



## MEMORANDUM

**TO:** Federal Communications Commission  
**FROM:** Patrick Castleberry, General Counsel, @Link Services, LLC  
**DATE:** 10 JULY 2020  
**RE:** Auction 904  
**APPLICANT:** Consortium 904

**ATTACHMENT:** Explanation and Graphical Representation of Indirect Ownership of All Disclosable Interest Holders in Applicant

Thank you for the opportunity to participate in Auction 904. Our Applicant, **Consortium 904**, consists of **three**, successful, long-standing, and legally-separate Oklahoma telephone and internet **companies**, namely, **@Link Services, LLC; Cherokee Telephone Company; and, The Hinton Telephone Company of Hinton, Oklahoma, Inc.** A textual description and a graphical representation of each company, their respective affiliates, controlling interest holders, disclosable interest holders, officers, directors, and owners, their respective common owners, and general inter-connections among the three companies appears on the following pages.

Please note that the ownership and DIH information presented herein is substantively identical to that presented by the Applicant for its Auction 105 application, Consortium 904 being composed of the same three companies that composed Oklahoma Consortium 105. We acknowledge the excellent assistance of Attorney-Advisor Valerie Barrish in completing correctly the Consortium's application for Auction 105, and particularly in the area of describing indirect ownerships, affiliations, control persons, percentages of control, etc. All of Ms. Barrish's assistance in Auction 105 is reflected in the Form 183 the Consortium presents for Auction 904.

We encourage the reviewers to feel welcome to request any additional information, financial or otherwise, needed for approval of our application to participation in Auction 904. The foregoing and following are true, accurate, and complete to the best of my knowledge and belief.

Yours very truly,

Patrick M. Castleberry, General Counsel  
@Link Services, LLC

**1. Natural Persons Who are Direct and/or Indirect Disclosable Interest Holders of Applicant:** All natural persons named as Disclosable Interest Holders (DIH) in the graphical ownership representation appearing on the following page are natural-born US citizens, and are all direct or indirect holders of voting common stock in their respective percentages and in their respective Oklahoma corporations also as appearing in the graphical ownership representation appearing on the following page. These natural persons are Samual T. Curtis, Amy Young, Jenny E. Young-Sanchez, James O. Young, Tom Young, Virginia Young, Samuel C. Sanchez, and W. O. Young. The respective home addresses of these natural persons are as set forth in each person’s DIH page appearing in the Ownership section of the Consortium’s Auction 904 Application.

**2. Natural Persons Who are Controlling Trustees of Direct and/or Indirect Disclosable Interest Holders of Applicant:** All Trusts named as Disclosable Interest Holders in the graphical ownership representation appearing on the following page are controlled by trustees who are natural persons and natural-born US citizens. All Trusts own common voting stock in their respective percentages and in their respective Oklahoma corporations as also appearing in the graphical ownership representation appearing on the final page. These Trusts are (i) the Kenneth Doughty 1994 Revocable Trust Under Agreement dated April 7, 1994, Kenneth Doughty Trustee; (ii) the Kenneth Doughty GST Exempt Residuary Trust, Kenneth Doughty, Trustee; (iii) the Jason L. Doughty 2012 Irrevocable Trust, Jason L. Doughty Trustee; (iv) the Teresa L. Treadway 2012 Irrevocable Trust, Teresa L. Treadway, Trustee; and, (v) the James R. and Amanda Hollis Family Trust Dated March 26, 2014, James R. Hollis and Amanda Hollis, Trustees. The respective addresses of these Trusts are as set forth in each Trust’s DIH page appearing in the Ownership section of the Consortium’s Auction 904 Application.

**3. @Link Services, LLC (Disclosable Interest Holder)** is a member of Consortium 904 and an Oklahoma limited liability company with a principal business address of 13431 North Broadway, Suite 120, Oklahoma City, OK 73114, which is engaged principally in the business of providing internet service and VOIP telephone service. The company’s **Members** (3) are (i) The Hinton CATV Co., Inc. – 54.39%; (ii) Communications Equipment Corporation – 33.08%; and, (iii) Samual T. Curtis – 12.53%. Its **Directors** (3) are *Kenneth Doughty, Samuel C. Sanchez, and Samual T. Curtis*. Its **Officers** (3) are: *Samual T. Curtis*, President & Manager; *Jason L. Doughty*, Vice President; and, *Samuel C. Sanchez*, Secretary/Treasurer. All Members, Directors, and Officers are Disclosable Interest Holders and are either, as the case may be, Oklahoma companies or individual Oklahoma residents and US citizens. Their respective principal business/home addresses and other required information are as set forth in each DIH’s page appearing in the Ownership section of the Consortium’s Auction 904 Application.

<b>@LINK SERVICES, LLC</b>			
<b>Members</b>	<b>O’ship %</b>	<b>Directors</b>	<b>Officers/Post</b>
The Hinton CATV Co., Inc.	54.39%	Kenneth Doughty	Kenneth Doughty, President
Communications Equipment Corporation	33.08%	Samuel C. Sanchez	Jason L. Doughty, Vice President
Samual T. Curtis	12.53%	Samual T. Curtis	Samuel C. Sanchez, Sec’y/Treasurer
	<b>100%</b>		

**4. The Hinton CATV Co., Inc. (Disclosable Interest Holder)** is an Oklahoma corporation with a principal business address of 200 West Main Street, Hinton, OK 73047, engaged principally in the business of providing cable television service. It owns a 54.39% membership interest in @Link Services, LLC. The

corporation’s voting common **Shareholders** (4) are all blood relatives or trusts whose trustees are blood relatives and are: (i) the Kenneth Doughty 1994 Revocable Trust Under Agreement dated April 7, 1994, Kenneth Doughty Trustee – 26.42%; (ii) the Kenneth Doughty GST Exempt Residuary Trust, Kenneth Doughty, Trustee – 39%; (iii) the Jason L. Doughty 2012 Irrevocable Trust, Jason L. Doughty Trustee – 17.29%; and, (iv) the Teresa L. Treadway 2012 Irrevocable Trust, Teresa L. Treadway, Trustee – 17.29%. Its **Directors** (3) are *Kenneth Doughty, Jason L. Doughty, and Teresa L. Treadway*. Its **Officers** (3) are *Kenneth Doughty*, President; *Teresa L. Treadway*, Vice President; and, *Jason L. Doughty*, Secretary/Treasurer. All Shareholder Trustees, Directors, and Officers are Disclosable Interest Holders, and are individual Oklahoma residents and US citizens. Their respective home addresses and other required information are as set forth in each DIH’s page appearing in the Ownership section of the Consortium’s Auction 904 Application.

THE HINTON CATV CO., INC.			
Shareholders	O’ship %	Directors	Officers/Post
Kenneth Doughty 1994 Revocable Trust	26.42%	Kenneth Doughty	Kenneth Doughty, President
Teresa L. Treadway 2012 Irrevocable Trust	17.29%	Teresa L. Treadway	Teresa L. Treadway, Vice President
Jason L. Doughty 2012 Irrevocable Trust	17.29%	Jason L. Doughty	Jason L. Doughty, Sec’y/Treasurer
Kenneth Doughty GST Exempt Residuary Trust	39%		
	<b>100%</b>		

**5. The Hinton Telephone Company of Hinton, Oklahoma, Inc. (Disclosable Interest Holder)** is a member of Consortium 904, and an Oklahoma corporation with a principal business address of 204 West Main Street, Hinton, OK 73047, which is engaged principally in the business of providing local, long distance, DSL, VOIP, and Lifeline telephone/internet service. It has no direct ownership interest in @Link Services, LLC, but has three shareholders in common with The Hinton CATV Co., Inc. which has a 54.39% direct member interest in @Link Services, LLC. The corporation’s voting common **Shareholders** (4) are all related by blood or marriage or are trusts whose trustees are related by blood or marriage, and are: (i) the *Kenneth Doughty 1994 Revocable Trust* Under Agreement dated April 7, 1994, Kenneth Doughty Trustee – 31%; (ii) the *Jason L. Doughty 2012 Irrevocable Trust*, Jason L. Doughty Trustee – 19.50%; (iii) the *Teresa L. Treadway 2012 Irrevocable Trust*, Teresa L. Treadway, Trustee – 19.50%; and (iv) the *James R. and Amanda Hollis Family Trust* Dated March 26, 2014, James R. Hollis and Amanda Hollis, Trustees – 30%. Its **Directors** (3) are *Kenneth Doughty, Jason L. Doughty, and Teresa L. Treadway*. Its **Officers** (3) are *Kenneth Doughty*, President; *Teresa L. Treadway*, Vice President; and, *Jason L. Doughty*, Secretary/Treasurer. All Shareholder Trustees, Directors, and Officers are Disclosable Interest Holders, and are individual Oklahoma residents and US citizens. Their respective home addresses and other required information are as set forth in each DIH’s page appearing in the Ownership section of the Consortium’s Auction 904 Application.

THE HINTON CATV CO., INC.			
Shareholders	O’ship %	Directors	Officers/Post
Kenneth Doughty 1994 Revocable Trust	31%	Kenneth Doughty	Kenneth Doughty, President
Teresa L. Treadway 2012 Irrevocable Trust	19.50%	Teresa L. Treadway	Teresa L. Treadway, Vice President
Jason L. Doughty 2012 Irrevocable Trust	19.50%	Jason L. Doughty	Jason L. Doughty, Sec’y/Treasurer
James R. & Amanda Hollis Family Trust	30%		
	<b>100%</b>		

**6. Communications Equipment Corporation (Disclosable Interest Holder)** is an Oklahoma corporation with a principal business address of 403 North Service Road, Calera, OK 74730, engaged principally in



the business of providing DSL internet access. It owns a 33.08% membership interest in @Link Services, LLC. The corporation’s voting common **Shareholders** (4) are all related by blood or marriage or are trusts whose trustees are related by blood or marriage, and are: (i) *Amy Young* – 20%; (ii) *Jenny E. Young-Sanchez* – 20%; (iii) *James O. Young Trust S* – 40%; and, (iv) *Tom Young* – 20%. Its **Directors** (3) are *Jenny E. Young-Sanchez*, *Samuel C. Sanchez*, and *James O. Young*. Its **Officers** (3) are *Jenny E. Young-Sanchez*, President; *Samuel C. Sanchez*, Vice President; and, *James O. Young*, Secretary/Treasurer. All Shareholders, Directors, and Officers are Disclosable Interest Holders, and are individual Oklahoma residents and US citizens. Their respective home addresses and other required information are as set forth in each DIH’s page appearing in the Ownership section of the Consortium’s Auction 904 Application.

COMMUNICATIONS EQUIPMENT CORPORATION			
Shareholders	O’ship %	Directors	Officers/Post
Amy Young	20%	Jenny E. Young-Sanchez	Jenny E. Young-Sanchez, President
Jenny E. Young-Sanchez	20%	Samuel C. Sanchez	Samuel C. Sanchez, Vice President
James O. Young Trust S	40%	James O. Young	James O. Young, Sec’y/Treasurer
Tom Young	20%		
	<b>100%</b>		

**7. Cherokee Telephone Company (Disclosable Interest Holder)** is an Oklahoma corporation with a principal business address of 403 North Service Road, Calera, OK 74730, engaged principally in the business of providing broadband internet access, HDTV, home telephone, and fiber transit services. It has no direct ownership interest in @Link Services, LLC, but has four shareholders in common with Communications Equipment Corporation which has a 33.08% direct member interest in @Link Services, LLC. The corporation’s voting common **Shareholders** (8) are (i) *Amy Young* – 12.89%; (ii) *Jenny E. Young-Sanchez* – 12.89%; (iii) *James O. Young Trust S* – 18.21%; (iv) *Tom Young* – 12.89%; (v) *Virginia Young* – 1.99%; (vi) *Samuel C. Sanchez* – 0.50%; (vii) *W. O. Young* – 26.47%; and, (viii) *Ruth Young Revocable Trust* – 14.18%. Its **Directors** (3) are *Jenny E. Young-Sanchez*, *Samuel C. Sanchez*, and *James O. Young*. Its **Officers** (3) are *Jenny E. Young-Sanchez*, President; *Samuel C. Sanchez*, Vice President; and, *James O. Young*, Secretary/Treasurer. All Shareholders, Directors, and Officers are Disclosable Interest Holders, and are individual Oklahoma residents and US citizens. Their respective home addresses and other required information are as set forth in each DIH’s page appearing in the Ownership section of the Consortium’s Auction 904 Application.

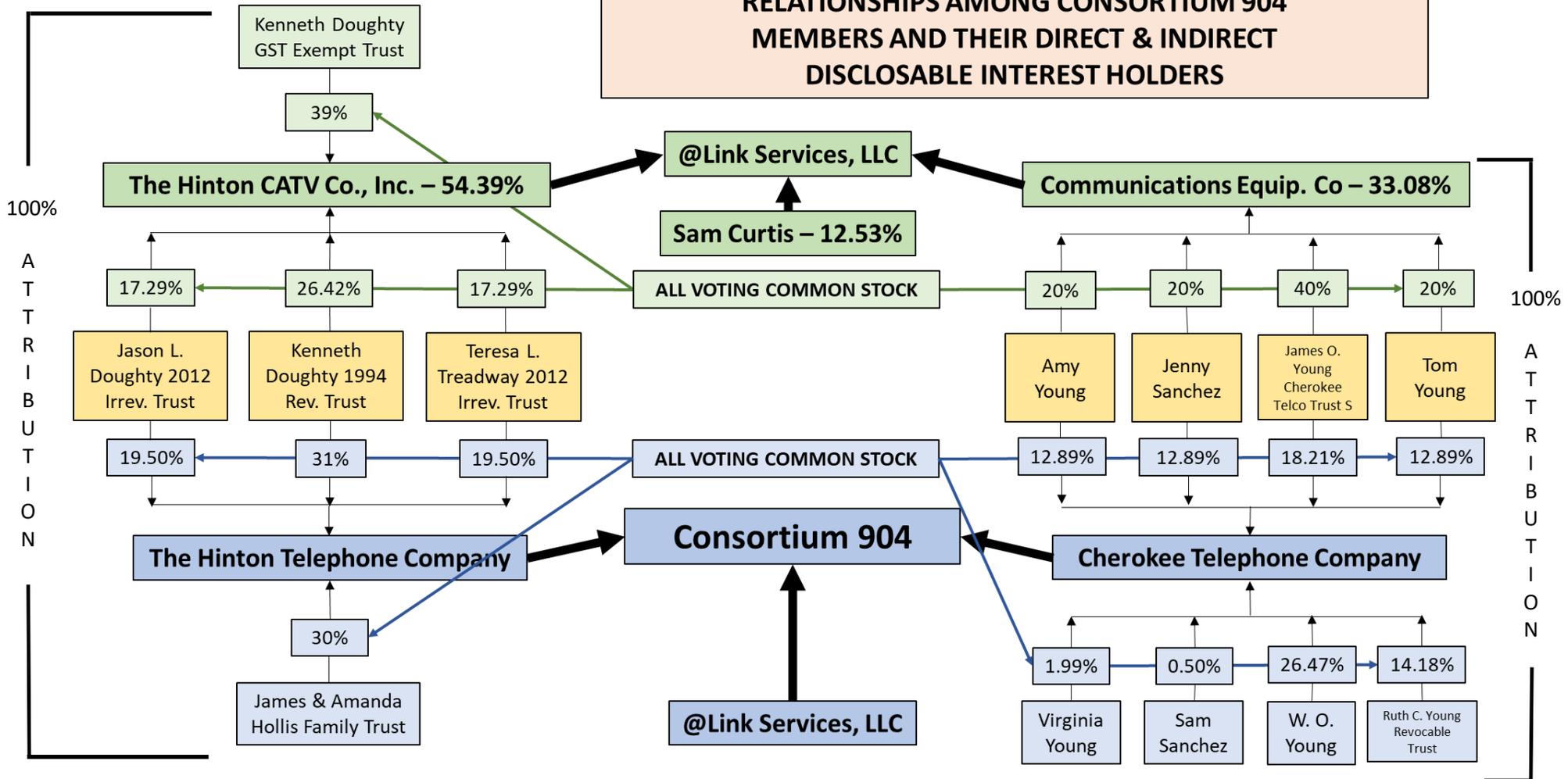
CHEROKEE TELEPHONE COMPANY			
Shareholders	O’ship %	Directors	Officers/Post
Amy Young	12.89%	Jenny E. Young-Sanchez	Jenny E. Young-Sanchez, President
Jenny E. Young-Sanchez	12.89%	Samuel C. Sanchez	Samuel C. Sanchez, Vice President
James O. Young Trust S	18.21%	James O. Young	James O. Young, Sec’y/Treasurer
Tom Young	12.89%		
Virginia Young	1.99%		
Samuel C. Sanchez	0.50%		
W. O. Young	26.47%		
Ruth Young Revocable Trust	14.18%		
	<b>100%</b>		



**8. Specialty Telecommunications Services, LLC:** Specialty Telecommunications Services, LLC is an Oklahoma professional engineering company owned 100% by Samuel T. Curtis, President & Manager of @Link Services, LLC, a member of Applicant Consortium 904. We have listed this company separately as an Affiliate of the Applicant.

**9. Terral Telephone Company:** Terral Telephone Company is an Oklahoma corporation owned 25% (voting common stock) by The Hinton CATV Company, Inc., an affiliate of The Hinton Telephone Company of Hinton, Oklahoma, Inc. through having shareholders in common, all of whom are related by blood or marriage. Applicant discloses Terral Telephone Company as an affiliate of Consortium 904 member The Hinton Telephone Company of Hinton, Oklahoma, Inc.

**RELATIONSHIPS AMONG CONSORTIUM 904 MEMBERS AND THEIR DIRECT & INDIRECT DISCLOSABLE INTEREST HOLDERS**



HCATV and Hinton Telco Shareholders all Related by Blood or Marriage

CEC and Cherokee Telco Shareholders all Related by Blood or Marriage