



PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: <http://www.fcc.gov>
TTY: 1-888-835-5322

DA 20-565
May 28, 2020

**DOMESTIC SECTION 214 APPLICATION FILED FOR THE TRANSFER OF CONTROL
OF TAG MOBILE BANKRUPTCY SALE ENTITY, LLC
TO VECTOR HOLDINGS GROUP LLC**

NON-STREAMLINED PLEADING CYCLE ESTABLISHED

WC Docket No. 20-140

Comments Due: June 11, 2020
Reply Comments Due: June 18, 2020

By this Public Notice, the Wireline Competition Bureau seeks comment from interested parties on an application filed by TAG Mobile, LLC (TAG Mobile), TAG Mobile Bankruptcy Sale Entity, LLC (TAG Bankruptcy Entity), and Vector Holdings Group LLC (Vector) (collectively, Applicants), pursuant to section 214 of the Communications Act of 1934, as amended, and sections 63.03-04 of the Commission's rules, requesting consent to transfer control of TAG Bankruptcy Entity to Vector.¹

TAG Mobile, a Texas limited liability company, provides resold domestic interexchange services and wireless commercial mobile radio service to customers in multiple states in which it has been designated as an eligible telecommunications carrier (ETC) to provide Lifeline services. TAG

¹ See 47 U.S.C. § 214; 47 CFR §§ 63.03-04. Application for Approval of a Transfer Control of TAG Mobile, LLC, WC Docket No. 20-140 (filed May 12, 2020) (Application). Applicants also filed an application for the transfer of authorizations associated with international authorizations. Any action on this domestic section 214 application is without prejudice to Federal Communications Commission (Commission) action on other related, pending applications, including any necessary approvals related to Applicants' compliance with the Commission's Lifeline rules and requirements.

Bankruptcy Entity, a Texas limited liability company, was formed for the purposes of the proposed transaction and is wholly owned by TAG Mobile.²

Vector, a Delaware limited liability company, was created for this proposed transaction and currently has no operations. Vector is wholly owned by Quadrant Holdings Group LLC (Quadrant), a U.S. corporation, which, in turn, is wholly owned by Issa Asad, a U.S. citizen. Quadrant wholly owns Q Link Wireless, LLC, which provides services as an ETC to provide Lifeline service in multiple states.³

Pursuant to the terms of the membership purchase agreement, TAG Mobile will transfer all of its regulated assets, including customers and section 214 authorizations, to TAG Bankruptcy Entity, and Vector will subsequently purchase 100% of the membership interests of TAG Bankruptcy Entity. The Applicants state that the proposed transaction will be transparent to TAG Mobile's customers and will not result in any loss or impairment of service for any customer. Applicants assert that a grant of the application would serve the public interest, convenience, and necessity. Because the transaction is more complex than usual, in order to analyze whether the proposed transaction would serve the public interest, this application will not be streamlined.⁴

Domestic Section 214 Application Filed for the Transfer of Control of TAG Mobile Bankruptcy Sale Entity, LLC to Vector Holdings Group LLC, WC Docket No. 20-140 (filed May 12, 2020).

GENERAL INFORMATION

The application identified herein has been found, upon initial review, to be acceptable for filing. The Commission reserves the right to return any application if, upon further examination, it is determined to be defective and not in conformance with the Commission's rules and policies.

Interested parties may file comments and petitions **on or June 11, 2020** and reply comments or oppositions to petitions **on or before June 18, 2020**. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS) or by paper. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

- Electronic Filers: Comments may be filed electronically by accessing ECFS at <http://apps.fcc.gov/ecfs/>.

² On October 5, 2017, TAG Mobile's creditors filed an involuntary petition for relief under Chapter 7 of Title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* United States Bankruptcy Court for the Northern District of Texas (Bankruptcy Court), Dallas Division, Case No. 17-33791-sgi-11. The Bankruptcy Court subsequently assigned TAG Mobile a Trustee, Robert Yaquinto, Jr., and authorized TAG Mobile to form TAG Bankruptcy Entity and to transfer the regulated assets of TAG Mobile to TAG Bankruptcy Entity. On May 8, 2020, the Bankruptcy Court issued an order approving a motion filed by the Trustee for the Bankruptcy Court to approve the proposed transaction, subject to necessary regulatory approvals by the Commission. *See* Application at Exh. B at 15 (Sale Order).

³ Applicants provided a more complete description of their operating affiliates in their Application. Application at Exh.A.

⁴ 47 CFR § 63.03(c)(1)(v).

- *Paper Filers:* Parties who choose to file by paper must file an original and one copy of each filing. If more than one docket or rulemaking number appears in the caption of this proceeding, filers must submit two additional copies for each additional docket or rulemaking number.
 - Filings can be sent by commercial overnight courier or by first-class or overnight U.S. Postal Service mail.⁵ All filings must be addressed to the Commission’s Secretary, Office of the Secretary, Federal Communications Commission.
 - Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
 - U.S. Postal Service first-class, Express, and Priority mail must be addressed to 445 12th Street, SW, Washington, DC 20554.

People with Disabilities: To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at 202-418-0530 (voice), 1-888-835-5322 (tty).

In addition, e-mail one copy of each pleading to each of the following:

- 1) Tracey Wilson, Competition Policy Division, Wireline Competition Bureau, tracey.wilson@fcc.gov;
- 2) Dennis Johnson, Competition Policy Division, Wireline Competition Bureau, dennis.johnson@fcc.gov;
- 3) Sumita Mukhoty, Policy Division, International Bureau, smita.mukhoty@fcc.gov;
- 4) David Krech, Policy Division, International Bureau, david.krech@fcc.gov; and
- 5) Jim Bird, Office of General Counsel, jim.bird@fcc.gov.

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The proceeding in this Notice shall be treated as a “permit-but-disclose” proceeding in accordance with the Commission’s *ex parte* rules. Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two

⁵ In response to the COVID-19 pandemic, the FCC has closed its current hand-delivery filing location at FCC Headquarters. We encourage outside parties to take full advantage of the Commission’s electronic filing system. Any party that is unable to meet the filing deadline due to the building closure may request a waiver of the comment or reply comment deadline, to the extent permitted by law. *FCC Announces Closure of FCC Headquarters Open Window and Change in Hand-Delivery Filing*, Public Notice, DA 20-304 (rel. Mar. 19, 2020). <https://www.fcc.gov/document/fcc-closes-headquarters-open-window-and-changes-hand-delivery-policy>.

business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter's written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with rule 1.1206(b), 47 CFR § 1.1206(b). Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules.

To allow the Commission to consider fully all substantive issues regarding the application in as timely and efficient a manner as possible, petitioners and commenters should raise all issues in their initial filings. New issues may not be raised in responses or replies.⁶ A party or interested person seeking to raise a new issue after the pleading cycle has closed must show good cause why it was not possible for it to have raised the issue previously. Submissions after the pleading cycle has closed that seek to raise new issues based on new facts or newly discovered facts should be filed within 15 days after such facts are discovered. Absent such a showing of good cause, any issues not timely raised may be disregarded by the Commission.

For further information, please contact Tracey Wilson at (202) 418-1394 or Dennis Johnson at (202) 418-0809.

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⁶ See 47 CFR § 1.45(c).