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READ INSTRUCTIONS CAREFULLY  
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION  
REMITTANCE ADVICE  
FORM 159

Approved by OMB  
3060-0589  
Page No. 1 of 1

(1) LOCKBOX # 979091		SPECIAL USE ONLY	
		FCC USE ONLY	
<b>SECTION A - PAYER INFORMATION</b>			
(2) PAYER NAME (if paying by credit card enter name exactly as it appears on the card) <b>Davis Wright Tremaine, LLP</b>		(3) TOTAL AMOUNT PAID (U.S. Dollars and cents) <b>\$1,050.00</b>	
(4) STREET ADDRESS LINE NO. 1 <b>1919 Pennsylvania Ave., NW</b>			
(5) STREET ADDRESS LINE NO. 2 <b>Suite 800</b>			
(6) CITY <b>Washington</b>		(7) STATE <b>DC</b>	(8) ZIP CODE <b>20006-3402</b>
(9) DAYTIME TELEPHONE NUMBER (include area code) <b>202-973-4200</b>		(10) COUNTRY CODE (if not in U.S.A.)	
<b>FCC REGISTRATION NUMBER (FRN) REQUIRED</b>			
(11) PAYER (FRN) <b>0004063681</b>		(12) FCC USE ONLY	
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C) COMPLETE SECTION BELOW FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET			
(13) APPLICANT NAME <b>Four Star Marketing, LLC d/b/a/ Mid-South Home Phone</b>			
(14) STREET ADDRESS LINE NO. 1 <b>6565 N. Quail Hollow Dr.</b>			
(15) STREET ADDRESS LINE NO. 2 <b>Suite 200</b>			
(16) CITY <b>Memphis</b>		(17) STATE <b>TN</b>	(18) ZIP CODE <b>38120</b>
(19) DAYTIME TELEPHONE NUMBER (include area code) <b>901-271-3727</b>		(20) COUNTRY CODE (if not in U.S.A.)	
<b>FCC REGISTRATION NUMBER (FRN) REQUIRED</b>			
(21) APPLICANT (FRN) <b>0019697200</b>		(22) FCC USE ONLY	
COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET			
(23A) CALL SIGN/OTHER ID	(24A) PAYMENT TYPE CODE <b>CDT</b>	(25A) QUANTITY <b>1</b>	
(26A) FEE DUE FOR (PTC) <b>\$1,050.00</b>	(27A) TOTAL FEE <b>\$1,050.00</b>	FCC USE ONLY	
(28A) FCC CODE 1		(29A) FCC CODE 2	
(23B) CALL SIGN/OTHER ID	(24B) PAYMENT TYPE CODE	(25B) QUANTITY	
(26B) FEE DUE FOR (PTC)	(27B) TOTAL FEE	FCC USE ONLY	
(28B) FCC CODE 1	(29B) FCC CODE 2		

**PAID BY CREDIT CARD**

**PAID BY CREDIT CARD**

**COPY**

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

In the Matter of the Application of

Pittco Capital Partners IV, LP,  
Ben Bryant,  
Ronald Brent Ragin, and  
Kennith White, Transferors,

WCB Docket No. \_\_\_\_\_

Four Star Marketing, LLC d/b/a Mid-South Home Phone,  
and

MSK Communications, LLC Transferee

For grant of authority pursuant to Section 214 of the  
Communications Act of 1934, as amended, and Sections  
63.04 and 63.24 of the Commission's Rules to Transfer  
Control of Licensee

**APPLICATION**

**I. INTRODUCTION**

**A. Summary of Transaction**

Pursuant to Section 214 of the Communications Act, as amended,<sup>1</sup> and Section 63.04 of the Commission's rules,<sup>2</sup> Pittco Capital Partners IV, LP, Ben Bryant, Ronald Brent Ragin, and Kennith White ("Transferors"), MSK Communications, LLC ("Transferee"), and Four Star Marketing, LLC d/b/a Mid-South Home Phone ("Licensee") (collectively, "Applicants"), respectfully request Commission approval to transfer control of the Licensee to Transferee. Licensee is a non-dominant carrier holding blanket domestic Section 214 authorization from the

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<sup>1</sup> 47 U.S.C. § 214.

<sup>2</sup> 47 C.F.R. § 63.04.

Commission to provide interstate telecommunications services under Section 63.01 of the Commission's rules.<sup>3</sup>

**B. Request for Streamlined Processing**

Applicants respectfully submit that this application is eligible for presumptive streamlined processing with respect to Licensee's domestic 214 authorization under Section 63.03(b)(1)(i) of the Commission's rules because none of the Applicants are facilities-based carriers.<sup>4</sup>

**II. DESCRIPTION OF THE APPLICANTS**

**A. Transferors and Licensee**

Transferors: Transferors, Pittco Capital Partners IV, LP, Ben Bryant, Ronald Brent Ragin, and Kenneth White, are investors that hold a collective 82.28% in ownership interests of the Licensee. The remaining owners are individuals who each hold less than a 10% interest in Licensee.

Licensee: The Licensee provides competitive local exchange and interexchange services in Mississippi and Tennessee. It also holds authorizations in Kentucky and Louisiana but has not yet begun providing services in those states.

**B. Transferee**

Transferee, a Tennessee limited liability company, is 100% directly owned by Mr. Min-su Kang. Mr. Kang is a United States citizen that has investments in multiple lines of business,

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<sup>3</sup> 47 C.F.R. § 63.01.

<sup>4</sup> 47 C.F.R. § 63.03(b)(1)(i).

including telecommunications and debt resolution. Upon close of the proposed transaction, Transferee would directly own 100% of the stock of Licensee.

### **III. DESCRIPTION OF THE TRANSACTION**

Transferors seek to transfer 100% ownership of Licensee to Transferee pursuant to an agreement between the Transferors and the Transferee. The closing of the transaction is contingent on receiving all necessary state and federal approvals, including the approval of this Commission.

### **IV. PUBLIC INTEREST STATEMENT**

Approval of this Application is in the public interest because it will assure the continued lawful management of Licensee, who provides competitive local exchange service in four states. There will be no interruption of service to the end users as the day-to-day management of the Licensee will continue to be handled by the same personnel.

### **V. INFORMATION REQUIRED UNDER SECTION 63.04(a)**

Applicants submit the following information required under Section 63.04(a) of the Commission's rules in support of their application.

**(1) Name, address, and telephone number of each Applicant**

Transferors

Pittco Capital Partners IV, LP  
17 W. Pontotoc Avenue, Suite 100  
Memphis, TN 38103  
(901) 685-5455

Ben Bryant  
3440 Pine Brake Cove  
Memphis, TN 38125  
(901) 277-1365

Ronald Brent Ragin  
1337 Warford Street  
Memphis, TN 38108  
(901) 494-3574

Kennith White  
PO Box 576  
East Ellijay, GA 30539  
(404) 626-7536

Licensee

Four Star Marketing, LLC d/b/a Mid-South      FRN: 0019697200  
Home Phone  
6565 N. Quail Hollow Dr. Suite 200  
Memphis, TN 38120  
(901) 271-3727

Transferee

MSK Communications, LLC  
1027 S. Yates Road # 2  
Memphis, TN 38119-3707  
(901) 581-8222

**(2) The Government, State, or Territory under the laws of which each corporate or partnership applicant is organized**

Transferors

Pittco Capital Partners IV, LP

Tennessee

Ben Bryant

U.S. citizen

Ronald Brent Ragin

U.S. citizen

Kennith White

U.S. citizen

Licensee

Four Star Marketing, LLC d/b/a Mid-South  
Home Phone

Tennessee limited liability company

Transferee

MSK Communications, LLC

Tennessee limited liability company

**(3) 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.**

Transferors and Licensee

Danielle Frappier  
Legal Counsel  
Davis Wright Tremaine LLP  
1919 Pennsylvania Avenue NW Suite 800  
Washington, DC 20006-3401  
Tel: (202) 973-4200  
Fax: (202) 973-4499  
daniellefrappier@dwt.com

With copies to

James Joseph Black, Jr.  
Chief Operating Officer  
Four Star Marketing, LLC d/b/a Mid-South  
6565 N. Quail Hollow Dr. Suite 200  
Memphis, TN 38120  
(901) 271-3727  
jblack@midsouthhomephone.com

Transferee

Danielle Frappier  
Legal Counsel  
Davis Wright Tremaine LLP  
1919 Pennsylvania Avenue NW Suite 800  
Washington, DC 20006-3401  
Tel: (202) 973-4200  
Fax: (202) 973-4499  
daniellefrappier@dwt.com

With copies to

Min-su Kang  
MSK Communications, LLC  
1027 S. Yates Road # 2  
Memphis, TN 38119-3707  
mtkang08@gmail.com

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

The Transferee, MSK Communications, LLC, is a Tennessee limited liability company. It was created for the purpose of holding the interests of Licensee. Mr. Kang's principal business is debt resolution. The business address for Transferee and Mr. Kang is address is 8181 Short Grass Cove, Arlington, Tennessee 38002.

**(5) A 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. 853a.**

Applicants certify, as evidenced by the signatures in the attached certifications, that no Applicant is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1998.

**(6) A description of the transaction.**

Please see a description of the transaction at Section III above.

**(7) A description of the geographic areas in which the Transferors and transferee (and their affiliates) offer domestic telecommunications services, and what services are provided in each area.**

Neither Transferors nor Transferee provide telecommunications services. The Licensee provides competitive local exchange services and interexchange services in Mississippi and Tennessee, and holds authorizations in Kentucky and Louisiana. The Licensee has no affiliates that provide telecommunications services. Mr. Kang, the 100% direct owner of Transferee, owns RightLink USA, Inc. ("RightLink"), a competitive local exchange carrier providing local and long distance services in Florida.<sup>5</sup> Mr. Kang also recently applied for authority to acquire

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<sup>5</sup> Mr. Kang controls RightLink USA, Inc. ("RightLink") by virtue of an unauthorized transfer of control that was consummated prematurely in the spring of 2012, as has been discussed with

100% of an entity called Capital Communications Consultants, Inc. (“CapCom”), which is the subject of a separate, unrelated transaction.<sup>6</sup> Upon approval and closing of that transaction as well as the present transaction, RightLink, CapCom and Licensee would be affiliates through Mr. Kang’s 100% ownership of the entities (*i.e.*, 100% direct ownership of CapCom and RightLink, and 100% indirect ownership of the Licensee named in the present application). As explained in the CapCom application, CapCom provides local exchange and interexchange services in Alabama, Georgia, Kentucky, Louisiana, and South Carolina; it holds local and interexchange authority in North Carolina but does not yet provide services in that state.

**(8) A statement as to how the application fits into one or more of the presumptive streamlined categories in this section or why it is otherwise appropriate for streamlined treatment.**

Applicants respectfully submit that this application is eligible for presumptive streamlined processing with respect to Licensee’s domestic 214 authorization under Section 63.03(b)(1)(i) of the Commission’s rules because none of the Applicants are facilities-based carriers.<sup>7</sup>

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

None. But please see response to question 7 above.

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staff. The carrier serves a very small number of end users. RightLink will file for the requisite special temporary authority as well as a revised application for approval of the transfer of RightLink.

<sup>6</sup> *In Re Application of Estate of Bryan Michael, Transferor, Capital Communications Consultants, Inc., Licensee, and Min-su Kang, Transferee, for Grant of Authority Pursuant to Section 214 of the Communications Act of 1934, as amended, and Sections 63.04 and 63.24 of the Commission’s Rules to Transfer Control of Licensee*, Application, Docket 12-244 (filed Aug. 28, 2012).

<sup>7</sup> 47 C.F.R. § 63.03(b)(1)(i).



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

Not applicable.

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

None.

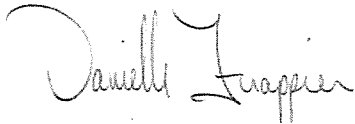
**(12) A statement showing how grant of the application will serve the public interest, convenience and necessity, including any additional information that may be necessary to show the effect of the proposed transaction on competition in domestic markets.**

Please see Applicants' public interest statement in Section IV above.

**VI. CONCLUSION**

For the reasons stated above, Applicants respectfully submit that the public interest, convenience and necessity would be furthered by a grant of this application.

Respectfully submitted,



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Davis Wright Tremaine LLP  
1919 Pennsylvania Avenue NW Suite 800  
Washington, DC 20006-3401  
Tel: (202) 973-4200  
[daniellefrappier@dwt.com](mailto:daniellefrappier@dwt.com)

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*Counsel for Four Star Marketing, LLC*

*Counsel for Min-su Kang, Transferee*

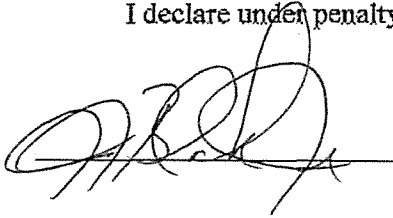
Dated: October 4, 2012

## CERTIFICATIONS

**CERTIFICATION**

I, James Joseph Black, Jr. am the Chief Operating Officer of Four Star Marketing, LLC d/b/a Mid-South Home Phone ("Mid-South"), that I am authorized to make this certification on behalf of Mid-South, and that the contents of the foregoing application with respect to these entities 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.



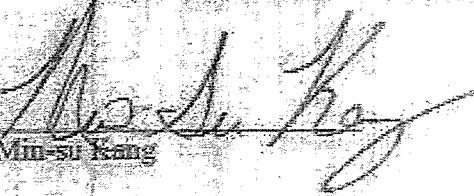
Date:

10/1/12

CERTIFICATION

I, Min-su Kang, state that I am the sole member of Transferee in the proposed transaction and the contents of the foregoing application 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.

  
Min-su Kang

Date: 9-28-12