



BLAZING FAST FIBER INTERNET

September 5, 2018

**VIA ECFS**

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

**Re: Support of Motion for Summary Denial; WC Docket No. 18-141**

Dear Ms. Dortch,

IDEATEK hereby supports the Motion for Summary Denial filed on August 6, 2018, by INCOMPAS, FISPA, the Midwest Association of Competitive Communications ("MACC"), and the Northwest Telecommunications Association (collectively, the "Competitive Carriers Group") in the above-referenced proceeding. As Stated in the Motion, the Petition is, on its face, overbroad. For example it treats areas like the central business district in New York City the same as a rural county in Kansas even though there are areas in Kansas where there would be no broadband services without the use of unbundled network elements. Since the petition does not meet the burden of proof for granting the petition, based on the standard established for forbearance relief, the Commission should summarily deny the Petition pursuant to 47 U.S.C. § 160(c).

Respectfully,

A handwritten signature in blue ink, appearing to read "DF", is written over a blue rectangular background.

Daniel Friesen  
Managing Member and Chief Innovation officer