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**VIA ELECTRONIC FILING**

March 26, 2019

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: *Application of MNA Holdings, LLC and Bluebird Media, LLC for Approval of the Transfer of Control of Missouri Network Alliance, LLC*, WC Docket No. 19-68

Dear Ms. Dortch:

On March 11, 2019, MNA Holdings, LLC ("MNA Holdings") and Bluebird Media, LLC ("Bluebird Media," and together with MNA Holdings, "Applicants"), filed the above-referenced application for approval of the transfer of control of Missouri Network Alliance, LLC ("MNA") from MNA Holdings to Bluebird Media (the "Application").

In response to a request from the Wireline Competition Bureau, the Applicants provide additional information regarding Bluebird Media, which was established in 2010 to seek federal funding under the Broadband Technology Opportunities Program ("BTOP") for the construction of an ultra-high capacity middle mile network throughout underserved and disadvantaged areas in the State of Missouri ("Project"). After receiving a BTOP grant, Bluebird Media entered into a joint venture with MNA, described in greater detail in the Application, as a part of which Bluebird Media established a wholly owned subsidiary – Bluebird Network, LLC ("Bluebird Network") – to implement the Project and offer services consistent with Bluebird Media's BTOP grant.

Although Bluebird Media retains primary compliance responsibility as the BTOP award recipient, it is a holding company that does not offer any services to customers. Bluebird Media does not hold any authorizations at the federal or state level to offer telecommunications services to customers. Rather, Bluebird Media relies upon its affiliates – specifically, Bluebird Network and MNA – to serve customers, although MNA is the only affiliate that offers telecommunications services.

Pursuant to 47 U.S.C. § 214 and 47 C.F.R. § 63.04, Applicants respectfully request a grant of special temporary authority ("STA") to allow MNA to continue offering telecommunications services pending approval of the Application. As explained in the Application, Applicants realize that they should have filed an application for prior approval of the transfer of control of MNA's domestic Section 214 authorization resulting from the joint venture between Bluebird Media and MNA. Applicants have acted in good faith to notify the Commission of this oversight and have filed the instant Application to remedy the situation.

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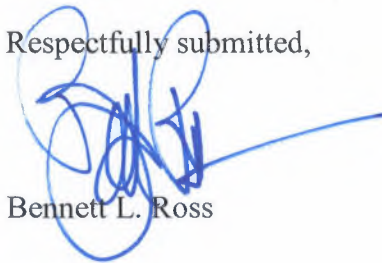
Grant of this STA request will serve the public interest. STA is needed to allow MNA to continue to offer telecommunications services pending Commission action on the Application. MNA provides tandem switching and transport services for interexchange carriers in Missouri pursuant to interstate and intrastate tariffs. As such, grant of this STA request will permit the uninterrupted provision of these telecommunications services to MNA's existing customers.

Applicants request that the STA remain in effect for sixty (60) days. Applicants acknowledge that the grant of STA will not prejudice any action the Commission may take on the Application and that the STA can be revoked by the Commission upon its own motion without a hearing.

Finally, Applicants respectfully withdraw their request for *nunc pro tunc* approval of the transfer of control of MNA.

Should you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,



Bennett L. Ross

BLR/rw

cc: Dennis Johnson  
Gregory Kwan