

October 11, 2019

VIA ELECTRONIC FILING

Kristi Collins, Commission Secretary
Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, Oregon 97301-3398

RE: CallCatchers, Inc. d/b/a FreedomVoice Systems – Request to Cancel Certificate of Authority and Withdraw Tariff by Letter

Dear Ms. Collins,

On behalf of CallCatchers, Inc. d/b/a FreedomVoice Systems (“FreedomVoice” or “the Company”), undersigned counsel hereby submits the Company’s request to voluntarily surrender its Certificate of Authority (“Certificate” or “IXC License”) and withdraw any Company tariff on record, effective as soon as possible. At the time of this filing, and to the best of its knowledge, FreedomVoice is in good standing before the Commission and current with its regulatory compliance obligations (including annual reports and payment of regulatory fees).

FreedomVoice was granted a Certificate to provide Resold Interexchange Telecommunications services in the state of Oregon on the August 1, 2016 in Order No. 16-287 (Docket No. CP-1600).

In 2016, the Company was acquired by Media Temple, Inc., an affiliate of GoDaddy.com LLC (“GoDaddy”).¹ GoDaddy, an affiliate of FreedomVoice, is also licensed by this Commission to provide Resold Interexchange Telecommunications services, pursuant to Order No. 16-353 (Docket No. CP-1602). At the time of this filing, and to the best of its knowledge, GoDaddy is also in good standing and current with its regulatory compliance obligations.

Since the acquisition nearly three years ago, FreedomVoice has continued to operate as a wholly owned subsidiary of GoDaddy Inc. Throughout this period, FreedomVoice has provided service to consumers alongside the “GoDaddy” brand, as “FreedomVoice-A GoDaddy Company.”

As the Commission was notified at the time of the merger, all FreedomVoice assets and operations, including its IXC License, have been assigned to GoDaddy.com, LLC as part of an intracompany, operational reorganization that now renders FreedomVoice’s IXC License superfluous and unnecessary.

As of September 1, 2019, GoDaddy and FreedomVoice completed the final step in the previously approved transaction by implementing associated accounting and operational changes whereby all revenue previously reported on the books of FreedomVoice are now being reflected in its affiliate GoDaddy’s

¹ All three legal entities referenced herein (Media Temple, GoDaddy.com LLC, and FreedomVoice) are subsidiaries of GoDaddy Inc.

accounting. Likewise, as of September 1, 2019, GoDaddy began reporting all intrastate telecommunications revenue on a consolidated basis under its affiliate GoDaddy.com LLC. GoDaddy will therefore file future regulatory reports and remit associated regulatory fees in association with the IXC License issued by the Commission to GoDaddy.

The continued retention and maintenance of FreedomVoice's IXC License would impose unnecessary and duplicative administrative costs on GoDaddy, which the Company seeks to mitigate through this request to voluntarily surrender the IXC License issued to FreedomVoice.

The operational integration described above and the Company's request to voluntarily surrender FreedomVoice's IXC License (and withdraw any associated tariff) will not impact consumers. All services will continue to be provided in exactly the same manner as they were before September 1, 2019. Services will remain co-branded under the GoDaddy name and service mark. The changes triggering FreedomVoice's request to surrender its IXC License result from the full assimilation of FreedomVoice's operations, systems and assets into GoDaddy and are reflective of internal bookkeeping consolidation (changes to accounting and reporting).

The public convenience and necessity will not be adversely affected by FreedomVoice's request to voluntarily surrender its IXC License, as there will be no perceptible change in customer experience from the accounting changes and operational assignments implemented as of September 1, 2019. Customers whose revenue had previously been recorded in FreedomVoice's books are now being recorded in GoDaddy's. And all revenue previously reported to the Commission by FreedomVoice will now be reported by GoDaddy.

To the best of its knowledge, the Company is current on all reporting and fee remittance obligations and, to the extent it is determined reports or fees are due prior to the cancellation of its IXC License, the Company is committed to ensuring prompt resolution.

For all these reasons, FreedomVoice hereby requests the Commission effect the cancellation and withdrawal of its now superfluous, redundant Certificate, and tariffs, if applicable, as soon as the Commission can take appropriate administrative action.

Any questions you may have regarding this filing should be directed to my attention at (703) 714-1313 or by email to jsm@commlawgroup.com. Thank you for your assistance in this matter.

Respectfully submitted,



Jonathan S. Marashlian
Counsel for FreedomVoice and GoDaddy