

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

(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

ARTHUR BLOOSTON
1914 - 1999

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Federal Communications Commission
Office of Secretary

WRITER'S CONTACT INFORMATION
202-828-5528
gjd@bloostonlaw.com

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554
Attention: Dennis Johnson
Wireline Competition Bureau

RE: Beaver Creek Telephone Company
WC Docket No. 05-336

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Dear Ms. Dortch:

This letter is written to clarify the basis upon which Transferor Joel Eisenberg and Transferees Marilyn May, Deborah Bott, Suzanne Wilson, Pamela Smith and Catherine Hendrickson (collectively, "Applicants") are seeking streamlined treatment with respect to their referenced application for Commission authorization for the transfer of control of Beaver Creek Telephone Company ("BCTC").

Applicants recognize that Transferees may not qualify for streamlined treatment under Section 63.03(b)(1)(ii) of the Rules as entities that are "not a telecommunications provider" due to the affiliations listed in section (7) of their referenced application. Applicants therefore withdraw their request for streamlined treatment pursuant to Section 63.03(b)(1)(ii) of the Rules.

However, Applicants reiterate that the referenced application qualifies for streamlined treatment pursuant to Section 63.03(b)(2)(iii) of the Rules. As indicated in paragraph (8) of the application, the incumbent independent local exchange carriers ("ILECs") that may be deemed to be affiliated with the Applicants have, in combination, approximately 3,621 access lines, which is far less than two (2) percent of the nation's subscriber lines installed in the aggregate nationwide. In addition, there are no overlapping or adjacent service areas between BCTC and the affiliated ILECs. Rather, as indicated in section (7) of the application, the Washington exchanges served or to be served by

Marlene H. Dortch, Secretary
December 14, 2005
Page 2 of 2

BCTC are located over 500 miles from the exchanges operated by an affiliate of the Transferees in southeastern Idaho, over 600 miles from an exchange to be acquired by an affiliate of the Transferees in north central Utah, and 310 and 450 miles, respectively, from exchanges operated by affiliates of the Transferees in Oregon.

Applicants clarify that Direct Communications Star West ("DCSW") provides non-dominant long distance toll service and non-telecommunications services in the same general area of southeastern Idaho served by Direct Communications Rockland, Inc. That area is located over five hundred miles to the southeast of the BCTC exchanges, and is exclusively outside the geographic area served by BCTC. Hence, with respect to DCSW, the application qualifies for streamlined treatment under Section 63.03(b)(2)(ii) of the Rules.

Finally, Applicants clarify that they are seeking streamlined treatment under Sections 63.03(b)(2)(iii) and 63.03(b)(2)(ii) of the Rules, and not under Section 63.03(b)(2)(3).

Respectfully submitted,



Gerard J. Duffy

Counsel to Beaver Creek Telephone Company
And the Transferees