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FILED VIA ECFS

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

**RE: Domestic Section 214 Application
Westside Independent Telephone Company, d/b/a Western Iowa Networks
BTC, Inc., d/b/a Western Iowa Networks
WC Docket No. 19-215**

Dear Ms. Dortch:

On behalf of the Assignees Westside Independent Telephone Company, d/b/a Western Iowa Networks ("Westside") and BTC, Inc., d/b/a Western Iowa Networks ("BTC"), the following additional clarification is provided with respect to the referenced pending "Application for Streamlined Assignment of Domestic Blanket Section 214 Authorizations" regarding the assets of Arcadia Telephone Cooperative ("Arcadia") and Monarc Technologies, LLC ("Monarc").

As noted previously, Tele-Services, Ltd., a Western Iowa Networks affiliate, provides cable television service within the Arcadia, Iowa local exchange service area, but Arcadia itself does not provide cable television service there. Westside and BTC have reviewed the provisions of Section 652 of the Communications Act, 47 U.S.C. §572, particularly the Section 652(b) provision regarding the acquisition by a cable operator or affiliate of a cable operator of a local exchange carrier providing telephone exchange service within the cable operator's franchise area.

Westside and BTC have determined that the present transaction is exempt from the Section 652(b) provision pursuant to the Rural Systems Exception in Section 652(d)(1). Specifically, the affiliates of cable operator Tele-Services, Ltd. may obtain a controlling interest (here, a 100% ownership interest) in local exchange carrier Arcadia Telephone Cooperative because Arcadia Telephone Cooperative's local exchange system and facilities only serve the rural community of Arcadia, Iowa, an incorporated area whose 2017 population of 487 is far fewer than the applicable 35,000 inhabitants standard and which is located outside of any urbanized area as defined by the Bureau of the Census (the closest urbanized area being the Omaha, Nebraska-Iowa Urbanized Area).

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Please contact me if you have any further questions.

Respectfully submitted,

/s/ Gerard J. Duffy

FCC Counsel for
Westside Independent Telephone Company,
d/b/a Western Iowa Networks
BTC, Inc., d/b/a Western Iowa Networks

cc: Dennis Johnson