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December 1, 2022  
**Via Web Filing**

Mr. Michael Dougherty, Executive Director  
Oregon Public Utility Commission  
201 High Street SE  
Suite 100  
Salem, OR 97301-3398

**RE: Flash Wireless, LLC  
Notice of Corporate Reorganization**

Dear Mr. Dougherty:

Please accept this letter submitted on behalf of Flash Wireless, LLC ("Flash" or "Company"). Flash and its affiliate, ACN Communication Services, LLC ("ACN") are undertaking a corporate reorganization expected to be completed on January 1, 2023, whereby Flash will be consolidated into ACN and the resold wireless customers currently served by Flash will be transferred to ACN, which will service those customers under the same rates, terms and conditions. Existing customers of Flash will continue to be billed under the same brand name, making the transaction seamless to those customers.

The proposed corporate reorganization does not reflect a transfer of control, because there will be no change in the ownership or management of the company serving Flash's existing wireless customers. Following the reorganization, customers will be served by Flash's affiliate, ACN under the d/b/a of Flash Wireless or Flash Mobile.

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: ORx2201

Enclosures  
ST/kb

**Flash Wireless, LLC**  
**Notice of Corporate Reorganization and Request for Transfer of Wireless Registration**

Flash Wireless, LLC (“Flash”) and its affiliate, ACN Communication Services, LLC (“ACN”) are undertaking a corporate reorganization expected to be consummated on January 1, 2023, whereby Flash will be consolidated into ACN. Following the reorganization, Flash will no longer exist as a separate legal entity. The resold wireless customers of Flash will be transferred to ACN, which will continue to serve those customers under the same rates, terms and conditions. Existing customers of Flash will continue to be billed under the same brand name, making the transaction seamless to those customers.

The effect of this reorganization is pro forma in nature and transparent to customers. There will be no change in ultimate company ownership or management and no change to the rates, terms and conditions under which Flash’s existing customers receive service. Flash Wireless, LLC respectfully requests that the Commission transfer or reissue its wireless registration to ACN Communication Services, LLC, effective on January 1, 2023.

A description of the transaction is set forth below.

**The Companies**

Flash Wireless, LLC is a limited liability company organized under the laws of the state of Delaware in 2011. Flash’s principal business address is 1000 Progress Place, Concord, NC 28025. Flash registered with the Oregon Public Utility Commission to provide resold wireless services.

ACN Communication Services, LLC, is a limited liability company organized under the laws of the state of Michigan. ACN’s principal business address is 1000 Progress Place, Concord, NC 28025. ACN is authorized to provide competitive local exchange service and resold interexchange service in Oregon in Docket CP 1184.

Flash and ACN are affiliates, both 100% owned by LKN Communications, Inc., a Michigan corporation.

**The Transaction**

Flash Wireless, LLC (“Flash”) and its affiliate, ACN Communication Services, LLC (“ACN”) are undertaking a corporate reorganization expected to be consummated on January 1, 2023, whereby Flash will be consolidated into ACN. Following the reorganization, Flash will no longer exist as a separate legal entity and Flash’s existing wireless customers will be served by ACN. The corporate reorganization will not impact customers and service will continue under the current rates, terms, and conditions.

Upon completion of this reorganization, there will be no change to the management, corporate ownership, employees, rates, services, or other contract rights and obligations of the company serving Flash’s customer base. All the current managerial, technical, and financial resources available to Flash Wireless, LLC will remain available to ACN Communication Services, LLC. This corporate restructuring is in the public interest because it will allow ACN to achieve administrative efficiencies and potential cost savings, thus financially strengthening the company without altering its operations in any respect.

Beginning January 1, 2023, ACN Communication Services, LLC will assume responsibility for all regulatory fees and assessments associated with Flash Wireless, LLC customers.

**Conclusion**

Flash Wireless, LLC respectfully requests that the Commission transfer or reissue its wireless registration to ACN Communication Services, LLC, effective on January 1, 2023.

STATE OF NORTH CAROLINA  
COUNTY OF CABARRUS


VERIFICATION

I, Dave Stevanovski, hereby declare, under penalty of perjury, that I am President of Flash Wireless, LLC, and its affiliate ACN Communication Services; that I am authorized to make this verification on behalf of the named companies; that I have read the foregoing Petition; and that the facts stated therein are true and correct to the best of my knowledge, information and belief.



Dave Stevanovski  
President

Sworn to and subscribed before me this 30 day of November, 2022

  
Notary Public

My Commission expires:

4-22-2023

