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July 1, 2022
Via Email

Hon. Michelle Phillips, Commission Secretary
New York State Department of Public Service
Three Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

RE: Petition for Transfer of Customers of Legent Comm LLC d/b/a Long Distance Services d/b/a Long Distance America for Approval of the Transfer of Customers of X2 Comm, Inc. d/b/a DC Communications to Legent Comm LLC d/b/a Long Distance Services d/b/a Long Distance America

Dear Hon. Phillips:

Enclosed for filing please find the Petition for Transfer of Customers of Legent Comm LLC d/b/a Long Distance Services d/b/a Long Distance America for Approval of the Transfer of Customers of X2 Comm, Inc. d/b/a DC Communications to Legent Comm LLC d/b/a Long Distance Services d/b/a Long Distance America.

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. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas
Consultant

tms: NYx2204

Enclosures
ST/im

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

Petition of)
Legent Comm LLC d/b/a Long Distance Services)
d/b/a Long Distance America)
for Approval of the Transfer of Customers) Matter/Case No. _____
of X2Comm, Inc. d/b/a DC Communications)
to Legent Comm LLC d/b/a Long Distance Services)
d/b/a Long Distance America)

PETITION FOR TRANSFER OF CUSTOMERS

Pursuant to N.Y. Pub. Ser. Law §§ 99 and 100, Legent Comm LLC d/b/a Long Distance Services d/b/a Long Distance America (“Legent”) and X2Comm, Inc. d//b/a DC Communications (“X2Comm”), collectively the “Parties”, hereby seek approval, to the extent necessary, from the New York Public Service Commission (“Commission”) of a transfer of customers from X2Comm to Legent. Following the completion of the customer transfer, X2Comm will no longer operate within New York.

I. The Parties

Legent Comm LLC is a Nevada limited liability company formed on March 30, 2013 with its headquarters located at 10161 Park Run Dr., Suite 223 Las Vegas, NV 89145. The Company originally received authority to provide interexchange services in the state of New York in Case Number 01-C-1766 on December 21, 2001.

X2Comm is incorporated under the laws of the state of Nevada in 1999, with its headquarters located at 270 South Main Street, Suite C, Flemington, NJ 08822. X2Comm received authority to provide interexchange telecommunications services in the state of New York in Case Number 02-C-00242 on March 22, 2022.

II. Description of the Transaction

Pursuant to a Purchase Agreement (“Agreement”) between the Parties, X2Comm proposes to transfer its customer base of approximately 15 business and residential customers to Legent Comm, which will become the service provider for the resold long distance telecommunications services that the customers currently receive from X2Comm. Upon closing of the transaction, X2Comm will discontinue its intrastate resold long distance service offerings, and wishes to cancel its authority.

This transfer of customer base will have no adverse impact on X2Comm's customers who will continue to receive the same long distance services, under the same rates, terms and conditions of service following the transfer to Legent Comm. The Parties have notified all affected customers of the proposed transfer, see the attached Customer Notice in **Exhibit A**, and have filed a Notification of the customer base transfer with the FCC pursuant to Section 64.1120(e)(1) of the FCC rules. The Parties propose to close the transaction upon receipt of all required regulatory approvals, including that of the Federal Communications Commission.

The Parties propose to close the transaction upon receipt of all required regulatory approvals, including that of the Federal Communications Commission.

III. Public Interest Statement

Approval of the proposed transaction will serve the public interest. As noted above, the Transaction will have no negative impact on the customers served by X2Comm, who will continue to receive the same long distance services at the same rates, terms and conditions. Legent Comm will notify the customers of any future changes in rates, terms and/or conditions of service consistent with applicable regulatory requirements. Based upon its experience in successfully providing resold long distance services to retail customers in the U.S. over the past 20 years, Legent Comm is well qualified to serve the customers presently served by X2Comm.

VII. CONCLUSION

Based on the foregoing, the Applicants respectfully request that the Commission promptly grant this Joint Application and cancel X2Comm, Inc. d/b/a DC Communications' authority.

Respectfully submitted,

/s/Sharon Thomas

Sharon Thomas, Consultant
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EXHIBIT A
CUSTOMER NOTICE

Selling Carrier

X2Comm, Inc.,
d/b/a Direct Connect Communications
270 South Main Street, Suite C
Flemington, NJ 08822

Acquiring Carrier

Legent Comm LLC
d/b/a Long Distance America d/b/a Long Distance Services
10161 Park Run Drive
Las Vegas, NV 89145

NOTICE OF CHANGE IN SERVICE PROVIDER

On August 1st, 2022, Legent Comm LLC d/b/a Long Distance America d/b/a Long Distance Services ("Legent") will become your new provider of long-distance telecommunications services currently provided by X2Comm, Inc. d/b/a Direct Connect Communications ("X2 Comm") pending regulatory approval.

The transfer of the services to Legent will include a seamless transition that will not affect the current services that have been provided previously by X2 Comm.

In the event of any future changes to the services, rates, or terms and conditions, Legent will file appropriate tariff changes pursuant to state and federal rules and law, including notification to affected customers, if applicable.

You have a right to select a different preferred carrier for your long-distance telecommunication services. Legent does not anticipate that this transition will cause you to incur any carrier change charges. If you do, Legent will pay the carrier change charges associated with the transfer to Legent.

The services will be transferred to Legent, even if you have arranged preferred carrier freezes through your local service providers on the services involved in the transfer, unless you select a different carrier before the transfer date. If you have a preferred carrier freeze on your account for long distance services, it will be lifted. You must contact your local service provider if you would like to arrange new preferred carrier freezes.

Legent will be responsible for handling complaints filed, or otherwise raised, during and after the transfer relative to both X2Comm and Legent.

The toll-free customer service telephone number of Legent is 1-866-469-0829. Until the date of transfer, customers may continue to contact X2Comm's customer service support line at 1-866-330-4322.

Legent Comm LLC