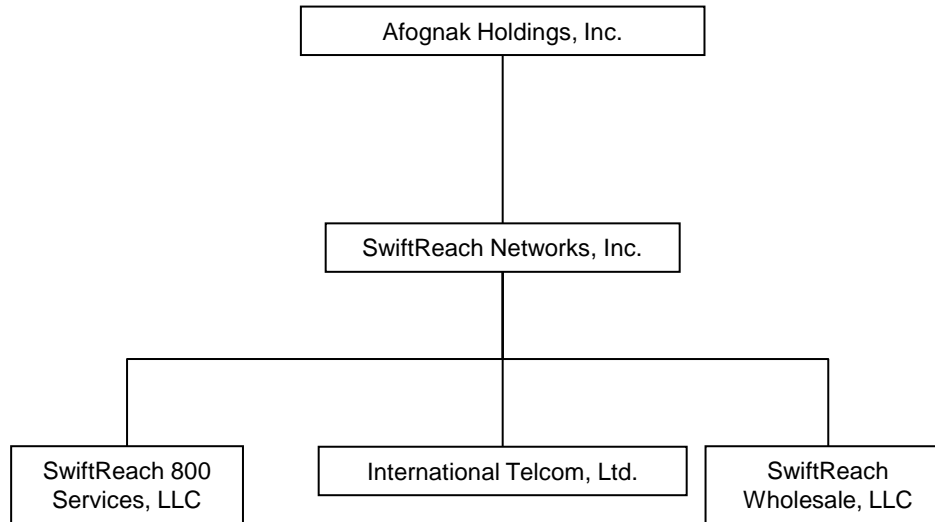


Current Corporate Organizational Structure of SwiftReach Networks, Inc.



All ownership percentages are 100%.

Post-Closing Corporate Organizational Structure of SwiftReach Networks, Inc. and International Telcom, Ltd.




All ownership percentages are 100%.

Verifications

VERIFICATION

I, Kevin Alward, state that I am Chief Executive Officer of SwiftReach Networks, Inc. (the "Company"); that I am authorized to make this Verification on behalf of the Company; that the foregoing filing was prepared under my direction and supervision; and that the contents with respect to the Company are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of November 2015.

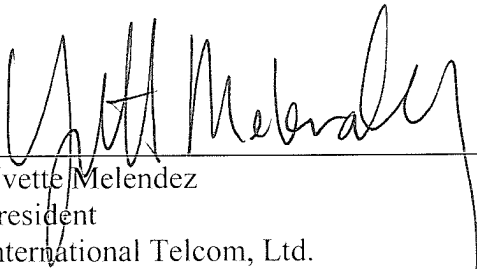


Kevin Alward
Chief Executive Officer
SwiftReach Networks, Inc.

VERIFICATION

I, Yvette Eisenberg Melendez, state that I am President of International Telcom, Ltd. (the “Company”); that I am authorized to make this Verification on behalf of the Company; that the foregoing filing was prepared under my direction and supervision; and that the contents with respect to the Company are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 23rd day of November 2015.



Yvette Melendez
President
International Telcom, Ltd.