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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 in Section 7 of the referenced application, Prairie Telephone Company, Inc., d/b/a Western Iowa Networks ("Prairie") -- which owns 100 percent of BTC and is in turn owned 100 percent by Breda Telephone Corp., Inc., d/b/a Western Iowa Networks ("Breda") -- owns a non-controlling 11.140 percent limited partnership interest in Iowa RSA No. 1 Limited Partnership, an Iowa limited partnership that provides wireless telecommunications services in western Iowa. To be more specific, Iowa RSA No. 1 Limited Partnership (FRN 0002576411) does business as Chat Mobility, and serves the Iowa counties of Mills, Montgomery, Adams, Fremont, Page and Taylor. Hence, not only is Prairie a non-controlling limited partner in Iowa RSA No. 1 Limited Partnership, but also none of the six counties served by that limited partnership are located within the Arcadia or Monarc service areas.

As also noted in Section 7 of the referenced application, "Breda and Prairie each own a non-controlling 12.500 percent voting stock interest (an aggregate non-controlling voting stock interest of 25.000 percent) in West Iowa Cellular, Inc., an Iowa corporation that provides wireless telecommunications services in western Iowa." Upon further review, that statement is somewhat inaccurate in that West Iowa Cellular, Inc. is not a direct provider of wireless services, but rather is the owner of a 49 percent minority and non-controlling limited partnership interest

in Iowa 8 – Monona Limited Partnership (FRN 0001608009), a wireless service provider which is controlled and operated by a Verizon affiliate. Iowa 8 – Monona Limited Partnership is licensed to serve the Iowa counties of Crawford (2010 population: 17,096), Monona (2010 population: 9,243), Harrison (2010 population: 14,928) and Shelby (2010 population: 12,167). The community of Denison in Crawford County, which is served by Monarc as a competitive local exchange carrier (“CLEC”) in competition with Frontier Communications, had a 2010 population of 8,298 – or approximately 15.5 percent of the total population of the Iowa 8 – Monona Limited Partnership service area. Hence, not only are Breda and Prairie non-controlling minority 25 percent shareholders in a minority and non-controlling 49 percent limited partner (*i.e.*, with a derivative 12.25 percent non-controlling equity interest in the Iowa RSA 8 limited partnership), but also the Denison CLEC service area that BTC is acquiring comprises only a small portion of the population of the Iowa 8 – Monona service area.

Finally, as noted in Section 7 of the referenced application, Breda owns a non-controlling 15.001 percent limited partnership interest in Iowa RSA No. 9 Limited Partnership (FRN 0002842425), an Iowa limited partnership that provides wireless telecommunications services in western Iowa. That limited partnership is controlled and operated by a US Cellular entity, and serves the Iowa counties of Ida (2010 population: 7,089), Sac (2010 population: 10,350), Calhoun (2010 population: 9,670), Carroll (2010 population: 20,816) and Greene (2010 population: 9,336). The community of Arcadia where Westside is acquiring incumbent local exchange service assets, had a 2010 population of 484 – or less than 1.0 percent of the total population of the RSA 9 service area. Hence, not only is Breda a non-controlling limited partner in the Iowa RSA No. 9 Limited Partnership, but also the Arcadia service area that Westside is acquiring constitutes only a very small portion of the Iowa RSA 9 service area.

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