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December 18, 2003

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William Dever, Assistant Division Chief  
Competition Policy Division  
Wireline Competition Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W., Room 5-C266  
Washington, D.C. 20554

Re: Docket No. 03-255  
Application for Authorization of Transfer of Control  
relating to Section 214 Authorization for Resale of  
Domestic Telecommunications Services

Dear Mr. Dever:

This letter is submitted to provide supplemental information for the Commission's consideration in connection with the above-referenced application.

Attached is a certification on behalf of Nehalem Telephone & Telegraph Company ("NTT") referring to no denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

With reference to the request by applicants for streamlined processing pursuant to Section 63.03(b) of the Commission's rules, the applicants submit that they, including their affiliates, satisfy all three prongs of the requirements related to eligibility for streamlined processing. The application is supplemented at item (8) to indicate that the proposed transaction will result in the transferee, Nehalem Telecommunications, Inc. ("NTI"), and affiliates thereof having less than 10% of the market share in the interstate, interexchange market. Applicants, including their affiliates, are not and will not be engaged in competitive local exchange service in the market. Applicants meet the criteria specified in Section 63.03(b)(2)(iii) which provides as follows:

(2) Where a proposed transaction would result in a transferee having a market share in the interstate, interexchange market of less than 10 percent, and the transferee would provide competitive telephone exchange services or exchange access services (if at all) exclusively in geographic areas served by a dominant local exchange carrier that is not a party to the transaction, the streamlined procedures provided in this rule shall be presumed to apply to transfer of control applications in which:

\* \* \*

(iii) The applicants are incumbent independent local exchange carriers (as defined in §64.1902 of this chapter) that have, in combination, fewer than two (2) percent of the nation's subscriber lines installed in the aggregate nationwide, and no overlapping or adjacent service areas.

It is certified by NTI that neither it nor its affiliates provides local exchange service in any overlapping or adjacent area with reference to the NTT local exchange area.

The parties to the application request Commission Section 214 authorization relating to a proposed sale by NT&T of its assets that relate only to long distance resale operations by resale of telecommunications services to domestic points (and in the joint application resale to international points.) The parties respectfully submit that because NT&T is a "connecting carrier" within the meaning of Section 2(b)(2) of the Communications Act, the sale of assets relating to local exchange operations of NT&T may proceed without need for Commission authorization except as to a radio license held by NT&T.

Should any questions arise, please communicate with this office.

Very truly yours,



David L. Nace

cc: Christi Shewman

By my signature below I hereby certify, under penalty of perjury, that to the best of my knowledge, information and belief, neither Nehalem Telephone & Telegraph Company nor any party to the application (FCC Docket No. 03-255) is subject to a denial of Federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988.

St. C. Harper

Name: STEVEN C. HARPER

Title: CONTROLLER