



415 Hepplewhite Dr.
Johns Creek, GA 30022
770-649-1886 / fax 770-645-6545

Eileen@Bodamer.com • www.bodamer.com

September 4, 2019

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

**Re: SUPPLEMENT
WC Docket No. 19-234**, Domestic Section 214 Assignment of Certain Assets of MLGC
to Polar Telcom, Inc.

Dear Secretary Dortch:

At the request of Commission staff, Polar Telcom, Inc. ("Polar") clarifies certain information contained in the above-referenced Joint Application.

First, regarding Polar Telcom, the following additional information is provided:

- 1) Polar Telcom is wholly owned by Polar Mutual, a cooperative incumbent local exchange carrier. As a cooperative, no single member holds a 10% or greater interest in Polar Mutual.
- 2) In addition to its 100% ownership of Polar Telcom, Polar Mutual owns 10% or more of the following providers of domestic telecommunications services:
 - a. 100% of Wolverton Telephone, an incumbent local service provider organized as a corporation in the state of Minnesota and serving Wolverton, MN and Walcott and Christine, ND.
 - b. 40.5% ownership interest in The Phone Company dba North Dakota Telephone, an incumbent local service provider organized as a corporation in the state of North Dakota and serving Balta, Cando, Crary, Devils Lake, Drake, Esmond, Fessenden, Fort Totten, Hampden, Harvey, Knox, Leeds, Maddock, McVile, Minnewaukan, New Rockford, Oberon, Pekin, Penn, Rugby, Sheyenne, Starkweather, Tolna, Warwick, and Webster, North Dakota

Applicants further state that neither Polar nor Polar Mutual holds a 10% or greater interest in any other provider of domestic telecommunications services.

- 3) Polar Telcom currently provides CLEC services in Larimore and Grafton, ND. The state of North Dakota allows state-wide operating authority to CLECs subject to registration of the CLEC's service areas. Polar is currently registered to provide competitive telecom services in Larimore and Grafton and will add Northwood following the sale of the assets in that exchange.

Second, the following clarification about services offered by MLGC is provided:

Moore and Liberty Telephone Company and Griggs County Telephone Company were each established in 1906 and merged under Griggs County Telephone Company in 2012. MLGC, LLC, is a wholly owned subsidiary of Griggs County Telephone Company, established on August 29, 2002 as a Limited Liability Company in the State of North Dakota.

Griggs County Telephone (under the operating name of MLGC) provides incumbent telephone services in Finley, Binford, McHenry, Cooperstown, Enderlin, and Sheldon, North Dakota.

MLGC provides Cable TV services in the Eastern North Dakota communities of Enderlin, Kindred, Finley, and Northwood and competitive local exchange services in Northwood. MLGC also provides Cable TV service in the incumbent operating areas of Griggs County Telephone.

Lastly, Applicants state that the service area of Northwood is separate and distinct from the service areas of both Polar Mutual and their affiliates

Should you have any questions concerning this filing, please do not hesitate to me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eileen M. Bodamer". The signature is fluid and cursive, with the first name "Eileen" and last name "Bodamer" clearly distinguishable.

Eileen M Bodamer, Consultant to Polar Telcom

Cc: Karl Blake
Tyler Kilde
Gregory Kwan