

LAW OFFICES
BLOOSTON, MORDKOFKY, DICKENS, DUFFY & PRENDERGAST
2120 L STREET, NW
WASHINGTON, DC 20037

HAROLD MORDKOFKY
BENJAMIN H. DICKENS, JR.
JOHN A. PRENDERGAST
GERARD J. DUFFY
RICHARD D. RUBINO
MARY J. SISAK
D. CARY MITCHELL

ARTHUR BLOOSTON
1914 – 1999

(202) 659-0830
FACSIMILE: (202) 828-5568

AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES
BUENOS AIRES, ARGENTINA

ROBERT M. JACKSON
OF COUNSEL

PERRY W. WOOFER
LEGISLATIVE CONSULTANT

EUGENE MALISZEWSKYJ
DIRECTOR OF ENGINEERING
PRIVATE RADIO

May 13, 2005

WRITER'S CONTACT INFORMATION

202-828-5528
gjd@bloostonlaw.com

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

RE: Beaver Creek Telephone Company (WC Docket No. 05-69)

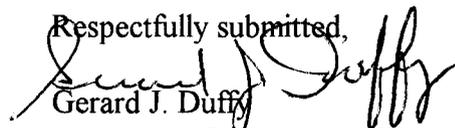
Dear Ms. Dortch:

On December 8, 2004, Beaver Creek Telephone Company ("Beaver Creek") requested waiver of Sections 69.2(hh) and 69.601 of the Rules so that it can become a member of the National Exchange Carrier Association ("NECA") and participate in NECA tariffs and pools. Waiver of Section 69.2(hh) will allow Beaver Creek to be classified as a "telephone company" and a "local exchange carrier" as those terms are used in Part 69. Pursuant to the express language of Section 69.2(hh), this will allow Beaver Creek to be an "incumbent local exchange carrier" as defined in Section 251(h) of the Communications Act, as amended. Waiver of Section 69.601 will allow Beaver Creek, as a "telephone company," to become a member of NECA, and participate in NECA's tariffs and pools.

Beaver Creek will seek support from federal universal service mechanisms at the appropriate times and via the appropriate procedures.

In addition to the foregoing waivers, Beaver Creek hereby requests waiver of any and all other relevant sections of Parts 54 and 36 of the Rules, to the extent necessary, in order to be treated as an "incumbent local exchange carrier" for the purposes of imposing access charges and receiving federal universal service support. Finally, Beaver Creek requests waiver of any Part 54 certification or data filing deadlines (e.g., those in Sections 54.301(b), 54.314(d) and 54.903(a) of the Rules) that would prevent it from beginning to receive high cost loop, local switching or interstate common line support on the date on which it would otherwise be entitled to receive such support. See Order (M&L Enterprises, Inc., d/b/a Skyline Telephone Company), DA 05-84, released January 14, 2005.

Respectfully submitted,



Gerard J. Duffy
Counsel for Beaver Creek Telephone Company