

Lance J.M. Steinhart, P.C.

Attorneys At Law
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005

Also Admitted in New York
Email: lsteinhart@telecomcounsel.com

Telephone: (770) 232-9200
Facsimile: (770) 232-9208

VIA ECFS

Ms. Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Attn: Wireline Competition Bureau

Re: Teo Communication Services, Inc. and Teo Acquisition Sub., LLC; Joint
Request for Special Temporary Authority to Operate Pending
Approval of Transfer of Control Application

Dear Ms. Dortch,

Pursuant to 47 U.S.C. § 214, Teo Communication Services, Inc. (FRN 0023341290) ("Teo Services"), along with Teo Acquisition Sub, LLC ("Teo Sub") ('collectively, the "Applicants"), hereby request Special Temporary Authority ("STA") so that for Teo Sub can continue to service newly acquired business pending Commission approval of their Section 214 application for domestic transfer of control (the " Application").

Effective, September 11, 2018, all of the issued and outstanding capital stock in Teo Services was sold to Teo Sub (the "Transaction") pursuant to a stock purchase agreement dated September 11, 2018 by and between Stephen R. Hill and Teo Sub (the "Agreement"). The Transaction resulted in the sale of Teo Services domestic operations and customers, *see* 47 C.F.R. §§ 63.01, 63.03, and 63.04.

Additional details about the sale and the Applicants are included in the Application seeking Commission approval for the transfer of control.

Unfortunately, the Applicants did not seek timely Commission approval of the Transaction. The oversight was inadvertent and unintentional. At the time of the Transaction, Teo did not have advice from federal communications counsel on the Transaction and it was not aware of the obligation to request Commission approval. As soon as this failure came to the Applicants' attention, the Applicants took steps to remedy the noncompliance and to seek authority, to the extent necessary, for the continued provision of service to customers. The Applicants regret this oversight and have taken steps to ensure compliance with all applicable Commission requirements going forward.

Ms. Marlene H. Dortch, Secretary

September 25, 2018

Page 2

Grant of the STA will serve the public interest by permitting the continued, uninterrupted provision of service to customers while the Commission reviews the Application. Grant of the STA also will promote competition in the VoIP telephone services marketplace. Without discounting the regulatory obligation to obtain prior approval, the Applicants note that no harm to customers or to the market occurred as a result of Applicants' oversight. The Applicants have acted in good faith to rectify the failure to file for approval of the domestic assignment as quickly as possible.

The Applicants request temporary authority for sixty (60) days while the Application is pending. The Applicants acknowledge that grant of the requested STA will not prejudice any action the Commission may take on the Application, and that, once granted, the STA may be revoked on the Commission's own notice, without hearing. The Applicants further acknowledge that grant of an STA and the t Application will not preclude enforcement action.

This filing and the applicable credit card payment in the amount of \$1,195.00, which satisfies the filing fee required under line 2.d. of Section 1.1107 of the Commission's rules, are being submitted electronically through the ECFS.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Respectfully submitted,



Lance J.M. Steinhart, Esq.
Managing Attorney
Lance J.M. Steinhart, P.C.
*Attorneys for Teo Communication
Services, Inc. and Teo Acquisition Sub, LLC*