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October 21, 2021  
Via Web Filing

Amanda Maxwell, Executive Director and Secretary  
Washington Utilities & Transportation Comm.  
621 Woodland Square Loop  
Lacey, WA 98503

RE: Notice of a Transfer of Customers for Legent Comm LLC d/b/a Long Distance Services d/b/a Long Distance America and Protel Advantage, Inc.

Dear Ms. Maxwell:

Enclosed for filing please find notice of a transfer of customer from Protel Advantage, Inc. to Legent Comm LLC d/b/a Long Distance Services d/b/a Long Distance America.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to [Sthomas@inteserra.com](mailto:Sthomas@inteserra.com). Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas  
Consultant

tms: WAX2101

Enclosures  
ST/mp

**Legent Comm LLC**  
**Description of Transaction**  
**Notification of a Transfer of Customers**

Legent Comm LLC d/b/a Long Distance Services d/b/a Long Distance America (“Legent”) and Protel Advantage, Inc. (“Protel”), collectively the “Parties”, hereby notify the Washington Utilities and Transportation Commission (“Commission”) of a transfer of customers from Protel to Legent. Following the completion of the customer transfer, Protel will no longer operate within Washington.

**I. The Parties**

Legent Comm LLC is a Nevada limited liability company formed on March 30, 2013 with its headquarters located at 10161 Park Run Dr., Suite 223 Las Vegas, NV 89145. The Company originally received authority to provide interexchange telecommunications services in the state of Washington in Docket No. UT-131523 on February 1, 2014.

Protel Advantage, Inc. is a Minnesota corporation formed on March 20, 1995 with its headquarters located at 6604 Old Goldmine Road, Marshville, NC 28103. The Company originally received authority to provide interexchange telecommunications services in the state of Washington in Docket No. UT-970018 on February 8, 1997.

**II. Description of the Transaction**

Pursuant to a Purchase Agreement (“Agreement”) between the Parties, Protel proposes to transfer its customer base to Legent Comm, which will become the service provider for the resold long distance telecommunications services that the customers currently receive from Protel. Upon closing of the transaction, Protel will discontinue its intrastate, interstate and international resold long distance service offerings, and wishes to cancel its authority.

The proposed transfer of customer base will have no adverse impact on Protel’s customers who will continue to receive the same long distance services, under the same rates, terms and conditions of service following the transfer to Legent Comm. The Parties have notified all affected customers of the proposed transfer, see the attached Customer Notice in Exhibit A, and have filed a Notification of the customer base transfer with the FCC pursuant to Section 64.1120(e)(1) of the FCC rules. The Parties propose to close the transaction upon receipt of all required regulatory approvals, including that of the Federal Communications Commission.

### **III. Public Interest Statement**

Approval of the proposed transaction will serve the public interest. As noted above, the Transaction will have no negative impact on the customers served by Protel, who will continue to receive the same long distance services at the same rates, terms and conditions. Legent Comm will notify the customers of any future changes in rates, terms and/or conditions of service consistent with applicable regulatory requirements. Based upon its experience in successfully providing resold long distance services to retail customers in the U.S. over the past 20 years, Legent Comm is well qualified to serve the customers presently served by Protel.

### **VII. CONCLUSION**

Based on the foregoing, the Applicants respectfully request that the Commission promptly grant this Joint Application and cancel Protel Advantage, Inc.'s authority.

Respectfully submitted,

/s/Sharon Thomas

Sharon Thomas, Consultant  
Inteserra Consulting Group, Inc.  
151 Southhall Lane, Suite 450  
Maitland, FL 32751  
Phone: (407) 740-3031  
Fax: (407) 740-0613  
E-Mail: sthomas@inteserra.com

EXHIBIT A  
CUSTOMER NOTICE

**Acquiring Carrier**  
Legent Comm LLC  
d/b/a Long Distance America d/b/a Long Distance Services  
10161 Park Run Drive, Suite 150  
Las Vegas, NV 89145  
USA

**Selling Carrier**  
Protel Advantage, Inc. d/b/a Long Distance Savings

USA

## **NOTICE OF CHANGE IN SERVICE PROVIDER**

On September 1, 2021, Legent Comm LLC d/b/a Long Distance America d/b/a Long Distance Services ("Legent") will become your new provider of long-distance telecommunications services currently provided by Protel Advantage, Inc. d/b/a Long Distance Savings ("LDS") pending regulatory approval.

The transfer of the services to Legent will include a seamless transition that will not affect the current rates or the terms and conditions of your telecommunications services.

In the event of any future changes to the services, rates, or terms and conditions, Legent will notify affected customers pursuant to applicable state and federal rules and law.

You have a right to select a different preferred carrier for your long-distance telecommunication services. Legent does not anticipate that this transition will cause you to incur any carrier change charges, but if you do, Legent will pay the carrier change charges associated with the transfer.

The services will be transferred to Legent, even if you have arranged preferred carrier freezes through your local service providers on the services involved in the transfer, unless you select a different carrier before the transfer date. If you have a preferred carrier freeze on your account for long distance services, it will be lifted. You must contact your local service provider if you would like to arrange new preferred carrier freezes.

Legent will be responsible for handling complaints filed, or otherwise raised, prior to or during the transfer relative to both LDS and Legent.

The toll-free customer service telephone number of Legent is 1-866-469-0829. Until the date of transfer, customers may continue to contact LDS' customer service support line at 1- 888-476-9608.

Legent Comm LLC

## VERIFICATION

I, Scott A. White, state under penalty of perjury that I am the Managing Member of Legent Comm LLC (the "Company"); that I am authorized to make this Verification on behalf of the Company; that I have read the foregoing document; and that any statements in the foregoing document with respect to the Company, except as otherwise specifically attributed, are true and correct to the best of my knowledge, information, and belief.

Executed on: October 4, 2021

A handwritten signature in dark ink, appearing to read "S. A. White", written over a horizontal line.

Name: Scott A. White  
Title: Managing Member

## VERIFICATION

I, Derek Lee, state under penalty of perjury that I am the President of Protel Advantage, Inc. (the "Company"); that I am authorized to make this Verification on behalf of the Company; that I have read the foregoing document; and that any statements in the foregoing document with respect to the Company, except as otherwise specifically attributed, are true and correct to the best of my knowledge, information, and belief.

Executed on: 10/8/21



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Name: Derek Lee  
Title: President