

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

Joint Notice of Internal Reorganization of

BullsEye Telecom, Inc.

and

**Lingo Telecom, LLC
d/b/a Trinsic Communications d/b/a VarTec Telecom
d/b/a Excel Telecommunications d/b/a Impact Telecom d/b/a Startec
d/b/a Americatel d/b/a Lingo
d/b/a Bullseye**

and

Transfer of Customers

Lingo Telecom, LLC d/b/a Trinsic Communications d/b/a VarTec Telecom d/b/a Excel Telecommunications d/b/a Impact Telecom d/b/a Startec d/b/a Americatel d/b/a Lingo d/b/a Bullseye ("Lingo Telecom") and BullsEye Telecom, Inc. ("BullsEye"), collectively the "Parties", hereby provide notice to the Washington Utilities and Transportation Commission ("Commission") of an internal reorganization that will result in (1) a planned transfer of customers from BullsEye to its affiliate Lingo Telecom effective July 1, 2023 and (2) the cancelation of the Washington telecommunications authority ("Authority") of BullsEye upon completion of the customer transfer. Following completion of the customer transfer, BullsEye will no longer operate within Washington and a request will be submitted to the Commission to cancel the Authority of Bullseye.

I. The Parties

BullsEye is a Michigan corporation formed on March 4, 1997. Its principal office is located at 25925 Telegraph Road, Suite 210, Southfield, MI 48033. In Washington, Bullseye is authorized as a competitive telecommunications carrier, UTC 41856. BullsEye is a direct subsidiary of Lingo Management, LLC ("Lingo") and an indirect subsidiary of Lingo Communications, LLC and B. Riley Principal Investments, LLC.

Lingo Telecom is a Texas limited liability company originally incorporated on June 13, 1990 as Matrix Telecom, Inc. and converted to a limited liability company on December 28, 2015. Its principal office is located at 25925 Telegraph Road, Suite 210, Southfield, MI 48033. In Washington, Lingo Telecom was authorized as a competitive telecommunications carrier in Docket Nos. UT-910020 and UT-030675. Lingo Telecom is a direct subsidiary of Impact Telecom, LLC and an indirect subsidiary of Lingo, Lingo Communications, LLC, and B. Riley Principal Investments, LLC.

II. The Transaction

As part of an internal corporate reorganization, the Washington customers of BullsEye are set to transfer to its affiliate Lingo Telecom on July 1, 2023. This is a *pro forma* assignment of customers between two affiliates with the same entities holding the controlling interest in both Bullseye and Lingo Telecom. Exhibit A contains an overview of the corporate structure of Lingo and its subsidiaries prior to and upon completion of the merger and transfer of customers.

Following the transfer, BullsEye customers will be served by Lingo Telecom and BullsEye will no longer operate within Washington.

A notice of consummation and request for cancellation of the telecommunications Authority of BullsEye will be submitted to the Commission upon completion of the customer transfer.

III. Customer Impact

BullsEye provides service to contracted enterprise business customers only. The transition from BullsEye to Lingo Telecom, which operates under the trade name of “Bullseye”, will be transparent. BullsEye customers will not incur any charges or immediate changes to services, terms and conditions, or rates as a result of the transfer to BullsEye’s affiliate, Lingo Telecom. Following the customer transfer BullsEye customer invoices will continue to be issued under the BullsEye brand. Included as Exhibit B is a copy of the customer notice being provided to the Washington customers of BullsEye.

IV. Contact Information

Correspondence with regard to this filing should be sent to:

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with a copy sent to

Alex Valencia
Chief Compliance Officer
Lingo Telecom, LLC and BullsEye Telecom, Inc.
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Facsimile: 866-418-9750
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V. Public Interest Statement

The proposed customer transfer is an internal corporate reorganization that will reduce costs and provide enhanced operational and economic efficiencies. The resulting savings will provide greater opportunities to improve the services available to Washington customers. Consequently, this transaction is consistent with the public interest.

For the reasons stated above, Lingo Telecom and BullsEye submit that the public interest, convenience and necessity would be furthered by this transaction and respectfully request approval, to the extent necessary, of the internal reorganization and transfer of customers from BullsEye Telecom, Inc. to its affiliate Lingo Telecom, LLC effective July 1, 2023.

Respectfully submitted on behalf of the Parties,

/s/ Carey Roesel

Carey Roesel, Consultant

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Lingo Telecom, LLC

BullsEye Telecom, Inc.

Exhibit A
Corporate Structure

Exhibit A-1 - Pre-Consolidation

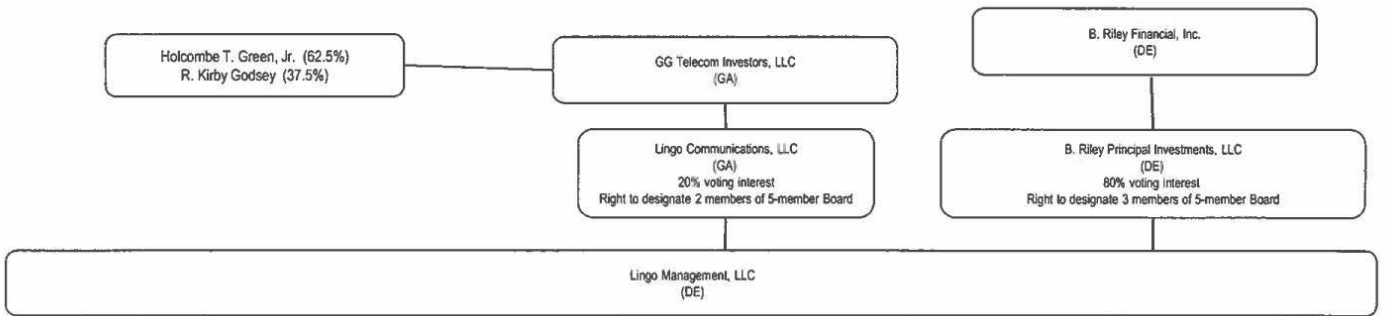


Exhibit A-2 - Pre-Consolidation

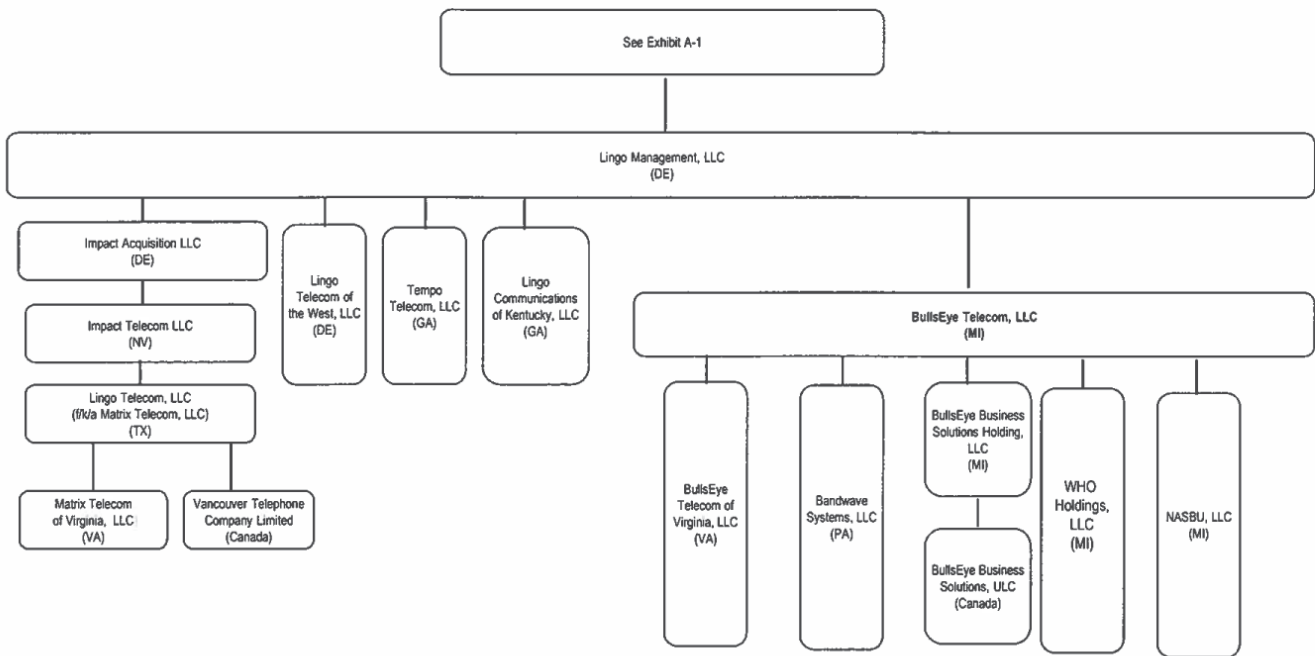
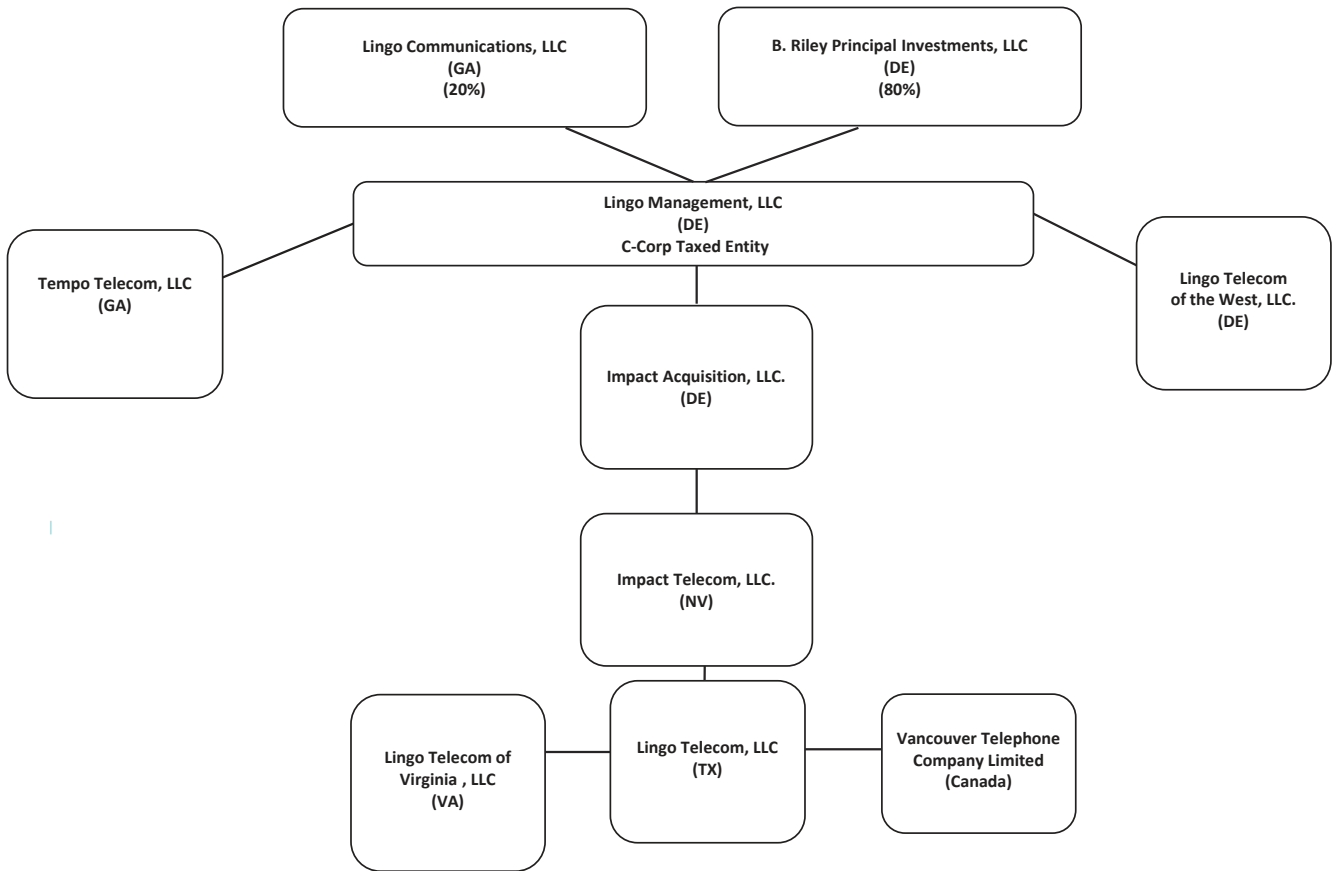


Exhibit A-3 Post-Consolidation



Lingo Telecom, LLC

BullsEye Telecom, Inc.

Exhibit B
Customer Notice

Customer Notice – Transfer of customers from BullsEye Telecom, Inc. to Lingo Telecom, LLC d/b/a BullsEye.

Please note that your BullsEye services will be provided by Lingo Telecom, LLC d/b/a BullsEye effective July 1, 2023. There will be no charges due to this change and no changes to your service, terms and conditions or rates. You may find all applicable terms and conditions of service and tariffs, located at <https://www.lingo.com/legal>. You have the right to select a different company to provide your services. Your service will be transferred even if you have selected a “freeze” on company choices unless you select a different company prior to the transfer date. If you have a “freeze” on company choices, the freeze will be lifted at the time of the transfer and you will need to “refreeze” company choices. If you have any unresolved question or complaint related to this transition, please contact us at 888-411-0111 or the Washington Utilities and Transportation Commission at 888-333-9882 or via email at consumer@utc.wa.gov.